

The Otter Project - Environmental Center of San Luis Obispo - Santa Lucia Chapter of the Sierra Club - Desal Response Group at Environment Now - Surfrider Foundation

April 14, 2008

Mr. Robert Gresens, P.E.
District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, California 93428

VIA FACSIMILE and Hard Copy

Dear Mr. Gresens and Cambria Community Services District Board Members:

Concerned local citizens have asked The Otter Project, Environmental Center of San Luis Obispo, Santa Lucia Chapter of the Sierra Club, DeSal Response Group of Environment NOW, and Surfrider Foundation to comment on the CCSD Draft Program Level EIR for the Water Master Plan. These comments are made on behalf of our organizations and our California, San Luis Obispo County, and Cambria memberships. Following are our comments.

Project Description

Nowhere in the project description or any other section of the DEIR are the project goals and objectives clearly stated. Without a clear picture of these goals and objectives, the DEIR cannot sufficiently or objectively analyze the project alternatives' ability to meet the goals and objectives.

Section 3.

The project description does not adequately or accurately document the existing conditions.

It is important that the DEIR depict the geological characteristics of potential project areas. Also, especially when considering seawater desalination and/or a new point-source of discharge, it is important to adequately characterize impacted marine environments. Neither of these characterizations are included in the *Project Location and Setting* section.

Further, water supply appears to be based upon the California Coastal Commission development permit limiting diversions from San Simeon and Santa Rosa creek basins to 1230 acre feet per year. The CCSD maintains that additional sources are needed as noted in the following statement:

“The Baseline Water Supply Analysis (Kennedy/Jenks Consultants, December 8, 2000) (Baseline Analysis) developed a system of models based on historical data

that projected basin response to increased levels of water demand to determine the adequacy of the groundwater supply. From the model, it was determined that the current groundwater supply was not adequate to provide a 90 or 95 percent level of reliability for water demands greater than 10 percent of the 1999 demands (4,176 residential connections). Thus, the basins cannot reliably meet the increased demands of the waiting list and grandfathered connections (4,650 residential connections) without an additional water source."

However, as noted in the referenced - but not included in the EIR - "Final Draft Assessment of Long-Term Water Supply Alternatives, Section 2" conditions have significantly changed since the *Baseline* completion in December 2000. Previous to 2002 the CCSD shared water and provided a 2-inch pipe to an irrigated agriculture operation in the San Simeon basin. In 2002 the CCSD entered into a fallowing agreement with the operation and presumably now has that water available to Cambria or to simply keep within the basin. Similarly, in 2001 the CCSD acquired East/West Ranch: "the acquisition of this property provides CCSD with a means to control agricultural use within the Ranch, and to consequently limit or prevent any future irrigation." The DSEIS does not account for these substantial acquisitions and is therefore very significantly deficient.

The project description calculates residential use at 135 gallons per person per day (we assume this includes the 50-percent "quality of life" bonus - see below). Commercial demand for potable water and total demand for non-potable water do not appear to be analyzed. The 135 gallons per person per day for residential use is excessive and the need for this volume is unsubstantiated. Even 90 gallons (back-calculated from 135 gallons - 50-percent "quality of life" bonus) seems excessive for a community supposedly under strict water conservation measures. According to the most recent US Geological Survey report, *Estimated Water Use in the United States in 2000*, domestic water use in California is approximately 95 gallons per person per day. According to the 2003 Pacific Institute Report *Waste Not, Want Not*, (which uses a rounded up figure of 100 gallons) per capita total urban water use in the United States was 100 gallons in 2000. Of those 100 gallons, 60.5 gallons was for indoor use and 39.5 gallons was used outdoors. (Note: the ratio of indoor to outdoor water use varies from study to study, but a total domestic water use of 95-100 gallons per capita per day (gpcd) and 60-70 gallons for indoor use is commonly found). The Institute estimates that, "With current technologies and policies, [indoor and outdoor] residential water use in 2000 could have been as low as 60 to 65 gpcd without any change in the services actually provided by the water." Further, the Institute estimates, "Even without improvements in technology, we estimate that indoor residential use could be reduced by approximately 890,000 AF/yr - almost 40 percent," or to approximately 37 gpcd. Water use in Cambria and the United States should be further compared against water use in other countries such as France, Germany, and the UK, where per capita household water use is half the US. Clearly, reductions below 90 gallons per person per day are possible by curtailing most outdoor residential use. One hundred thirty-five gpcd is excessive.

The *Baseline Analysis* identifies demands for quality of life increases of 10, 20, 30, and 50 percent higher than existing demands. The DEIR, without any explanation other than

“CCSD Board of Directors’ earlier July 24, 2003 direction” chose the highest, 50-percent, “quality of life” bonus over existing demand. Such an unsubstantiated increase is unwarranted given water use patterns in the rest of the United States and the world.

We see no documentation for the 75% assumed occupancy rate resulting in the 1.66 people per unit assumption. We must ask: what is the basis for a year-round 75-percent occupancy rate? Cambria has many vacation homes and we believe a 75% occupancy rate is overstated. Please provide the basis for this important assumption.

More simply stated: Cambria water use (90 gpcd) is barely under the national average (95 gpcd). To suggest that Cambria should finance and build an industrial desalination facility with such a comparatively large environmental footprint so that residents can use 135 gallons gpcd is not responsible conservation or management. As very clearly shown in Table 3.2, the “quality of life” bonus drives this proposal.

The Project Characteristics and Table 3-6

Desalination: The project characteristics prematurely and inappropriately lead the reader to the conclusion that saltwater desalination is the advisable long-term water supply strategy. The characteristics listed for the desalination component only characterize the perceived positives of seawater desalination. Challenges associated with seawater desalination which may foreseeable impact the environment include its large global-warming footprint (associated with emissions and the energy needed to run the facility), plant siting (including, but not limited to considerations for future sea level rise), possible growth inducement (which has been cited as a mitigated negative impact), brine discharge to the marine environment, and cumulative impacts (including, but not limited to the proliferation of small desal plants in the region, as opposed to regionally-minded water supply planning). Additionally, the DEIR cites that seawater desalination is a “very reliable [water supply] source,” which operates under the assumption that the desalination facility will run properly. Seawater desalination facilities are known to be plagued with technical and operational problems that prevent them from functioning in their designed capacity, such as the permitted facilities in Tampa Bay, Florida and Marina, California.

The matrix, Table 3-6, includes cost and funding - these sections are totally inappropriate for a DSEIS and CEQA analysis that is used to evaluate the environmental consequences of proposed actions and alternatives. This matrix and discussion should be either shown without factoring in cost and funding, or should be eliminated entirely.

The subjectivity of the matrix is a serious problem. First, each category is given equal weight, as noted above, which is entirely inappropriate in a CEQA document meant to compare environmental costs and benefits. Next, the matrix appears to handicap ideas such as “seasonal storage alternatives” discussed in Task 3 but never carried forward into the DEIR. Local, smaller scale, less expensive, easier-to-permit projects such as using the Perry Creek Dam or Upper Steiner Creek Dam could provide additional water to both residents and groundwater if designed appropriately.

The subjectivity of the “reliability” score is also a problem. We do not understand how a solution as technical and energy dependent as desalination can be more reliable (scored 5 of a possible 5) than a reservoir solution (scored 2 of 5) or demand management (scored 2 of 5). Few, if any, desalination plants in the United States are able to operate at the capacity they were designed for.

The “permitting” score is simply not realistic. The Coastal Commission has twice rejected a Cambria desalination plant. Certainly, being rejected by the Coastal Commission once and again on appeal should score as “very difficult to obtain” (a score of 1 of 5).

While citing “*Final Task 4 Report: Assessment of Long-Term Water Supply Alternatives, Table 8-37*” as the source for Table 3-6, the matrix shown in DSEIS does not match Table 8-37. While the discrepancy does not change the ranking, it does appear to ‘bump up’ desalination above the other preferred alternatives. It must be noted that the final evaluation matrix shown in Table 3-6 of the DSEIS perhaps unfairly characterizes the funding availability of the Seawater Desalination alternative against all other alternatives giving it a score of 4 of a possible 5 (75% cost reduction). Public funding of desalination plants is far from a certainty! Examples of 75-percent publicly funded municipal desalination facilities should be provided to substantiate this assertion.

In comparison, the funding of the recycled water solution is given a score of 3; there are a variety of public sources for sewage treatment upgrade and recycled water projects. Funding opportunities for sewage treatment plant upgrades (so that water can be better re-used), water recycling projects, and water conservation include:

Small Community Wastewater Grant Program

- Provides grant assistance for the construction of publicly owned wastewater treatment facilities for small communities (max. pop. 20,000) with financial hardships (max. annual MHI \$37,994)
- Contact: David Kirn, 916-341-5720, dkirn@waterboards.ca.gov.
- Website: <http://www.waterboards.ca.gov/cwphome/scwg/index.html>

Water Recycling Construction Program & Water Recycling Facilities Planning Grant Program

- Grants and loans for the design and construction of water recycling facilities, which include wastewater treatment facilities, pump stations, and recycled water distribution systems
- Contact: Bob Pontureri, 916-341-5828, rpontureri@waterboards.ca.gov
- Website: <http://www.waterboards.ca.gov/recycling/recyfund.html>

Clean Beaches Initiative Grant Program (Prop 84) \$37 million

- Grants and bonds to help local agencies, non-profit organizations, and public agencies implement projects that protect and restore California’s coastal water quality

- Contact: Laura Peters, (916) 341-5854, lpeters@waterboards.ca.gov
- Website: <http://www.swrcb.ca.gov/cwphome/beaches/index.html>

Department of Water Resources - Integrated Regional Water Management Grant Program

- Proposition 84 Grants \$1 billion total; \$52 million for the Central Coast - funding for water conservation, water use efficiency, water reclamation and improvement of water quality
- Proposition 50 Grants \$380 million - funding for projects to protect communities from drought, protect and improve water quality, and reduce dependence on imported water
- Implementation Grants - grants designed for projects that are ready for or nearly ready to proceed
- Contact: Tracie Billington, 916-651-9226, tracieb@water.ca.gov
- Website: <http://www.grantsloans.water.ca.gov/grants/integregio.cfm>

Ocean Protection Council

- Protection of Beaches, Bays, and Coastal Waters (Prop 84) \$90 million - grant funds to meet the goals Governor Schwarzenegger's Ocean Protection Act, which has a main objective to improve ocean and coastal water quality.
- Contact: Rebecca Pollock, 510-286-0319, rpollack@scc.ca.gov
- Website: http://resources.ca.gov/copc/project_application_instructions.html

State Coastal Conservancy

- Protection of Beaches, Bays, and Coastal Waters (Prop 84) \$135 million
- California Sea Otter Fund tax donation
- Contact: Rebecca Pollock, 510-286-0319, rpollack@scc.ca.gov
- http://www.scc.ca.gov/Public_Info/contacts.htm

Division of Financial Assistance

- Administers the implementation of the State Water Resources Control Board's financial assistance programs, which includes loan and grant funding for construction of municipal sewage and water recycling facilities, etc.
- Contact: Sudhakar Talanki, 916-341-5434, stalanki@waterboards.ca.gov
- Website: <http://www.waterboards.ca.gov/funding/index.html>

State Revolving Fund \$200-\$300 million annually

- Implements the Clean Water Act and various State laws by providing financial assistance for the construction of facilities or implementation of measures necessary to address water quality problems and to prevent water pollution
- Contact: Christopher Stevens, 916-341-5698, cstevens@waterboards.ca.gov
- Website: <http://www.swrcb.ca.gov/funding/srf.html>

California Infrastructure and Economic Development Bank (I-Bank)

- Administers Infrastructure State Revolving Fund (ISRF) Program, which provides low-cost financing to public agencies for a wide variety of infrastructure projects

- Contact: Jim Young, 916-445-6733
- Website: http://www.ibank.ca.gov/state/ibank/ibank_homepage.jsp

Total scores would become very different if scored more quantitatively, evenly, and fairly. As noted above, within the context of CEQA, “cost combination” and “funding availability” should not be considered at all. “Demand management” scores the highest of all alternatives, yet the CCSD proposes a “quality of life” water bonus of 50-percent above current use - this appears to be something other than “demand management.” While national water use is 95 gpcd - and declining - Cambria water use is 90 gpcd and proposed to increase to guzzling 135 gpcd. If just reliability and permitting are re-scored more appropriately, the entire ranking would change with demand management and recycled water maintaining top positions, but seawater desalination falling to near the bottom.

Recycled Water System: The statement: “existing demands converted from potable to non-potable recycled water would have no net increase [decrease?] in the volume of water being diverted from the aquifer system” is confusing. As noted, 450,000 gallons per day is available for storage and recycling. Even if we accept Table 3-7, Potential Recycled Water Users and Demands, which we feel may be an under-estimate of potential recycled water use, 161-184 acre-feet per year is still a 13-15 percent savings and reduction in the amount of water needed to be drawn from the aquifer, assuming that the recycled water replaces the existing use of potable water for landscaping and irrigating.

Water Demand Management: The water demand management project characteristics lack any detail. The project characteristics list actions taken in 2000, “recent” addition of a front-loading washing machine retrofit program, and signing-on to a 2005 statewide MOU. It is unclear what are being proposed as new measures; there is a single reference without any commitment:

“Future demand management measures may include greater emphasis on landscape irrigation. Such measures may include the addition of rain sensors to ensure irrigation systems shut-off during periods of rain. The installation of evapotranspiration (ET) controllers may also become part of future landscape irrigation efficiency improvement measures.”

Further reductions in indoor water use should include a numeric target such as 45 gallons per person per day as is suggested as easily attainable in the Pacific Institute Report “Waste Not, Want Not.” Outdoor water use should be reduced to an absolute minimum or banned. In a setting as beautiful as Cambria, natural landscaping should be required. Advantages of natural landscaping include:

- no fertilization required
- no additional water
- more water available for other uses and other people
- zero to near zero work needed for maintenance
- no lawn mowing
- erosion reduced to a minimum
- natural landscaped plants take full advantage of rainfall

- when water restrictions are implemented, natural landscaped plants will survive, while more traditional plants may not
- increased habitat for native flora and fauna
- where heavily forested, provides shade on homes and businesses saving energy
- native plants rarely become invasive

And again, the 50-percent “quality of life” bonus of a 50-percent increase above current use is entirely inconsistent with the concept of “water demand management.” One hundred and thirty-five gallons of water per person per day is wasteful and inappropriate.

Build-out reduction program: While we question the decision-making behind the 864 residential water connection commitments that have been previously approved by the CCSD with no water available, we agree with the CCSD’s desire to limit water connections to no more than 4650 as confirmed by the CCSD’s Board of Directors’ meeting of July 24, 2003. However we see no commitment to hold the line at 4650 total connections. Instead, we see a proposal for a “modular” desalination facility that could be easily enlarged. Or, if actual use is less than 135 gpcd, the surplus could be used for additional connections. As noted in the DEIR, the CCSD will become a ‘major player’ in the local real estate market as it buys lots and sells water connections.

Stated more simply, 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 understated.

Section 4 - Cumulative Impact Analysis

It is impossible to evaluate or comment upon the CEQA required DEIR analysis of cumulative impacts because there is none. The four page analysis is simply a cut and paste description of requirements. There is the acknowledgement:

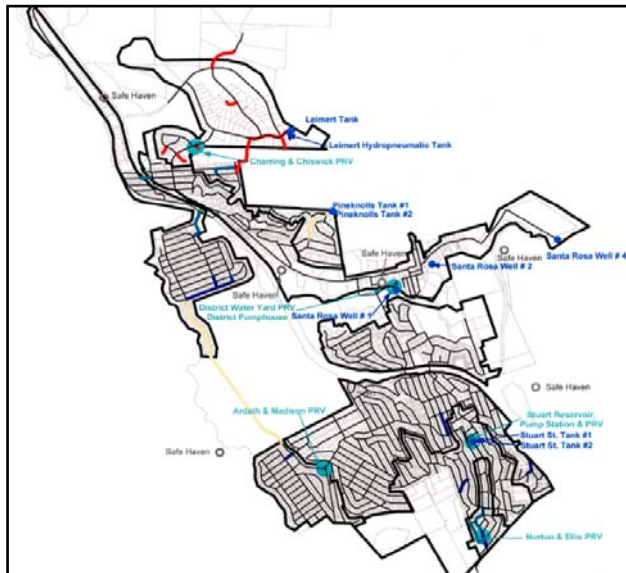
“The Initial Study Checklist (Appendix G of the *CEQA Guidelines*) provided as part of Appendix 15.1, indicates that the proposed project may yield potentially significant cumulative effects. As a result, Section 5.0 of this EIR assesses cumulative impacts for each applicable environmental issue, and does so to a degree that reflects each impact’s severity and likelihood of occurrence.”

While Section 5 does evaluate each individual impact, there is no discussion of cumulative impacts.

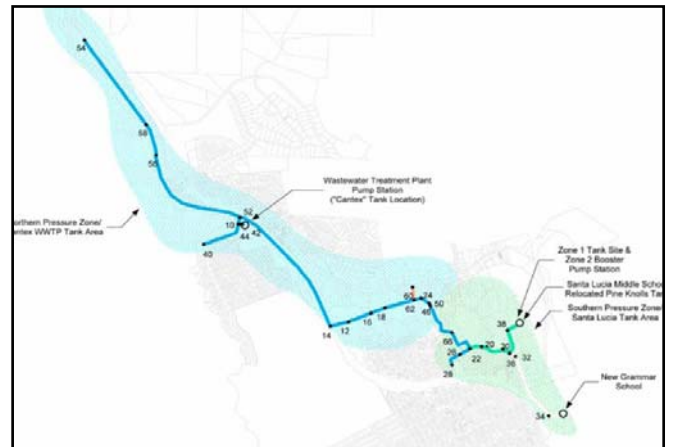
It is difficult to understand how a project of this magnitude cannot have cumulative impacts:



Desalination Plant



Potable Water Distribution Improvements



Recycled Water Distribution System

Plus:

- Additional source of water contributing to growth

Together, these modifications will contribute to increases in traffic, urban footprint and impermeable surface area, population, runoff and sedimentation, air pollution, noise, hydro-modification, and increased demand on other public services. Additionally, cumulative impacts could occur as the result of this incredibly localized approach to water supply planning (including, but not limited to the proliferation of small desal plants in the region, as opposed to regionally-minded water supply planning). None of these are considered for their cumulative effect. The very high cost of the 'new' desalinated water will lead to increased land and home prices and the further gentrification of coastal California.

Cumulative impacts are acknowledged by the CCSD but are not evaluated as required by CEQA. Instead cumulative impacts are cursorily treated only within the context of an impact section. As an example, the cumulative impact of the project components may be considered within a section such as land use, but the cumulative impact of a land use change on biological resources or water resources is not evaluated as required by CEQA.

Section 5 - Environmental Analysis

Each section appears to cut and paste portions of regulatory and planning documents in an effort to create an overview of existing regulatory conditions. Following is a statement of impact and mitigation measures.

What is lacking is a description and analysis of what change will occur due to the project. As an example, in the land use section, 19 of 25 pages are devoted to a review of applicable regulations and existing conditions, but no mention is made in the entire section of the 864 new connections and homes that will be built as a result of the project. Without some description, in each section, of the change from the existing condition, it is impossible to evaluate the impacts and merits of the project.

Consistently, impact is measured against regulatory and planning policy and not against real change in the Cambria environment. The focus on the regulatory environment versus the real tangible environment circumvents the CEQA process.

As noted above, cumulative impacts are considered only within the context of each section and not within the context of looking across all sections and considering the consequences of the project. A cumulative impact evaluation - across all potential impacts -- is required. The section by section consideration is not adequate.

5.1 - Land Use

As already noted impacts to land use appear to be narrowly defined in the DEIR as consistency with existing regulatory and planning policies. We believe it is also appropriate to document change to land use patterns and consider the environmental consequence of those changes. Certainly increasing the developed land area by 20-percent would be a very significant change and requires evaluation. This evaluation has not been provided.

We find it somehow ironic that the nondescript, undefined water management program is deemed to have no impact, but that the consequences of the planned fifty-percent quality of life bonus have not been evaluated or even mentioned - this increase in water use if applied outdoors will change a relatively arid urban landscape into an irrigated one.

We find the growth inducing impacts of the desalination component poorly described and minimized. We have little confidence that growth will stop at 4650 connections given that the desalination plant will 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.

5.2 - Aesthetics

Again, the discussion of the impact of the project is very constrained to the impact of the project itself and ignores the impact of growth and the change in character of Cambria. As an example, the aesthetic impact of the desalination plant is limited to discussion of the design, aesthetics, light, and glare of the plant itself.

The desalination plant enables a degree of growth that must be evaluated.

5.6 - Biological

This section is a good example of a general criticism of this DEIR. The first paragraph of the "Significance Criteria" states:

"Both direct and indirect impacts on biological resources have been evaluated.

Direct impacts are those that affect habitats due to grading and construction.

Indirect impacts are those that would be related to disturbance from construction activities (e.g., noise, dust) and use of the project site."

We believe this is too narrow a definition of significant impact. Potential impacts of an industrial site on the bank of San Simeon Creek, the impacts of growth and development, and increased watering of the urban landscape have been entirely ignored and must be considered.

While the DEIR acknowledges significant impacts to include those activities that:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Game and Wildlife Service.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

The DEIR then states that the long-term impacts of desalination plant will not have any significant impact because:

"Once constructed, it is not anticipated that operation of the seawater desalination plant would result in significant impacts to sensitive plant and wildlife species, since operational activities would be contained within the new desalination facility."

Again, we believe the DEIR too narrowly construes impacts by only considering the impact to the immediate footprint of the plant. Not considered are:

- Increased inherent risks to steelhead, stream, and riparian communities by placing an industrial facility on the bank of San Simeon Creek. Inadvertently, but significantly, pipes break, chemicals are spilled, and sewage overflows at some point in the long life of these facilities. Increased risk to species and communities was not considered.
- Growth and development. Clearing, development, and increased watering of the urban environment will clearly have an impact on the rich biological resources of Cambria. Monterey Pine must be considered, including the cumulative impacts of all project components and consequences.

We are confused by the statement: "A future project-specific EIR/EIS would need to further determine the potential impacts to the marine environment after more details become known regarding the desalination facility." As this is a program level EIR it appears this is an acknowledgment that impacts are unknown and cannot be evaluated. Are we to understand that this Draft EIR is suggesting that the desalination project be approved without understanding the impacts? Obviously, the specific impacts of a desalination project and the broader biological impacts to the entire Cambria area must be better understood before the program can be approved.

5.7 - Cultural Resources.

The DEIR acknowledges the significance of San Simeon Creek and the rich archeological remains found there:

"The study area is one of the richest archaeological zones in San Luis Obispo County. The sites as a whole should be considered a historic district representative of coastal occupation for at least 5,000 years. As a whole, the San Simeon Creek area represents the best documented valley on the central coast. Almost every type of archaeological site found in the region is represented in this small study area: prehistoric Chumash villages, bedrock processing sites, other work sites, human burial locations, Spanish mission rancho, Mexican rancho, and American early ranching dairying."

Yet, the DEIR defers judgment on potential impacts with the statement:

"A future project-specific EIR/EIS would need to further determine the potential impacts to archaeological and/or historical resources after more details become known regarding the desalination facility. Additionally, the EIR/EIS would analyze alternative desalination facility sites."

Again, this appears to be an inappropriate application of the CEQA process and an illegal fragmentation of the project permitting. It is in this document that impacts should be recognized and evaluated. And it is in this document that alternative siting of the desalination facilities should be addressed.

5.9 - Hydrology and Water Quality

As previously stated, the DEIR appears to focus solely on the site specific impacts and ignores the broader impacts of growth, increases to the urban footprint, and increases to the amount of impermeable surfaces contributing to the acknowledged flooding problem.

And again as stated before, the DEIR states for the desalination facility:

“A future project-specific EIR/EIS would need to further determine the potential impacts to storm water and ocean water quality after more details become known regarding the desalination facility. Additionally, the EIR/EIS would analyze alternative desalination facility sites.”

Fragmenting the permitting of a project in order to ‘facilitate’ the permitting process is inappropriate. It is in this document that impacts should be recognized and evaluated. And it is in this document that alternative siting of the desalination facilities should be addressed.

In the subsection entitled “cumulative impacts” it is noted that the project will increase the amount of impervious surface. Yet, with no mention of the proposed 20% growth, it is simply stated that by complying with local ordinances impact will be less than significant. We see no substantiation for the claim that increase in stormwater runoff due to an increase in impermeable surface will be mitigated in any way. Cambria has an acknowledged flooding problem and we see no quantitative descriptive of how growth will be mitigated.

5.?? - Global Warming

The contributions and impacts of the proposed desalination plant to global warming are not shown. The effects of global warming are a concern in any estimation of future water availability and needs. Desalination plants are not exempt from those concerns. The rising sea levels and projected increase in frequency and intensity of extreme storms that are part of the picture of global climate change must be considered in evaluation of such impacts on the vulnerable intake and outfall structures of desalination plants. No California desalination plant in operation or on the drawing boards includes any adaptive measures to incorporate the effects of climate change into its design. Additionally, because desalination is the most energy-intensive water source, operation of desalination plants represents a significant increase in fossil-fuel consumption and greenhouse gas emissions.

6.0 - Alternatives

Table 3.6 is repeated as Table 6.1 in the Alternatives section. Please refer to our comments to Table 3.6. In essence, we believe Table 6.1 heavily and inappropriately leans towards the desalination alternative. Further, using cost and funding availability is an inappropriate screen in a CEQA analysis. Please refer to our more detailed comments on table 3.6.

A very significant omission of this CEQA analysis is any discussion of alternative siting for the desalination facility. This document is clearly incomplete without these siting alternatives. It is inappropriate to segment the permitting process and defer discussion of alternatives to a later process. As noted, San Simeon Creek has significant biological, cultural, estuary, and marine resources. Impacts to these resources have not been studied or quantified for this report and no alternatives have been offered. This document is clearly deficient.

Another notable omission from alternatives analysis is brackish water desalination. Brackish water desalination should also be investigated as a viable alternative, as this source water is less energy intensive to desalinate and the brine produced (and subsequently discharged) is less saline. A possible source for this water could be the contaminated Santa Rosa wells, as this water supply source is not currently considered usable. Implementing a brackish water desalination project here could serve to make use of this otherwise unusable water and reduce the global warming footprint of the desalination project. Other possible sources should be investigated as well.

In summary, as very clearly shown in Table 3.2, the "quality of life" bonus drives this proposal. Without the "quality of life" bonus, Cambria has a net annual surplus of water of 221 acre-feet. These numbers are based on data that dates to before agricultural irrigation rights in both water basins were retired. Reframing the question without the "quality of life" bonus leads to solutions that include conservation, water recycling, and local storage.

It is the "quality of life" bonus that should be more fully discussed in the DEIR, but is instead hidden in footnotes and ancillary documents. 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? Or is the 135 gpcd simply a way to justify more water production and growth? Either way, we feel conservation, water recycling, and perhaps some additional local storage capacity - essentially living within the means of the local aquifer - offer the most sustainable and reasonable solutions for Cambria.

Sincerely,



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