



14.2 Notice of Preparation Responses



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802- 4213

JUL 7 2004

151422SWR04PR13874:APS

Robert Gresens
Cambria Community Services District
P. O. Box 65
Cambria, California 93428

Dear Mr. Gresens:

The National Marine Fisheries Service (NOAA Fisheries) reviewed the Notice of Preparation of an Environmental Impact Report (EIR) for the Cambria Water Master Plan (Project) and understands that you would like guidance regarding the content and scope of the EIR. Accordingly, the EIR should clearly identify and describe the Project including interrelated and interdependent actions to the extent that NOAA Fisheries could develop an understanding of the potential effects (offsite, onsite, direct, indirect, temporary, permanent) of the Project on steelhead (*Oncorhynchus mykiss*) and their habitat. The EIR should include a list of measures for avoiding and minimizing potential negative effects of the Project on steelhead and their habitat. Unavoidable effects should be fully described according to life stage (i.e., spawning, rearing and migration) and features of this species' habitat. The manner in which the preferred alternative would be implemented should be clearly described. The potential benefits of the Project for steelhead, including any compensatory mitigation measures, should be described. Engineered design drawings and results of topographic surveys and hydrologic and hydraulic analyses should be included in the EIR.

NOAA Fisheries appreciates the opportunity to provide you with information that will support preparation of the EIR and looks forward to review of the Project. Please contact Anthony Spina at (562) 980-4045 if you have any questions concerning this letter or if you would like additional information.

Sincerely,

R. Rodney R. McInnis
Acting Regional Administrator



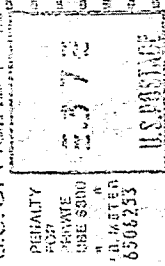
NATIONAL MARINE FISHERIES SERVICE

WEST REGION

OCEAN BLVD., SUITE 4200

LONG BEACH, CA 90802-4213

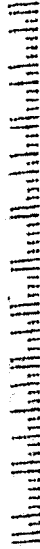
U.S. OFFICIAL MAIL



Robert Gresens
Cambria Community Services District
P. O. Box 65
Cambria, California 93428



CAMBRIA COMMUNITY SERVICES



93428+0063 01

From: "Tammy Rudock" <trudock@cambriacsd.org>
To: "WAYNE RYBURN" <slabtown1981@sbcglobal.net>
Date: 7/20/04 3:42PM
Subject: RE: Water Master Plan EIR

No written report exists by Joe Scalmanini; to date, his reports have been oral presentations. However, I will pass along your comment to Bob Gresens for his consideration.

-----Original Message-----

From: WAYNE RYBURN [mailto:slabtown1981@sbcglobal.net]
Sent: Tuesday, July 20, 2004 3:20 PM
To: Tammy Rudock
Cc: jcobin@charter.net; gal@rbf.com
Subject: Water Master Plan EIR

Dear Tammy,

Since a definitive statement regarding Cambria's primary water source is going to be included in the EIR we believe that the Watershed Study Report on San Simeon Creek by hydrologist Joseph Scalmanini should be reviewed and analyzed by RBF Consulting.

Thank you for the opportunity to comment.

Wayne Ryburn
Chair
North Coast Alliance

CC: <jcobin@charter.net>, <gal@rbf.com>, "Bob Gresens" <bgresens@cambriacsd.org>

From: WAYNE RYBURN <slabtown1981@sbcglobal.net>
To: <trudock@cambriacsd.org>
Date: 7/20/04 3:20PM
Subject: Water Master Plan EIR

Dear Tammy,

Since a definitive statement regarding Cambria's primary water source is going to be included in the EIR we believe that the Watershed Study Report on San Simeon Creek by hydrologist Joseph Scalmanini should be reviewed and analyzed by RBF Consulting.

Thank you for the opportunity to comment.

Wayne Ryburn
Chair
North Coast Alliance

CC: <jcobin@charter.net>, <gal@rbf.com>



DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>

POST OFFICE BOX 47
YOUNTVILLE, CALIFORNIA 94599
(707) 944-5500



July 22, 2004

Mr. Robert Gresens
Cambria Community Services District
Post Office Box 65
Cambria, CA 93428

Dear Mr. Gresens:

Cambria Water Master Plan
Notice of Preparation of a
Draft Environmental Impact Report
Cambria, San Luis Obispo County
SCH 2004071009

The Department of Fish and Game (DFG) has reviewed the document for the subject project. Please be advised this project may result in changes to fish and wildlife resources as described in the California Code of Regulations, Title 14, Section 753.5(d)(1)(A)-(G)¹. Therefore, if you are preparing an Environmental Impact Report for this project, a de minimis determination is not appropriate, and an environmental filing fee as required under Fish and Game Code Section 711.4(d) should be paid to the San Luis Obispo County Clerk on or before filing of the Notice of Determination for this project.

A complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats, should be provided. Rare, threatened and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, Section 15380). The assessment should identify any rare plants and rare natural communities, following DFG's Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities (revised May 8, 2000). The Guidelines are available at www.dfg.ca.gov/whdab/pdfs/guideplt.pdf.

¹ <http://ccr.oal.ca.gov/>. Find California Code of Regulations, Title 14 Natural Resources, Division 1, Section 753



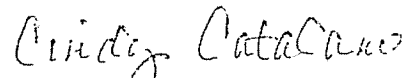
Robert Gresens
July 22, 2004
Page 2

Please be advised that a California Endangered Species Act (CESA) Permit must be obtained if the project has the potential to result in take of species of plants or animals listed under CESA, either during construction or over the life of the project. Issuance of a CESA Permit is subject to CEQA documentation; therefore, the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the project will impact CESA listed species, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA Permit.

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, DFG may require a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant. Issuance of SAAs is subject to CEQA. DFG, as a responsible agency under CEQA, will consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. To obtain information about the SAA notification process, please access our website at www.dfg.ca.gov/1600; or to request a notification package, contact the Streambed Alteration Program at (707) 944-5520.

If you have any questions, please contact Linda Hanson, Staff Environmental Scientist, at (707) 944-5562; or Carl Wilcox, Habitat Conservation Manager, at (707) 944-5525.

Sincerely,



Robert W. Floerke
Regional Manager
Central Coast Region

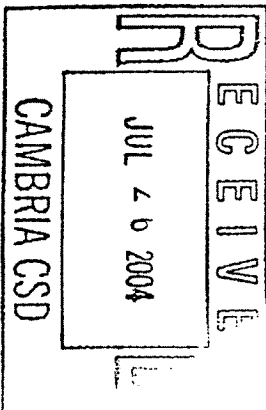
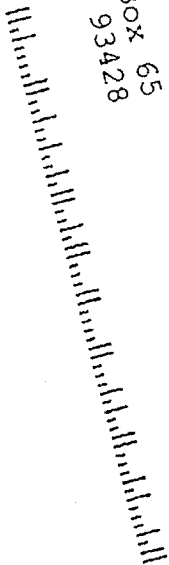
cc: State Clearinghouse



DEPARTMENT OF FISH AND GAME
 CENTRAL COAST REGION
 POST OFFICE BOX 47
 YOUNTVILLE, CA 94599

33428+0055 01

Mr. Robert Gresens
 Cambria Community Services
 Cambria District
 Post Office Box 65
 Cambria, CA 93428





SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING

VICTOR HOLANDA, AICP
DIRECTOR

July 29, 2004

Mr. Robert C. Gresens, P.E.
Cambria Community Services District
P.O. Box 65
Cambira, CA 93428

RE: Notice of Preparation of a Draft Environmental Impact Report; Cambria Water Master Plan

Dear Mr. Gresens:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Cambria Water Master Plan (EIR). We offer the following responses to your request for information:

1. NAME OF CONTACT PERSON: Martha Neder, AICP, Planner; San Luis Obispo County Department of Planning and Building; County Government Center; San Luis Obispo, CA 93408; (805) 781-4576
2. PERMITS OR APPROVAL AUTHORITY: The project is located in the Coastal Zone and will be subject to the County's approved Local Coastal Plan requirements. As the coastal permitting authority, the County of San Luis Obispo is a Responsible Agency under CEQA.
3. ENVIRONMENTAL INFORMATION: As stated in the Initial Study/Environmental Checklist, the draft EIR should analyze the potential of the project to conflict with the Local Coastal Plan requirements. Documents to be used include, but are not limited to the General Plan, Coastal Zone Land Use Ordinance, Annual Resource Summary Report, and Coastal Plan Policies.
4. PERMIT STIPULATIONS/CONDITIONS: Permit stipulations and conditions will depend on the specifics of the project.
5. ALTERNATIVES: Alternatives should address various levels of demand management, recycled water, and seawater desalination as part of the overall project or alternative designs that would decrease the potential of the project to conflict with Local Coastal Plan requirements.
6. REASONABLY FORESEEABLE PROJECTS, PROGRAMS, OR PLANS: A Public Review Draft Revised Project Description of the Cambria and San Simeon Acres Community Plans of the North Coast Area Plan (Draft Community Plan) has been released for public review and comment. The draft EIR should address this Draft Community Plan.

Mr. Robert Gresens, P.E.
Cambria Water Master Plan NOP
July 29, 2004

7. **RELEVANT INFORMATION:** San Luis Obispo Local Coastal Plan documents, Draft Community Plan, Annual Resource Summary Report.
8. **FURTHER COMMENTS:** The Projected Water Demands discussion in the Initial Study/Environmental Checklist contains assumptions for residents per household and water usage. The draft EIR should provide a detailed description of the basis for these assumptions.

Feel free to contact me at (805) 781-4576 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Neder', written in a cursive style.

MARTHA NEDER, AICP, Planner

PUBLIC COMMENT FORM**RECEIVED**AUG 2 2004
e BG
for PBF
file**PROJECT NAME:**

Environmental Impact Report (EIR) for Cambria Water Master Plan, CAMBRIA COMMUNITY SERVICES

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Vern Kalshan, 440 Kerwin, Cambria, CA 93428

Telephone Number: 805-927-1222**COMMENTS:**

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted at the Scoping Meeting or mailed to the Cambria Community Services District, P.O. Box 65, Cambria, CA 93428-0065, Attention: Bob Gresens, P.E., District Engineer.

The toxic effects to marine life to be caused by the currently designed desalination plant should be studied.

The design of the desalination plant should include a system for diluting the discharge with additional sea water before it is released into the ocean; and, this dilution system should also be studied in the EIR.

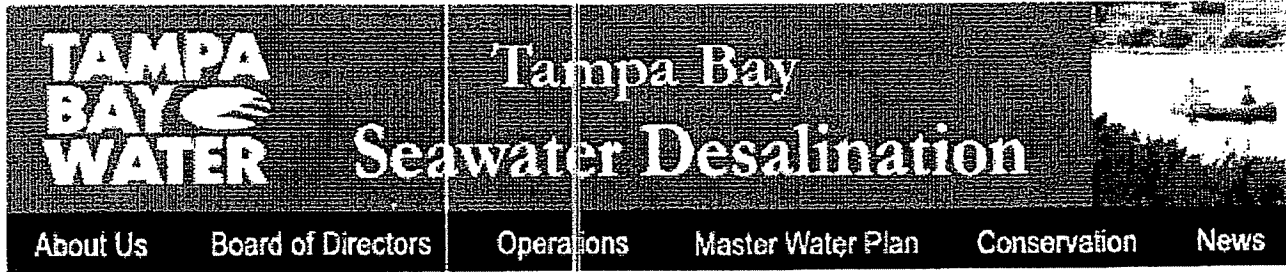
Please notice Tampa Bay Seawater Desalination (attached) where they dilute the discharge 70 to 1 so that the salinity of the discharge is only an average of 1.0 to 1.5 percent higher than the ambient salinity of the sea water at the point of discharge; and, they also have an alarm system that warns them if the discharge gets near its 10 percent maximum allowed variance from the ambient salinity.

The engineering department should also consult with John Alexander of the abalone farm on other methods of developing potable water in addition to the projects that were listed in the staff report.

Thank you for reading my comments.

July 31, 2004

Vern Kalshan
Vern Kalshan



[Introduction](#) | [Project Overview](#) | [Desalination Background](#) | [Environmental Protections](#) | [Project Schedule](#) | [FAQ's](#)

Environmental Protections:

Permitting

The Florida Department of Environmental Protection's (DEP) permitting process was lengthy and extensive. Over an 18-month period, DEP reviewed scientific research and public comments regarding the desalination plant and eventually more than 20 environmental and construction permits were required from local, state and federal agencies. The plant's operations plans have met or surpassed every requirement for every permit.

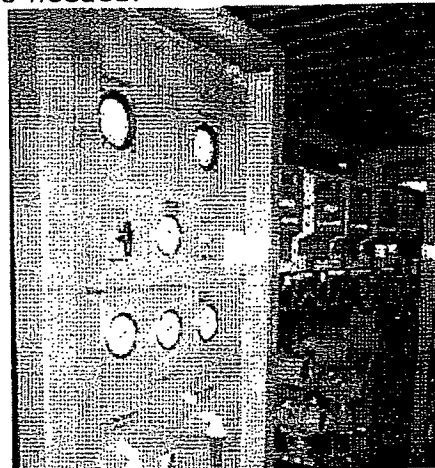
Other agencies, organizations and citizens concerned with protecting Tampa Bay, including the Agency on Bay Management, the Hillsborough County Water Team, the Audubon Society, the Tampa Baywatch and Tampa Estuary Program also reviewed and commented on submitted materials. None of the groups is opposed to the Tampa Bay Seawater Desalination facility

Safeguards

The plant will have two protection systems to monitor the salinity of the source water, desalinated drinking water and concentrated seawater discharged back into the bay. Measurements will be taken in several areas in and around the plant.

If the discharge being returned to Tampa Bay comes within 10 percent of the salinity limit established by the DEP permit, an early warning system alarm will sound, instructing operators in the plant to check the system and adjust it as needed.

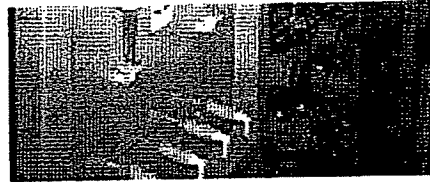
The plant's second alarm system will instruct plant operators to check, adjust and if needed, shut down affected areas of the plant if the salinity level of the discharge reaches the DEP's salinity discharge permit level.



Additional Annual Monitoring

Tampa Bay Water conducts ongoing permit-required and supplemental monitoring of the ecology of Hillsborough Bay and Tampa Bay near Apollo Beach to determine if

initial predictions on desalination plant environmental effects were accurate and adjust plant operations as necessary. Covanta also performs on-going, additional facility intake and discharge monitoring.



Tampa Bay Water is also conducting a \$945,000-a-year monitoring program, the Hydrobiological Monitoring Program, to determine the cumulative effects of its Master Water Plan projects, including the desalination plant on Tampa Bay, the Tampa Bypass Canal, McKay Bay and the Alafia River. This monitoring program examines parts of all four bodies of water to assess any impact on marine life and compare conditions before and after Tampa Bay Water's new surface water projects and desalination plant became operational. Tampa Bay Water will make immediate adjustments, including shutting down the desalination plant, if negative changes are detected.

Tampa Bay's Salinity

Although the plant's discharge is roughly twice as salty as Tampa Bay, it does not increase the bay's salinity because it is diluted 70-to-1 in up to 1.4 billion gallons of cooling water per day from Tampa Electric's Big Bend Power Station before being discharged back into the bay. When discharged, its salinity is, on average, only 1.0 to 1.5 percent higher than Tampa Bay's. This slight increase in salinity falls well within the natural, yearly salinity fluctuations of Tampa Bay, which vary from 16 to 32 parts per thousand, or by up to 100 percent, depending on the weather and the season.

A Cumulative Impact Analysis for Master Water Plan projects that used a desalination plant with twice the production capacity (50 mgd) of Tampa Bay Seawater Desalination as its model found that even if all of Tampa Bay Water's proposed Master Water Plan projects were implemented simultaneously, the salinity of Tampa Bay would still not increase beyond its normal, seasonal variations.

A U.S. Geological Survey of the Big Bend Power Station area determined that salinity will not build up in Tampa Bay because it flushes often. "Water Transport in Lower Hillsborough Bay, Florida, 1995-1996," found that each time the tide changes, more than 200 times as much water enters or leaves the bay as circulates through the power plant. The report also found that enough water flows in and out of the bay system near Big Bend to properly dilute and flush the plant's discharges, further preventing any long-term salinity build-up.

Pilot Plant Tests

To ensure the protection of Tampa Bay, a pilot plant, 1/1000th the size of Tampa Bay Seawater Desalination was built to test plant operations and identify any potential adverse environmental impacts on the bay.

Separate, independent studies were conducted by the following organizations using the pilot plant:

- Mote Marine Laboratory,
- Danish Hydraulic Institute,
- University of South Florida (USF),
- Savannah Laboratory/STL Precision,
- Marinco Laboratory, and

- Hillsborough County.

Each study was approved by the Florida DEP and conducted in accordance with DEP methods by a DEP-approved laboratory.

Each study examined the possibility of a specific, potentially negative environmental impact on Tampa Bay. Researchers studied the nearfield (close to the desalination plant) and farfield (areas away from the plant such as Hillsborough Bay). And, each study concluded that the desalination plant would produce high-quality drinking water without hurting the bay's water quality or marine life.

Salinity

Mote Marine Laboratory and the Danish Hydraulic Institute performed salinity studies using a pilot desalination plant, 1/100th the size of the Tampa Bay Seawater Desalination facility. To measure actual salinity changes in Tampa Bay, scientists from Mote Marine Laboratory collected data during the 2000-2001 drought. The unusually small amount of freshwater entering the bay because of the severe drought was combined with a worst-case power plant operations scenario (only two of four of the power plant's condensers working), and operational data from the pilot plant were used to determine potential long-term salinity changes in the bay. Based on Mote Marine Laboratory's research, the Danish Hydraulic Institute reported that, under these extreme conditions, a 2.5 percent increase in salinity is predicted in the area closest to the power plant and desalination plant, which quickly dissipates.

Biological

Marinco Laboratory of Sarasota tested the toxicity levels of saline-sensitive animals such as mysid shrimp and Gulf silverside fish using concentrated seawater from the pilot desalination plant at a dilution ratio of 1:1 (one part seawater concentrate to one part "normal" seawater). Researchers found no long or short-term increase in mortality at the 1:1 dilution level, leading them to conclude the plant would not harm saline-sensitive marine life. Under normal operating conditions, the dilution for the seawater concentrate will be 70:1 and 18:1 or 36:1 with two or three of Big Bend's cooling units out of service.

Chemical

Savannah Laboratory/STL Precision of Miramar, Florida, conducted tests to determine if undesirable chemicals already in Tampa Bay, which could harm water quality or marine life, at higher levels, would be concentrated in the desalination process and discharged back into the bay. Researchers tested the discharge from the pilot plant for 200 compounds, none of which exceeded the Florida Department of Environmental Protection's water quality standards for Tampa Bay.

Circulation and Dispersion in Tampa Bay

The University of South Florida (USF), with Dr. Mark Luther as the principal investigator, studied the bay's circulation to determine if desalination-related changes in salinity could change the currents in Tampa Bay. (Saltwater is heavier than freshwater so changes in salinity could affect the bay's currents and the time it takes to flush the bay.)

Focusing on the farfield (areas away from the power plant and desalination facility), USF

Tampa Bay Water (727) 796-2355

7/31/04 3:45 PM

researchers found that desalination plant-related changes in the bay's salinity were so slight, that even if all of Tampa Bay Water's current water projects were to be implemented simultaneously, "There is no reason to suggest that the flushing time of the bay would be altered in a significant way."

In other words, because the salinity of the bay normally varies widely – from 16 parts per thousand to 32 parts per thousand – depending on the weather and season, any change in its salinity linked to the desalination plant, even if all of Tampa Bay Water's current Master Water Plan projects were implemented simultaneously, would fall well within this range of salinity and, therefore, have no effect on the currents, circulation or flushing of the bay.

Hillsborough County's Independent Study

Hillsborough County's own, independent study into the potential environmental impact of the desalination plant concluded that, "The marine ecology of the areas of major biological concern will not be affected by the desalination facility operations."

[Introduction](#) | [Project Overview](#) | [Desalination Background](#) | [Environmental Protections](#) | [Project Schedule](#) | [FAQ's](#)

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RECEIVED
 AUG 04 2004
 RBF CONSULTING

Cambria Community Services District
 C/O Robert Gressens
 Post Office Box 65
 Cambria, CA 93428-0065

August 1, 2004

**RE: Cambria Water Master Plan – Notice of Preparation
 Initial Study/Environmental Checklist – June 2004(JN 10-100273)**

Dear Mr. Gressens:

Thank you for sending Greenspace-the Cambria Land Trust the Notice of Preparation of a Draft Environmental Impact Report (NOP) by the consulting firm RBF Consulting. You have invited us to make comments on the above referenced document and as a community organization representing over 1,200 members we are happy to oblige your request.

Project Description. 2.2 Background and History

This section fails to mention the State Water Resources Control Board (SWRCB) permit #1624 and the implications of water diversion as it pertains to modifying the permit based on public interest terms and conditions as well as other conditions that affect this NOP. An analysis of this permit is essential to the Water Master Plan and ALL the environmental analysis required on each and every potential water source mentioned in the Kennedy/Jencks Water Supply Alternatives (April 2003). While the Kennedy/Jencks Report attempted to cover a number of water sources the report was flawed regarding meaningful analysis of each source. It is required that this NOP will analyze each of the Kennedy/Jencks water sources.

Further, the discussion of the Habitat Conservation Plan that the Cambria Community Services District (CCSD) is required to complete before any Water Master Plan can be legitimately produced is not discussed or a timeline mentioned as when an HCP will be, again, budgeted for by the CCSD. It is our understanding that an HCP was scheduled for completion by 2000 and that \$100,000 was budgeted by the CCSD to complete this task. As a matter of fact, a complaint regarding water diversion by the CCSD from Santa Rosa Creek is pending based on the completion of an HCP. Please see SWRCB document 363:WV:262.0(40-28-02) order WR 89-19 and permit 20387 (application 28158) for details.

RICHARD HAWLEY
 EXECUTIVE DIRECTOR

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 Cambria, CA 93428
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 rick@greenspacecambria.org
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THE GREENSPACE BOARD OF DIRECTORS

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Project Water Demands

An analysis of the USGS Report by Gus Yates titled, Hydrogeology and Water Resources of the Cambria Area, San Luis Obispo County, CA is required in this discussion and any analysis of water use and availability in the Santa Rosa Creek watershed. The North County Area Plan Update EIR is another useful document that addressed water demand. The NOP does not mention any reference to selling water to other users outside the Cambria Community Services District. San Simeon and California State Parks and Recreation for instance. The Water Master Plan is required to include any foreseeable project that the CCSD has been contacted about with public and private concerns. It is our understanding the CCSD changed the capacity of the proposed desal plant by tampering with the allowable EDU's for single-family residences by over 50%. By increasing the allowable EDU's the CCSD has increased the cost of each and every one of the potential sources of water that the Water Master Plan is required to conduct an environmental analysis on. It is in the public's best interest to analyze EDU allocation increases made by the CCSD from the old EDU's to the increased allowable EDU's.

Water Distribution System

An analysis of expanding above ground storage in steel tanks is needed in this section. The costs of constructing a number of million gallon storage tanks seems to be more cost effective and environmentally sound than some of the alternatives mentioned in prior reports.

Water Supply Alternatives

The technology already exists to treat wastewater to almost potable standards. An analysis of wastewater that has been subjected to Reverse Osmosis and ultra-violet treatment and put the treated water underground to percolate through the soil and be reused in Cambria's distribution system is not mentioned in this section as a viable alternative. Please refer to El Segundo's West Coast Basin Water District as a model for this cost saving and efficient use of public funds and natural resources.

2.3 Project Characteristics

This section predisposes that Desalination is the most resource efficient and cost effective method of long-term water for Cambria and therefore prejudices the Environmental Impact Analysis of a Water master Plan. All potential water sources need to be included.

Recycled Water System

An analysis of making highly treated wastewater into potable water is missing in this section. (See 'Water Supply Alternatives').

Water Demand Management

This section is not compatible with the increased EDU allocation that the CCSD has recently enacted that increases water consumption. This section seems to be based on fiction. This section of the NOP is not consistent and is misleading.

2.4 Project Objectives

If the NOP does not analyze each and every alternative long-term water supply for Cambria then it is flawed from the beginning. CEQA is very clear on procedure and process. We suggest that each water supply option be thoroughly environmentally investigated and each potential water delivery project inside and outside the CCSD Urban Services Line is included in this study.

3.0 Initial Study Check List

Item number 8 is not adequate or descriptive and needs to be recirculated to interested parties as it is meaningless as presented. We consider this a major procedural flaw.

Item number 9 needs to include the San Simeon Creek watershed and any other agency or private party that is currently in negotiations with the CCSD or with projects that are anticipated by the CCSD or any other agency that deal with water use. The number of visitors per annum is incorrect.

3.2 Environmental Factors Potentially Affected

There are many impacts involved with Water Master Plans. Traditionally, most have been land based but since one of the potential alternatives is desalination a new list of ocean based impacts needs to be developed and circulated to interest groups. Exactly what will this report be looking at regarding toxic discharge into ocean waters that are considered to be included in the public trust? We consider the NOP to be inadequate until an adequate definition of investigation is described in this area. This study has the potential to be seriously flawed unless this topic is adequately scoped.

3.3 Evaluation of Environmental Impacts

See 3.2. As an example of environmental impacts not, to our knowledge, ever analyzed heretofore, would be the decreased capacity of near-shore waters to absorb CO₂ when unknown amounts of known and unknown substances are discharged into the ocean as would be the case with desalination. How this might affect near-shore fisheries and potentially increase temperatures locally and add to the overall affects of global warming. Since some of the projects for long-term water require substantial energy requirements that will cause pollution in areas not associated with the project a discussion of how to financially compensate and or mitigate the affected party or property is required under CEQA.

4.1 Aesthetics

The NOP states that whatever the project may be it will not have a less than significant impact on scenic vistas. This makes it sound like the project has been predetermined.

4.2 Agricultural Resources

Any growth inducing water project under the guise of a Water Master Plan has potentially significant impacts. The CCSD has already instigated litigation against the entire San Simeon Creek Watershed, destabilized the agriculture community and forced ranchers and farmers to become involved in protecting their livelihoods from a 'water grab mentality' CCSD. Furthermore, the CCSD is negotiating with others (San Simeon and State Parks and Recreation) to transport water to areas outside their influence and on agricultural lands. Items B and C would have significant impacts.

4.4 Biological Resources

Item f may have impacts since the HCP has not been written or adopted, but must be complete before this document moves forward. As stated before, the CCSD is required to complete a HCP on Santa Rosa Creek and San Simeon Creek before a legitimate Water Master Plan can be written and certified.

4.6 Geology and Soils

Item a. 1) is speculative and is in question based on recent earthquake activity. New seismic studies being conducted by the RWQCB may indicate that publication 42 is antiquated.

4.7 Hazards and Hazardous materials

Item e and f, there are three airports located within the project potential influence: The Hearst airport, Rancho San Simeon, and the Poteete airstrip.

4.9 Land Use and Planning

Item c, the project may have potential significant impacts with the to be written HCP.

4.12 Population and Housing

Items b and c; while reducing the buildout scenario within the CCSD urban growth boundary has benefit to the Monterey pine forest it does create the displacement of low-income housing and service workers by creating higher values for water meters. It creates the situation where a water meter has more value than the house it is associated with. The CCSD is directly responsible for removing low-income housing from the area

by water meter transfer policy. This policy has resulted in the migration of low-income families to other areas of the county and has increased the amount of traffic and consumption of natural resources by people forced to commute long distances to maintain their employment.

4.13 Recreation

The project would facilitate planned parks in urban areas that have not the infrastructure to support increased use.

4.15 Transportation/Traffic

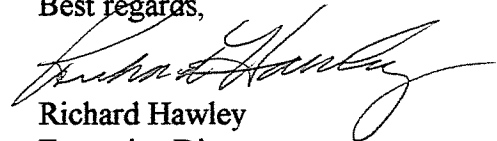
Adding new water to a system will have significant impacts on item a, b, c, d, e, f, and g.

4.17 Mandatory Findings of Significance

Item c will produce potentially significant impacts on human beings both directly and indirectly. Pollution created in other areas to satisfy local demand for potential energy intensive projects, for example, will have impacts on others indirectly. The migration of people not able to afford potential increase in water rates may occur. This will increase commute time, the consumption of natural resources and affect the quality of life for many. Additionally, the waters of the ocean may become polluted to the point where it affects the health of people who use it recreationally and for food.

Thank you for the opportunity to respond to this NOP. We look forward to participating in this project.

Best regards,



Richard Hawley
Executive Director

CC: RBF Consulting; Congresswoman, Lois Capps

April 17, 2004

To: Board of Directors, Cambria Community Services District

From: Patrick Milburn, marine and developmental biologist.

Re: Concern over the probable environmental impact of the "supersalination" return flow to the ocean of the proposed form of Desal for Cambria.

As a preface to my main comments, let me say that I have for many years been hopeful about desalination as an environmentally benign form of water production. This was when the technology was described as extracting both water and salts/metals from the ocean water, and separating the salts and metals for commercial sales. This may be beyond current economics and technology. The proposed Desal operation will involve removing 50% of the water from the intake stream, and returning the supersalinated water to the ocean environment.

Everyone who has had classes in biology has had lectures on diffusion and osmosis. Many, if not all, will have seen in labs what happens to cells that are placed in low-salt or high-salt conditions. The cells placed in very low salt conditions rapidly swell and burst. The cells placed in high-salt conditions shrink, steadily contracting, finally losing most of their water to their high salt environment. These are common observations with which most people are well familiar. It is part of common knowledge.

Having managed an artificial sea water system for marine culture for college biology classes, I have seen the effects of hypersalination on marine organisms, generally when serious mistakes had been made. Some groups of organisms are particularly sensitive to irreversible damage through hypersalination. Among the most sensitive are the echinoderms (the starfish, sea urchin, sand dollar group) and the various groups of sea jellies (jellyfish and comb jellies). Planktonic organisms can be rapidly and irreversibly damaged by hypersalination especially the larval forms of nearly all groups of marine organisms.

With this as background, let us note that the hypersalinated water returned to the ocean environment from the Desal operation will be more dense than the surrounding water and will tend to settle.

As it is more dense, and there will be a steady stream of supersalinated water, a layer of more dense higher salt concentration will tend to accumulate along the bottom. All bottom dwelling organisms that are vulnerable to high salt concentrations will have their body water pulled from their tissues, to a degree dependent on the degree of supersalination.

This should have the effect of producing "dead" zones over the bottom in zones radiating outward from the outfall. I have heard reports that there are dead zones offshore from Diablo Canyon's Desal operation. I cannot confirm their existence, but they are what would be expected from this technology.

An environmental impact report should be mandatory before committing Cambria to probable environmental decline resulting from the use of this technology. Many Cambrians enjoy the marine environment, fishing, visiting the tide pools. It appears likely that the supersalination form of Desal will produce a long-term decline in the marine habitat radiating outward from the supersalinated outfall. This hazard should be subject to an EIR before committing the community to possible damage of the marine environment. Especially since once the contract is signed the community loses all oversight and control over the technology.

Later forms of Desal, when they become technologically and economically feasible, may not present such obvious dangers to the marine environment.

To summarize, the proposed form of Desal through supersalination of the marine habitat is not an environmentally sustainable form of water production.

W. Patrick Milburn, 795 Arlington St., Cambria, CA
Training in marine biology at Kerchoff Marine Laboratory
(California Institute of Technology) in Corona del Mar,
California, and at Hopkins Marine Laboratory (Stanford
University) in Pacific Grove, California. Formerly a member
of the faculty of biology while directing the marine culture
system, Carleton College, Northfield, Minnesota.

805-927-8179

These remarks concern the potential impact on the marine environment. After my remarks on April 17, 2004, a member of staff commented that in the preliminary EIR the eggs of the sea urchin were used as the standard for assessing the immediate and long-term effects of the increased saline outflow into the marine environment. Thus, to be clear, the eggs of the sea urchin, as they have been found to be the most sensitive biological materials for this testing, are treated as proxies for the entire marine ecosystem in the ever widening area of the outfall of increased salinity. A more wise and prudent course would be to do two kinds of studies: 1) have a oceanographic chemist (a physical chemist of the marine environment) use a computer model to estimate the probable effects of the increased salinity from the outflow of the desalination process; and, 2) have an environmental experiment done on a marine environment very similar to that offshore of Cambria and San Simeon. The goal of this trial would be to test the effect of the increased salinity of the outfall on the microbes, the planktonic organisms in the area, and the benthic (bottom dwelling) fauna, especially those most sensitive to changes in salinity like the echinoderms, but also the polychaet worms which form such an important part of the subtidal ecosystem. While organisms in the tidal zone are more physiologically adaptable, the organisms in the subtidal zone, some distance out from the shore, are more likely to be adversely impacted by the heightened salinity.

AUG 02 2004

W. Patrick Milburn

From: "Kathy Choate" <kchoate@cambriacsd.org>
To: "Glenn Lajoie (E-mail)" <gal@rbf.com>, "Bob Gresens" <bgresens@cambriacsd.org>
Date: 8/2/04 9:45AM
Subject: FW: comment on Environment Impact Report

Forwarding comments to you. Kathy

-----Original Message-----

From: elizabettenhausen [mailto:elizabettenhausen@netzero.net]
Sent: Monday, August 02, 2004 9:23 AM
To: Kathy Choate
Subject: comment on Environment Impact Report

2 August 2004

TO: Cambria Community Services District Directors Cobin, Chaldecott, Funke-Bilu, Sanders, Villeneuve;
General Manager Rudock; District Engineer Gresens

The U.S. Commission on Ocean Policy issued its Preliminary Report earlier this year. On June 3, 2004, Governor Arnold Schwarzenegger wrote to the Commission. Under "Stewardship" he said, "The Commission's Preliminary Report recommends that ecosystem management be a guiding principle for ocean and coastal management. I applaud this approach, particularly the emphasis on the need to address the connections between land and sea." The Report and the Governor's response emphasize the need for a new ocean policy that attends to the ecological well being of the inseparable ocean and coast.

Cambria again has an opportunity to take the lead in developing a water policy that includes careful analysis of the ocean-coast ecosystem.

I have read the "Initial Study/Environmental Checklist" for the Cambria Water Master Plan (on file at the Cambria Library). Section 2.1, Project Location and Setting (p. 3) does not yet pay attention to this emerging commitment in the United States. I propose this paragraph:

The village of Cambria lies in central California along the Pacific Ocean, in Santa Rosa Creek Valley, near San Simeon Creek and the Santa Lucia Mountains. Cambria, in the northwest of San Luis Obispo County, looks out on the Monterey Bay National Marine Sanctuary. San Simeon State Park constitutes some of the beaches at Cambria and service areas inland on the community's northern edge. Ranches and farms adjoin the town. Acres of conserved land form much of Cambria.

In "Water Supply Alternatives" (p. 9), the specific form of "a subsurface seawater intake" is missing. Is the option of a well on the beach or near the beach still a possibility? If beach wells are chosen, Section 4.1. Aesthetics (p. 23), Question a. should be marked under "Potentially Significant Impact," not "Less Than Significant." Perhaps the intake pipe directly from the ocean would need the same careful attention.

The perspective of this "Initial Study/Environmental Checklist" document does not see the ocean. Rather "seawater" meets its eyes.

The perspective tends to rely on official categories, rather than the imagination our future needs. For example, in Section 4.6 Geology and Soils, you'd think we've had no earthquakes since December except in the rupturing of a known earthquake fault. Watching the daily data on the maps certainly shows that ruptures here occur whether we humans know the fault or not.

I look forward to environmental analyses of specific elements of the Master Water Plan and to your invitation to the public to analyze them.

Sincerely,
Elizabeth Bettenhausen
345 Plymouth Street
<mailto:elizabethbettenhausen@netzero.net> elizabethbettenhausen@netzero.net
927-0659

PUBLIC COMMENT FORM

PROJECT NAME:

Environmental Impact Report (EIR) for Cambria Water Master Plan.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

*Aurika Wells, Resident Historian
of Harmony*

Telephone Number: *805/927-0750*

COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted at the Scoping Meeting or mailed to the Cambria Community Services District, P.O. Box 65, Cambria, CA 93428-0065, Attention: Bob Gresens, P.E., District Engineer.

As my article so directly subsumes every environmental issue/concern raised (regarding the Cambria Water Master Plan), I submit it to you in its entirety...

Aurika Wells

Like a rare and precious jewel strung on a golden strand and set to sparkle against the shining sea, Cambria continuously wrests with the threat of pirates ~ treasure seekers and greedy land-grabbers ~ ever craning from their well-polished crow's nests, poised to pounce and plunder. A desalination plant wouldn't need wave a black flag with skull 'n' crossbones: its very presence bellows, "Come on in! The water's fine!" (Strike up the theme from "Jaws.") Thank *God* for our long-time lack of ready water rights; it is the *reason* our paradise has thus far been preserved!

Apart from God, Cambrians owe their greatest debt of gratitude to the pioneering leaders, they who toiled with their hearts and hands, *generation after generation*, delivering to us the ecosystem, infrastructure and "community spirit" alive today ~ (even as telltale signs of a breakdown are becoming more apparent.) We diehards enjoy a delicately balanced habitat, one that struggles to foster its widely diverse inhabitants ~ from seniors to juniors, fauna to flora. Valiant efforts to bolster our blessed quality of life are ongoing, and all too often met with opposition or, worse, indifference. Still we try. (At least *some* of us do... let us say "the better half?")

Mark and Sally DiMaggio are current-day Cambrian pioneers, the first to build into their new home every earth-friendly, resource-conserving technology known to man. (More discoveries and clever designs have since materialized.) Now readily available are water-recycling systems (methods of capturing rain water, utilizing gray water, maximizing efficiency, etc.), systems that with, yes, some initial costs and inconvenience, can be installed within each person's own abode. And just as with retrofitting toilets and shower heads, it's an investment that can *only* render dividends, now and for always. But on a much greater scale. I propose the CCSD:

- PROVIDE FUNDING and/or interest free loans to citizens who would endeavor to implement proven water-and-energy-saving systems/devices
- PUBLICLY NOTICE those who do (and put on red alert big-time water guzzlers)
- MANDATE WATER-RECYCLING SYSTEMS in every new development

Once in place, the reduced level of water consumption reflects *across the board*, a higher mantle shared by the *entire community*. (And with no hidden daggers such as "runaway development" and "unanticipated operational expenses.") Immediate returns are realized in the form of relief-from-painful-bills plaguing the beleaguered Cambrian, he who lives with more conscience than cash flow; the long-term gains immeasurable, both to the individual and the township. And as for all those who'd worm their ways into Shangri-La heaving sacks of money but without a pittance of consideration for the countless others who made it what it is today? Let our Pro-Cambrian Program deliver *this* choice message: "YOU CAN GO STRAIGHT TO --"

Caring, conscientious citizens *desire* to serve and preserve their communities, just as have they who came before. These are "keepers." Whether they've lived here for ages or are just moving in, such folk will be the *first* to employ energy-saving efficiencies in their homes and businesses, "a program made possible by Cambria Community Services." Now *that's* what ya' call a true service to the community!

(Article written for The Cambrian)

Public Comment: EKR

RECEIVED

AUG 03 2004

CAMBRIA COMMUNITY SERVICES

Cambridge Community
Services District
Attention: Bob Green

RECEIVEDC: 60
RBF - fav
w/c

To: Cambria Community Services District

AUG 2 2004

From: Brad Seck

CAMBRIA COMMUNITY SERVICES

Subject: Comments on the Notice of Preparation for EIR of the Water Master Plan.

As the community updates its Water Master Plan there are three areas of concern that should be included in the Environmental Review Process: Cross Connection from auxiliary water supplies, The corrosion potential of existing and future water supplies, and a local native plant restoration program.

Over the last ten years the number of auxiliary storage facilities have dramatically increased. Residents are capturing rain water, re using grey water, and bringing in CCSD treated effluent for landscape irrigation. This trend will only increase as the community faces continuing droughts, higher populations, and more expensive water treatment. What is being done to prevent these non potable water sources from siphoning back into the community's water mains.....and potentially infecting downstream residents?

Potable water that is corrosive can cause serious health and economic problems for its users. Corrosive water can literally dissolve asbestos cement water mains and leach heavy metals from residential service lines. It may be recognized by CCSD officials that the proposed desalination water will need to be treated, but it is not clear if current supplies have been fully evaluated for corrosion. An easy way to address this issue is to review lead and copper sampling records. The lead and copper rule has been implemented for several years and it should have given the District an opportunity to sample every critical location in the community water supply. If there are any gaps in the sampling protocol now is a good time to cover those locations that haven't received attention. Also, look for the specific areas that are persistently detectible and/or elevated. Even if the concentration levels do not currently exceed state limits they undoubtedly will increase when the community is introduced to blended desal water. The District could begin to treat the system minimally with approved compounds to see if contaminant levels can be reduced.

Identifying and treating potentially troubled areas now will provide CCSD staff with invaluable information for dealing with corrosion as the community seriously ponders desalination as a potable water supply.

What is the district currently doing to fully protect Cambria's water system from corrosion?

Over the years the Monterey Pine Forest has been decimated from development and fuel reduction policies within the residential neighborhoods. When native vegetation is removed residents perceive a void and quickly plant vegetation that requires more intensive landscape irrigation. To mitigate this growing trend the CCSD could implement a Native Plant Restoration Program. There are two conservation organizations that are currently propagating and planting native vegetation. Financial support from the CCSD would expand this activity and provide more native plants to the community. Once established, local native vegetation requires no landscape irrigation during the dry season.

What is CCSD currently doing to explore this water saving concept?



Cambria Community Services District

P.O. Box 65 • 1316 Tamson Drive Suite 201 • Cambria CA 93428
Telephone (805) 927-6223 • Facsimile (805) 927-5584

Fax

To: Glenn Lajoie, RBF Consulting **From:** Kathy Choate

Fax: 949-837-4122 **Pages:** 2 including cover

Phone: 949-855-3663 **Date:** August 2, 2004

Re: NOP EIR WMP comment

- Urgent** **For Review** **Please Comment** **Please Reply** **Original to Follow by Mail**
-

From: "Kathy Choate" <kchoate@cambriacsd.org>
To: "Glenn Lajoie (E-mail)" <gal@rbf.com>, "Bob Gresens" <bgresens@cambriacsd.org>
Date: 8/2/04 9:06AM
Subject: FW: Comments on Water Master Plan Initial Study/Environmental Checklist

Dear Mr. Horvath,

Thank you for your comments. I'm forwarding them on to RBF Consulting and our District Engineer Bob Gresens.

Sincerely,
Kathy Choate
District Clerk
Cambria CSD
PO Box 65
Cambria, CA 93428
Tele: 805-927-6235
Fax: 805-927-5584

-----Original Message-----

From: Robert Horvath [mailto:mahorvath@sbcglobal.net]
Sent: Sunday, August 01, 2004 9:31 PM
To: Kathy Choate
Cc: bhorvath@lacs.d.org
Subject: Comments on Water Master Plan Initial Study/Environmental Checklist

August 1, 2004

Cambria Community Services District
PO Box 65
Cambria CA 93428

Thank you for the opportunity to comment on the Initial Study/Environmental Checklist for the Cambria Water Master Plan, dated June 2004. I support the development of the Cambria Water Master Plan as a critical need for the community of Cambria, to be completed at the earliest possible date. My detailed comments are as follows:

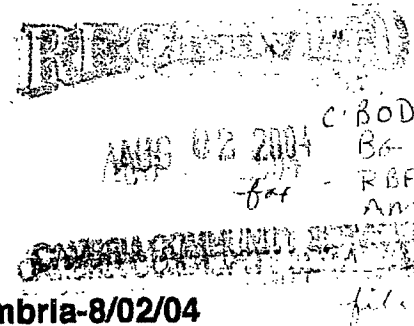
1. The project should be sized for projected water demands of at least the Coastal Permit maximum of 5250. CCSD has been stalled on the development of an augmented water supply for almost two decades while various plans have been proposed and dropped. It will likely be decades before such an effort is repeated. The extraordinarily slow pace of getting anything done on a water supply project by CCSD demands that the largest reasonably sized project be pursued that will not be further delayed by controversial permitting issues.
2. Table 6 (Evaluation Matrix) shows water quality for all desalination alternatives rated as a "1", meaning very poor. Water produced from a desal plant should be the highest quality (rating 5); with its low total dissolved solids concentration being blended into the existing supply, overall water quality will improve, far better than any other supply alternative. (Even if this factor is meant to take in some consideration of ambient water quality of surface waters, the impact of a desal plant is minimal, merely returning salt to the ocean from which it came, which is less of an impact than removal of water from fresh water lakes like Nacimiento.)
3. In Table 8, I do not understand why Shamel Park is listed among the less likely sites. It is so close to the wastewater treatment plant that it should be easily served, and Title 22 water is perfectly suited for the lawns of the park.
4. Section 2.5 indicates that seawater desalination will take 4 to 5 years to complete. Although this schedule might not be considered unusually long, the current lack of an adequate water supply should be considered a major existing environmental impact that should be mitigated by the fastest possible schedule. If there were another proposed project in Cambria that would adversely impact the water supply, it would be considered an extremely significant environmental impact requiring the strongest mitigation. Yet inaction or slow action having the same effect seems to be ignored with regard to its environmental

impact. The Water Master Plan should include a project alternative that accomplishes completion of the water supply augmentation at the earliest possible time. For example, the alternative could incorporate a Design-Build or Design-Build-Operate approach to bring the desalination plant into operation at the earliest possible time; the city of Sacramento recently used a similar approach for a biosolids pelletizing facility.

I would appreciate you keeping me on the list of interested parties for any notices about the Water Master Plan. Thanks again for the chance to comment.

Robert W. Horvath
6183 Lawrence Street
Cypress, CA 90630
714/826-3225
562/908-4209 (work)

CC: <mahorvath@sbcglobal.net>



To: Cambria Community Services District

Re: Public Comment on the Notice of Preparation of Environmental Impact

Submitted by Lynne Harkins 1730 London Lane/POB 606, Cambria-8/02/04

1. In the scoping of any EIR and certainly before going forward with the Project Cooperative Agreement with the Army Corps or the awarding of construction contracts for a seawater desalination project, it is this citizen's contention that the CCSD Board needs to adopt and to be guided by the doctrine of public trust which advocates for the protection of the "commons". The "commons" include not only the ocean water that would be drawn into the proposed desalination facility, but the wildlife that will be affected by its construction and operation, with on-going intakes from and discharges into the marine environment. The highest and most rigorous environmental review standards must apply in a case, such as seawater desalination, involving the resources of the public trust. It is critical that every possible measure be taken to avoid harm to the "commons". Therefore, it is reasonable to assert that any entity which seeks to engage in activities that involve the resources of the public trust must first show complete and compelling evidence that such proposed activities will do nothing to harm the commons that are to be affected. It is vital that Cambria consider all risks and possible impacts to our ocean waters, endangered species and to the nearby wetlands and endangered species' habitats before proceeding with any water project, but especially desalination.

Of special concern is the sea otter. Last year set a record for southern sea otter deaths and 40% percent of the deaths involved disease. There is evidence that sea otters are becoming more vulnerable to disease as a result of having their immune systems compromised by chemical and biological contaminants. Some of these chemicals that are immunosuppressant will be concentrated in the effluent discharged from a desal plant. These chemicals biomagnify as they move from the base of the food chain into species that are in the sea otters' diet. Sea otters don't have body fat where these toxins might be sequestered and necropsies are revealing these compounds in the liver and other vital organs of sea otters found dead along the central coast -very possibly making them more susceptible to disease.

Will the toxic effluent from desalination harm the sea otter? The science about what is causing a crisis in sea otter health is not yet definitive; but unless the EIR can prove that the desalination process won't harm the sea otters, we must invoke the precautionary principle. Because extinction is forever, we must use common sense and exercise extreme caution in looking at the environmental impacts of desalination on this sentinel species. Either it's proven that no harm will come to sea otters or we simply don't do it.

2. Does Cambria have an Urban Water Plan? If we have 3000 hookups, shouldn't we have a UWP? Why aren't efficient water use strategies more pursued? Many are described in the Included copy of "Waste Not, Want Not - The Potential for Urban Water Conservation in California". If our sewer won't work with any less water than is currently in use, what would it take to fix that and wouldn't the environmental impacts of efficiency be less than any other water alternative?



Cambria Community Services District

P.O. Box 65 • 1316 Tamson Drive Suite 201 • Cambria CA 93428
Telephone (805) 927-6223 • Facsimile (805) 927-5584

Fax

To: Glenn Lajoie, RBF Consulting **From:** Kathy Choate

Fax: 949-837-4122 **Pages:** 2 including cover

Phone: 949-855-3663 **Date:** August 3, 2004

Re: NOP EIR WMP comments

- Urgent For Review Please Comment Please Reply Original to Follow by Mail
-