



SANTA LUCIA CHAPTER

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July 11, 2008

TO: SLO Local Agency Formation Commission

Comments on the PUBLIC REVIEW DRAFT, MUNICIPAL SERVICE REVIEW, CAMBRIA COMMUNITY SERVICES DISTRICT

#1

We are writing out of concern over the Commission's reliance on the CCSD's Program EIR for the Water Master Plan as summarized on pp. 16 -22 of the MSR.

We wish to draw to LAFCO's attention serious defects in the Program EIR, as they pertain to several of your Determinations (pg. 10) and to your ability to provide information about a jurisdiction's service capabilities and determine the appropriate extent of sphere of Influence.

The Commission's dependence on the information in the Water Master Plan Program EIR renders problematic LAFCO's ability to address Service Review factors such as present and planned capacity of public facilities and adequacy of public services including infrastructure needs or deficiencies, the financial ability of agencies to provide services, and accountability for community service needs.

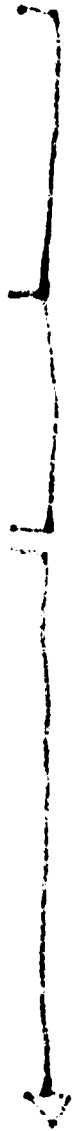
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It should be a matter of concern that the state and national average for water consumption is 95-100 gallons per capita per day, Cambria's average consumption is 90 gpcd, but the Master Plan proposes that this be increased to an unsustainable 135 gpcd, based on a concept, never defined, that the draft EIR refers to as a "quality of life" bonus. This apparently entitles one to 50 percent more water per year than what would be calculated otherwise from the baseline set in 2000 by the Coastal Commission for limiting diversions from Santa Rosa and San Simeon Creeks. Without this "bonus," Cambria's future water needs can be met by water reclamation and recycling, conservation and local storage. (This conclusion requires updating the CCSD's baseline water supply figures from the ones used in the EIR to reflect the fact that, after the baseline was established, Cambria gained access to water from retired ag irrigation rights in both its water basins.)

The Otter Project, Greenspace-The Cambria Land Trust, ECOSLO, Surfrider Foundation, the Desal Response Group of Environment NOW and the Sierra Club submitted comments on the Water Master Plan that pointed

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this out, as well as the following imminent violations of the California Environmental Quality Act contained in the Water Master Plan's Draft EIR:

- No evaluation of the cumulative impacts of the project's contribution to increased traffic, population, urban footprint, air pollution, demands on public services, etc. Impacts are considered only within separate categories -- Land Use, Biological Resources, Water Resources, etc. -- minus the legally required evaluation of the impacts of a change in land use on biological and/or water resources.
- No description or analysis of changes the project will bring (i.e. 864 new water connections and homes built).
- No numeric targets for easily achievable reductions in indoor water use or requirement for natural landscaping, which would require no fertilizer and no additional water.
- No acknowledgment that replacing potable water with recycled water for landscaping and irrigation would, conservatively, reduce by 15 percent the water drawn from the aquifer.
- No semblance of objectivity in scoring possible long-term water supply strategies, with desal jiggered to come out on top despite the fact that local, smaller scale, less expensive, easier-to-permit projects could provide additional water for both residents and groundwater supply if designed appropriately.

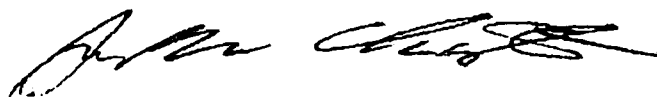
We pointed out the numerous public sources for funding of water recycling and conservation programs that the draft EIR omitted, making it appear that public funding of a desal plant is a virtual certainty by comparison.

We have little confidence that Cambria's growth will stop at 4,650 connections given that the desalination plant would 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.

We concluded that 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.

In trying to make the case for desalination without fully assessing its environmental impacts, the CCSD repeatedly runs afoul of the legal requirements of the California Environmental Quality Act throughout the Water Master Plan's Draft Environmental Impact Report.

Thank you for your attention to these concerns,



Andrew Christie
Chapter Director

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