CCSD's Pending Application for a Regular Operating Permit Should not be Delayed to Complete Additional Technical Environmental Studies

Opponents of the CCSD's pending application for a regular operating permit for the Sustainable Water Facility assert that the application should be sidetracked until the completion of an in-stream flow study of San Simeon Creek. There is no reason to delay the permit application awaiting completion of this technical study.

Alternative Solutions for Cambria's Water Shortages Have Been Studied Nearly to Death

A brief history of the considerable degree by which the CCSD has "studied" solutions to its chronic water shortage problem puts the assertion that we need more studies in an appropriate context.

In a 2013 report to the CCSD and the Army Corps of Engineers on alternative solutions to Cambria's chronic water shortages, consulting engineer CDM Smith described background studies that preceded its work including the CCSD's extensive water master planning process from 2004 to 2008 and an extensive study of a seawater desalination solution going back to 1993.[1] However, the CCSD did not begin searching for and studying potential supplemental water supplies in 1993. It did so much earlier. The Executive Summary of a June 2004 Report of Kennedy/Jenks Consultants as part of the CCSD's Water Master Plan states as follows:

> Potential water supply alternatives were compiled from . . . studies conducted in *the last twenty years* identifying and evaluating potential sources of additional potable water for CCSD.[2]

Therefore, the CCSD has studied alternative solutions for its long-term water shortage problem going back to at least 1984–*thirty-six years ago*! Cambria doesn't need more studies that will further delay processing its application for a regular operating permit, it needs to proceed with the permit so it can use the SWF to secure Cambria's water future.

The CCSD's Preeminent Expert Consultants Have Assessed the SWF and the Facility's Permit Should Not be Delayed Pending a Complete In-Stream Flow Study.

The historical discussion above does not mean that the CCSD has decided to abandon its commitment to maintain the highest environmental standards for the SWF. Far from it. For example, CCSD engaged the renowned national engineering and consulting firm Michael Baker International, which specializes in environmental issues associated with water treatment projects, to assess environmental impacts of the SWF. MB produced an exhaustive Subsequent EIR in 2017 that fully complies with the California Environmental Quality Act and Coastal Act. Further, when the Coastal Commission later raised questions about the location of parts of

[1] 2013 *Cambria Water Supply Alternatives, Engineering Technical Memorandum.*

[2] June 2004 *Final Report, Assessment of Long-Term Water Supply Alternatives, Executive Summary,* CCSD 2008 Water Master Plan Program EIR, Task 4.

the SWF within an Environmentally Sensitive Habitat Area (ESHA), the CCSD engaged Cindy Cleveland, principal biologist and owner of Cleveland Biological LLC and an expert in habitats of the Central California Coast, to assess the ESHA issues and discuss them with the Coastal Commission's biologist. The CCSD has a history of engaging superior environmental consultants to assure its commitment to the environment and there is no reason to believe it will not continue to do so.

As for the San Simeon Creek in-stream flow study currently at issue, the CCSD engaged Eugene "Gus" Yates, Senior Hydrologist at the consulting firm Todd Groundwater. Mr. Yates, a graduate of Harvard University and University of California, Davis, is a Professional Geologist and Certified Hydrologist, licensed by the State of California. He has extensive experience in groundwater and surface water hydrology, including bio-hydrology and water resources management. Mr. Yates has begun his work on the in-stream flow study.

That is not to say, however, that the flow study must be *completed* before the permit application can proceed. Consistent with other similar projects, the District has developed an adaptive management plan to monitor groundwater, surface water and natural habitats *after* the SWF has been permitted and is operating. Under the plan, the District would modify operations and processes to mitigate any environmental impact. Similarly, the in-stream flow study could, and should, become a component of the broader adaptive management plan which would allow the SWF to be permitted and commence operations while also protecting the environment.

Conclusion

Currently there is more than enough information to permit the SWF. The CCSD recognizes the San Simeon Creek environment is important and has demonstrated its commitment to a thorough understanding of the impact of its operations in the area. There have been numerous studies in the past and there will be more in the future. However, Cambrians need certainty about our water supply; it is time to press forward with the CCSD's regular operating permit.