



To: Cambria Community Services District (CSD)

DT: 10/13/2016

Re: Sustainable Water Facility Draft Subsequent EIR

The Surfrider Foundation is dedicated to the protection and enjoyment of the world's oceans, waves, and beaches through a powerful activist network. We have the following comments and concerns regarding the SEIR and we support the "No project" alternative as many issues remain unaddressed by the Cambria CSD.

Our chapter does not support placing the destructive environmental impacts of desalination upon our fragile coastal environment when other options are clearly available. Also, our chapter does not support the Cambria CSD building and expanding its desalination plant without measurement and management of all other water resources available to the CSD, and further without extensive environmental review or documentation of public comment prior to construction.

Potential Damaging Ocean Outfall and Omission of Alternatives

Our San Luis Obispo chapter advocates county-wide for "No Ocean Outfall" and the CSD's Draft Subsequent EIR strongly implies the CSD could eventually dump waste from its desalination plant in the ocean. The adverse environmental impacts from this would be dislocation of native species from the outfall area or it could pressure locales to keep ocean outfall in place. We oppose any plan to place desalination waste into the ocean when other viable options are available.

We were also surprised to see that the CSD did not consider a constructed wetland as a site for measured and managed burial of the waste from desalination. Such projects are able to attract grant funding from many sources, and the benefits of constructed wetlands extend to local habitat and ecological resources while helping to recharge the aquifer. For example, Oxnard's Saline Treatment Wetland was successful in proving constructed wetlands can be useful in the management of RO Membrane concentrate for reclaimed water reuse. Certainly, if Cambria is to pursue measured growth, a good offset to growth is the construction of a new wetland, and this should be considered as an alternative.

Failure to Include Non-Potable Resources

Surfrider SLO has friends and members in Cambria. We share Cambria's rich and thriving community and natural environment. Indeed, Cambria is a special place for citizens and visitors alike. Our chapter has

witnessed the Cambria CSD's response to our recent drought, and we wonder whether the CSD is using the drought and the related opportunity to build and expand its desalination plant as an excuse to shift toward unbalanced long term, urban growth.

We have seen water conservation requirements placed upon Cambria's citizens, and we have witnessed Cambria's consumptive response. One of Cambria's consumptive responses was for residents to purchase non-potable water from other sources. The CSD lists privately-held sources of deliverable, non-potable sources on their website. Yet, Cambria's availability and consumption of non-potable, imported water was not measured and documented in the Sustainable Water Facility Draft Subsequent EIR. This resulted in an unbalanced, skewed report.

As a standard, outside irrigation of residential landscapes can sometimes amount to 40 percent of residential consumption. While the CSD has moved forward with plans to build a desalination plant, the citizens added conservation measures and found other sources for water (e.g. non-potable supply from outside sources). Without measuring and projecting non-potable water resources delivered to the community, or without the CSD considering procurement of non-potable resources for delivery through the CSD, the entire supply and demand structure of Cambria's water portfolio is inadequate and misleading. We strongly encourage the Cambria CSD to measure non-potable resources already imported by the community, to estimate the potential supply that imported non-potable water could provide in the future, and to consider purchasing non-potable water from other sources compared to potential economic and environmental impacts from building and expanding the desalination plant. Likewise, the CSD could modify its Wastewater Treatment Plant to make non-potable water more available to citizens.

Surfrider Foundation San Luis Obispo supports the Cambria CSD's consideration of environmentally-responsible methods for delivering secure water supplies to its businesses and residents. However, the chapter cannot support a CSD project that clearly has not measured available resources and has not considered every alternative to reduce the waste and environmental impacts associated with desalination. Surfrider SLO supports the "No Project" alternative for Cambria CSD's Sustainable Water Facility and we ask that our concerns and comments outlined above be integrated into the economic and environmental justifications for any new project.

Thank you for your consideration.

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