

Using the SWF for Long-Term Water Security was not Bait and Switch

In order to impassion some Cambrians against the Sustainable Water Facility, the SWF's opponents claim that the CCSD promised the facility would always be used only during Stage 3 water shortages and never for long term water security. That was never the case. The bait and switch advocates ignore the project's origins, its history, its capabilities and the terms of the emergency permit itself. Further, the nefarious and conspiratorial suspicions promoted by project opponents about the change of the project's name from EWS to SWF is misplaced.

The Project Design that Led to the SWF was Intended as a Permanent Facility to Solve Cambria's Chronic Water Shortages

The origins of the SWF trace to a 2006 cooperation agreement between the CCSD and the Army Corps of Engineers by which the Army Corps undertook to identify and evaluate alternative solutions for Cambria's *long-term water shortage problem*. After more than seven years of investigation and evaluation, on November 27, 2013 the Army Corps' engineering consultant CDM Smith, issued its findings and recommendations in a document entitled: *Cambria Water Supply Alternatives Engineering Technical Memorandum*. The *Alternatives Memorandum* reflects that the engineers initially screened twenty-eight (28) projects from which eight (8) were selected for thorough evaluation. Of the final eight, the most highly rated was a reverse osmosis project that, with some relatively minor changes, became the SWF.

The significance of the history above is that all the projects, including the one that eventually became the SWF, were always intended to be permanent facilities to solve Cambria's chronic, recurring and often severe water shortages. None of the projects were intended to be temporary and none were purposed for emergency use only.

Because Cambria Faced a Desperate Drought in 2014, the CCSD Obtained a Permit and Designed and Constructed the Facility as the Emergency Water Supply Project

At the time the *Alternatives Memorandum* was presented in late 2013 Cambria, like the entire western United States, was in the midst of a prolonged and severe drought. In response, Governor Brown issued emergency proclamations to promote the construction of emergency water supply projects. In 2014, the CCSD took the opportunity offered by Sacramento and obtained from San Luis Obispo County an emergency permit for the plant, which it then designed and constructed in about nine months. Further, because the plant could be used to relieve the severe drought, the CCSD obtained from the state more than \$4 million in grant aid for the project.

Significantly, one important condition of the emergency permit, that project opponents choose to ignore, was that the CCSD must apply for a *regular* operating permit and

submit the facility to full environmental review under the California Environmental Quality Act and the Coastal Act. Therefore, contrary to the opponents' claim that the CCSD promised to maintain the emergency permit forever and never take steps to use the facility beyond Stage 3 emergencies, the emergency permit itself requires that it will be replaced by a regular operating permit requiring full environmental review—the same environmental review that applies to all significant public works of a *permanent* nature. The CCSD has complied with all conditions of the emergency permit, including completing an extensive environmental review of the SWF.

Having Designed and Constructed a Permanent Sustainable Water Facility, it Only Makes Sense to Obtain a Regular Operating Permit to Secure Cambria's Water Future.

The SWF is an elegantly designed and engineered facility which allows the CCSD to convert a mixture of brackish water and treated wastewater effluent into clean and safe potable water for Cambria's residents and businesses, especially during dry summer months. At the same time, the facility helps to preserve natural habitats by recharging the San Simeon Creek Lagoon and it helps to protect the aquifer from saltwater intrusion and subsidence, which benefits Cambria and the plants and animals that rely on the aquifer for life.

This is an appropriate place to dispel the notion that there was something sinister about the CCSD adopting the name Sustainable Water Facility sometime after it obtained the emergency permit and completed construction of the facility. First, the name Sustainable Water Facility arose at the suggestion of the District's environmental consultant, Michael Baker International, during discussions about the Subsequent Environmental Impact Report. Second, under any reasonable definition, as discussed above the SWF qualifies as an *environmentally sustainable facility*. Third, the facility's design conforms to two pillars of California water policy promoting water sustainability: the facility utilizes reverse osmosis *desalination technology* and, by converting treated wastewater effluent into clean, safe drinking water, the facility utilizes *indirect potable reuse*. The Sustainable Water Facility is appropriately named because it is, indeed, a sustainable water facility.

Seeking and obtaining a regular operating permit to use the SWF to do all of the above and to also avoid putting the town through severe hardships of future Stage 3 water shortages is not bait and switch, it's good local government.