From: <u>Crosby Swartz</u>

To: <u>BoardComment; Karen Dean; Tom Gray; Debra Scott; Harry Farmer; Michael Thomas; Ray Dienzo</u>

**Subject:** Public Comment on 1-30-23 Agenda Item 3.B Strategic Plan

**Date:** Monday, January 30, 2023 10:12:09 AM

Attachments: Public Comment 12-15-22 Agenda Item 5.D Engineering Report.pdf

I have two comments on the Strategic Goal to achieve approval of the WRF permit. This is on page 5 of the agenda package.

• The first task listed is to "Investigate and complete study for new cost-effective options and technologies for reduction/disposal of brine waste, including costs. Present a report to the Board upon conclusion of the study."

This is an important task that has not been completed. The Global Water Innovations pilot project could lead to a cost-effective solution, but there are other options that should be investigated at the same time. Ultimately, the District should select the most cost effective option for Cambria's specific requirements.

• My second comment about the goal to achieve approval of the WRF permit concerns the absence of discussion about the mitigation requirements for the WRF project imposed by the Water Master Plan EIR. During the permit approval process, the District should be prepared to answer agency requests for a progress report on implementation of required mitigation measures, including the Buildout Reduction Program.

My final comment is on the Strategic Goal to execute projects for the wastewater treatment system. This is on page 6 of the agenda package.

• I submitted a written comment at the December 15th Board Meeting (attached) about the impacts caused by a future failure of the effluent pipe from the WWTP to the San Simeon Creek percolation pond, near the same location as the recent water main pipe failure. This potential failure could shut down all District water and sewer operations until a temporary effluent pipe could be put into operation. We recommend the addition of a task to complete an emergency response plan to restore water and sewer service as soon as possible after an effluent pipe failure.

From: <u>Crosby Swartz</u>

To: <u>BoardComment</u>; <u>Karen Dean</u>; <u>Ray Dienzo</u>

**Subject:** Public Comment 12-15-22 Agenda Item 5.D Engineering Report

**Date:** Thursday, December 15, 2022 11:40:42 AM

The Utilities/ Engineering Report on page 22 of the agenda package lists the Description and Status of the San Simeon Well Field Water Main and Effluent Main Replacement Projects. Please add a report on the impact of an unexpected failure of the Effluent Main on the District's ability to provide sewer service, water service and fire-fighting water. An emergency plan for a temporary effluent main and purchase of long-lead components should be considered.

From: noreply@getstreamline.com

To: <u>Haley Dodson</u>

**First** 

Name:

**Subject:** New form submission assigned to you: Written Public Comment

Date: Wednesday, January 18, 2023 8:57:14 PM



# Written Public Comment

**Dennis** 

ivaille.	
Last Name:	Dudzik
Address:	Owner) (Bradford Road Property
Email:	
	Directors and Staff Let me begin by emphasizing that my wife and I are contributing and involved members of the Cambria Community. It just happens that we are "homeless property" owners, living in Eugene, and waiting to build our home on the Bradford Road property we have owned for over 20 years. As most of you know, I have been a frequent, supportive, and collaborative participant in CCSD Board meetings and Workshops for the 2021 and 2022 Strategic Planning efforts. I appreciate the magnitude and sensitive nature of the ongoing WRF Coastal Development Permit Application process; that it requires compliance with CEQA, consistency with Local Coastal Program policies, is currently on Information Hold pending CCSD staff response, and is subject to Coastal Commission approval/appeal. As acting General Manager Dienzo and the Board members from last year are aware, the engineering firm of GEI completed a detailed review and analysis of the 2020 UWMP in February 2022, and concluded and demonstrated that the moratorium on water connections imposed by the CCSD in 2001 is no longer appropriate. The report, delivered to the General Manager on March 8, 2022, utilized the CCSD's 2020 UWMP data to evaluate Cambria's water supply and demand situation. It concludes that immediately beginning

## the issuance of intent to serve letters to permit up to 184 Written additional water meter connections (or more) can be Public accomplished without compromising system reliability for Comment: existing users during multiple-year droughts and without relying on any water from the WRF. Tragically, this information was not considered in developing the current Strategic Plan. The Board owes it to the community to study, release, and discuss this GEI report, along with District staff's analysis of its conclusions and recommendations, so that the public can understand and appreciate the extent to which Cambria's water use conditions have changed for the better, and be confident that it is safe and appropriate to end the moratorium. The Board needs to communicate these findings to the County and Coastal Commission, and start the process of securing their support. Past planning was apparently driven by fear that the Coastal Commission would look unfavorably upon the WRF permit application process if the CCSD Board or Staff so much as "mentioned" new permits or ending the moratorium in CCSD's Strategic Plan. The CCSD Board has a duty to adopt a Strategic Plan that fully and openly considers all of the data that supports an end to the moratorium. The plan must include the actions, steps, milestones, and dates to achieve this goal to the benefit of the entire community. We are part of the Cambria Community and we are here to help. Thank you! Dennis A Dudzik, PE - Bradford Road Property Owner Written Resources & Infrastructure Committee Meeting Comment to be read at:: Written Board Meeting Comment to be read at:: Written Policy Committee Meeting Comment to be read at::

Powered by <u>Streamline</u>.

From: <u>Dennis Dudzik</u>

To: Karen Dean; Tom Gray; Harry Farmer; BoardComment; Ray Dienzo; Debra Scott; Michael Thomas

Subject: Written Public Comments to the January 19, 2023 CCSD Board Meeting: Agenda Items 8A and 8B - REGULAR

**BUSINESS** 

**Date:** Saturday, January 21, 2023 1:58:10 PM

Attachments: 2020 Urban Water Managment Plan - Review and Analysis - Final submitted.pdf

CCSD Strategic Plan Items 8A and 8B-1-19-2023.pdf

Importance: High

Directors, Acting General Manager Dienzo, and Board Secretary Reedall

Attached please find my complete letter to the Board on the subject Agenda Items 8A and 8B, along with the GEI report from last year (which I refer to in the letter). New Directors Debra Scott and Michael Thomas, as well as Acting General Manager Ray Dienzo, may not have already seen the GEI report, since it was provided to the previous Board members and GM early last year.

I likely will be unavailable for the meeting tomorrow to speak in person, so I am sending these to you to be sure that you all have the letter and supporting GEI report in advance of the meeting.

I do plan to participate in the planned 1/30/2023 – Special Board Meeting to provide additional comment on the Strategic Plan.

Please feel free to call or email me if you have questions or if I might otherwise be of service.

--

Thank you,

Dennis

Dennis A. Dudzik, P.E.

John F. Weigold, IV, General Manager

Cambria Community Services District 1316 Tamsen Street, Suite 201 Cambria, CA 93428

Dear GM Weigold:

United Lot Owners of Cambria (UnLOC) are submitting herewith for your review the following report, which was commissioned by UnLOC:

2020 Urban Water Management Plan – Review and Analysis, by GEI Consultants, dated Feb 25, 2022

This report assumes that all data and forecasts contained in the 2020 UWMP are correct. It analyzes the UWMP for the purpose of determining whether there is any justification for continuing the moratorium on new water connections. The conclusions in the report make it clear that CCSD has the capacity to lift the moratorium now. We call for it to do so for the following reasons:

- 1. The District has sufficient reliable supply now, without the WRF, to serve at least an additional 184 residential connections without impacting existing customers or the environment.
- 2. The District needs the funds that will be generated by its connection fees.
- 3. The District has a legal obligation to remove the emergency declaration when there is no longer an emergency, and that is the case now.
- 4. California is in the midst of a severe housing supply crisis. The State of California now requires local municipalities to immediately address impediments to infill development at all income levels. The water wait list lots meet the exact California Government Code definition of infill development, and building on them represents the most environmentally responsible way to increase the housing supply in California.
- 5. It's the right thing to do.

We look forward to seeing the District take immediate, positive action in response to this report. We will make our leadership and the author of the report available to meet and discuss our report at your convenience.

Sincerely,

Deryl Robinson President, UnLOC



February 25, 2022

Consulting Engineers and Scientists John F. Weigold, IV, General Manager Cambria Community Services District 1316 Tamsen Street, Suite 201 Cambria, CA 93428

Subject: 2020 Urban Water Management Plan – Review and Analysis

Dear John:

I'm writing this letter to transmit to you the enclosed report - 2020 Urban Water Management Plan – Review and Analysis. This document, prepared on behalf of the United Lot Owners of Cambria, evaluates how information presented in CCSD's 2020 Urban Water Management Plan and other public sources demonstrates the degree to which water conservation initiatives in Cambria have reduced reported and projected water use. The report concludes that these reductions in use should be considered in reviewing applications for water meter connections now pending before the CCSD.

Very truly yours,

David Miller, Ph.D. Principal Consultant

David w miller

Enclosure:



# 2020 Urban Water Management Plan – Review and Analysis

**Prepared for the United Lot Owners of Cambria** 

David w miller	2/25/2022
David Miller Ph.D.	Date

# 2020 Urban Water Management Plan – Review and Analysis

## **Executive Summary**

The United Lot Owners of Cambria (UnLOC) represents owners of approximately 1,015 undeveloped lots within the service area of the Cambria Community Services District (CCSD, district), a public agency serving 4,028 customer accounts. Within the CCSD's service area there are approximately 670 undeveloped lots with a total of 665 water meter applications having been submitted to CCSD. All of these applications were submitted before the end of 1990 when the district stopped accepting applications. Since that time, approximately 350 subsequent building permit allocation applications have been submitted and are now pending before San Luis Obispo County (County).

This report, which was prepared at the request of UnLOC, builds on work performed by GEI in 2017. The report uses sources including the CCSD's 2015 and 2020 Urban Water Management Plans (UWMPs) to assess whether the CCSD's reasoning for not approving water meter applications remains appropriate given the trends in domestic water use evident in the two UWMPs, trends reinforced by rates of residential water use submitted by the CCSD to the State Water Resources Control Board in 2021.

The report finds that the CCSD's 2015 and 2020 UWMPs were based on reasonable assumptions and projections of water supplies, demands and population growth available at the time each plan was prepared. While water supply and water use projections presented in the plans differ, these differences are representative of state-wide trends that reflect the impact of the urban water conservation initiatives that have been taken by local agencies including the CCSD and by the State of California.

It is apparent that, as with many other municipalities in California, Cambria is adapting to new realities with respect to residential and commercial water use by making water conservation a way of life. While these realities reduce household water use, they also expand the number of households a water purveyor can reliably serve.

The analyses presented in this report indicate that today, based upon projections in the 2020 UWMP, there is a basis for permitting 184 additional water meter connections without compromising system reliability for existing users during multiple-year droughts. This estimated number of connections does not reflect the reduction in 2021 residential water use rates reported to the State Board nor does it rely on anticipated operation of the Water Reclamation Facility, implementation of anticipated new state-wide indoor urban water use standards or the introduction of local or state-wide restrictions on water use for residential landscaping.

### Introduction

This document has been prepared for the United Lot Owners of Cambria (UnLOC) as a review and comparison of the 2015 and the Final 2020 Cambria Community Services District (CCSD) Urban Water Management Plans (UWMP) adopted by CCSD in June of 2021. The 2020 UWMP was prepared for the CCSD by Water Systems Consulting, Inc. (WSC)<sup>1</sup>.

The United Lot Owners of Cambria (UnLOC) is not an organization championing a single development. UnLOC represents owners of approximately 1,015 undeveloped lots within the service area of the Cambria Community Services District (CCSD), a public agency serving approximately 4,028 customer accounts. All lots owned by UnLOC members are infill lots within CCSD's existing boundary that are connected with water mains and laterals. UnLOC members desire to develop these properties and have filed for water meter applications from the CCSD that are needed for development of properties as an intent-to-serve notice from the CCSD is a prerequisite for issuance of building permits by San Luis Obispo County (County).

Lots owned by UnLOC members were subdivided around the turn of the last century and are all individually owned. Therefore, each individual home would be a single owner-developed project, connected to existing utility infrastructure. The following bullets describe potential characteristics of the proposed units to be developed:

- There are approximately 670 undeveloped lots with 665 water meter applications submitted to CCSD. Because the CCSD has not taken water meter wait list applications since the end of 1990, there are, in addition, approximately 350 subsequent building permit allocation applications now pending before the County.
- The lots are to be developed into detached single-family homes with a floor area averaging about 1,800 square feet.
- The individual lots vary in size, with many having been merged over the years, and average about 4,000 square feet bringing the total area for the 670 undeveloped lots to approximately 62 acres.
- Local regulations will likely require xeriscape, so outdoor irrigation on the lots to be developed is assumed to be minimal (volume of water applied approximately 24 percent of an irrigated lawn)<sup>2</sup>.
- The 2020 UWMP relies on 2010 census data to project an average household size of 2.03 persons per home after factoring in the proportion of vacant homes. The 2020 UWMP also relies on a residential water use rate of about 52 gallons per capita per day (r-gpcd) and a

<sup>&</sup>lt;sup>1</sup> Cambria Community Services District, Final 2020 Urban Water Management Plan, prepared by Water Systems Consulting, Inc., June 2021.

<sup>&</sup>lt;sup>2</sup> Southern Nevada Water Authority, Final Report Xeriscape Conversion Study, prepared by Southern Nevada Water Authority, 2005.

total water use rate of about 80 gpcd. Using these estimates, 670 units would have a total water usage of approximately 120 AFY.

The waiting list for new water and sewer hookups was established by CCSD in 1986, and, as noted above, the list was closed to new applications on December 31, 1990. At that time, the County's Growth Management Ordinance limited all new county-wide growth to 2.3 percent annually. Due to concerns about Cambria's water availability, the County reduced Cambria's growth limit to 1 percent in 2000. The current growth rate set by the County for Cambria is 0 percent. This limit is reassessed annually by the County Board of Supervisors.

CCSD has had a water connection moratorium in place continuously since November 2001 due to concerns over the long-term reliability of its water supply and a need to increase storage for fire suppression. To address these concerns, a programmatic EIR was certified in 2008 that included improvements to the potable distribution system, water conservation and reclamation programs, and seawater desalination

This report builds on previous work performed by GEI in 2017 that reviewed the adequacy of the 2010 and 2015 UWMPs, the latter prepared by Maddaus Water Management, Inc.<sup>3</sup>. The earlier report reviewed the methodologies applied in the two UWMPs and provided an opinion as to whether information presented in these plans was based on reasonable assumptions and projections of water supplies, demands and population growth. The previous study also discussed whether the 2015 UWMP would support actions by the CCSD, which would allow development of properties owned by UnLOC members.

# **Sources of Water Supply**

#### **Groundwater**

CCSD relies on groundwater from two local coastal stream valleys, the Santa Rosa and San Simeon basins, and reports its total water supplies from these two basins as including 1,230 acre-feet (AF) under California Coastal Commission Coastal Development Permit 428-10. Should CCSD complete licensing of its existing SWRCB diversion permits, the allowable diversions would be limited to 217.92 acre-feet per year (AFY) from the CCSD's San Rosa Creek wells and 798.82 AFY from the district's San Simeon Creek wells. Based on these values, both the 2015 and 2020 UWMPs present a "Total Right or Safe Yield" water supply of 1,017 AFY in each plan's five-year projections extending from 2020 through 2040 in the 2015 plan and from 2025 through 2045 in the 2020 plan.

<sup>&</sup>lt;sup>3</sup> Cambria Community Services District, Draft Urban Water Management Plan, prepared by Maddaus Water Management Inc., November 2016.

#### **Recycled Water**

Groundwater supplies are supplemented by recycled water. All wastewater is collected and used as a seawater intrusion barrier, for indirect potable reuse via the CCSD's Water Reclamation Facility (WRF), described below, or for landscape irrigation. The 2015 plan anticipates that 50 AFY of secondary-treated recycled water will become available for landscape irrigation in 2025 and that the volume of secondary-treated water used for this purpose will ramp up at an incremental rate of 10 AF each year until doubling to 100 AFY in 2030, a level maintained in future years. The 2020 plan presents the same values, but initiation of this program is deferred until 2030 and incremented until 2035. Use of recycled water to substitute for potable water now applied for landscape irrigation will enable the CCSD to augment its potable supply without increasing aquifer diversions.

The 2015 UWMP reports recharge of wastewater to maintain a seawater intrusion barrier as the largest use of recycled water. By contrast, the 2020 UWMP does not quantify recharge of wastewater, because this use, while important to protect the water quality of local aquifers, does not directly contribute to the water supply available to meet user demands.

Additional recycled water is available through CCSD's Water Reclamation Facility (WRF). Completed in 2014 in response to a drought emergency, the project was originally known as the Emergency Water Supply (EWS) project and was renamed the Sustainable Water Facility (SWF) when the Temporary Emergency Coastal Development Permit (CDP) was issued. The project continues to be operable subject to the conditions of this permit. The project is now known as the Water Reclamation Facility (WRF), the name used throughout the 2020 UWMP and adopted for use in this review.

The WRF uses a mix of percolated wastewater treatment plant effluent, diluted seawater from a deep saltwater wedge and creek underflow for its source water. Following tertiary treatment, WRF water is re-injected into the San Simeon Creek aquifer near the CCSD's San Simeon Well Field. The Temporary Emergency CDP, under which the WRF continues to operate, prohibits water produced by the project from being used to justify granting new service connections. The CCSD is currently in the process of responding to an Information Hold for the Regular CDP application, which was submitted in 2014 and subsequently revised due to project modifications.

Unlike the recycled water used to impede seawater intrusion, water re-injected by the WRF contributes to potable water supplies. Re-injected water travels at least 60 days underground before it can be recovered by the San Simeon wells. Based on hydrogeological modeling, approximately 60 percent of the re-injected water enters the CCSD wells, with the remaining 40 percent contributing either underflow to the subterranean creek channel or subterranean recycled flow back to the extraction wells. Under normal year conditions, both the 2015 and 2020 UWMPs predict that the WRF will contribute 21 AFY to the CCSD's potable water supply.

## **Comparison of Supply Projections**

**Table 1** summarizes projections for groundwater and recycled water supplies available to meet user demands presented in the 2015 and 2020 UWMPs. **Table 6-9 Water Supplies – Projected** in the 2015 plan does not include production from the WRF as a separate item, however, because WRF water is recovered from the San Simeon Creek wellfield, this water is included in the projected values for groundwater extraction shown in **Table 1**. However, **Table 6-9** of the 2015 plan does include an item for recycled water recharged to create a seawater instruction barrier. This entry is not included in the 2020 plan and is not shown in **Table 1** as this water is not available to meet user demands.

Table 1. Projected Water Supplies (AFY)

Projected Water Supplies	2025	2030	2035	2040
2015 UWMP				
Groundwater	757	770	791	789
Recycled Water – secondary treatment	50	100	100	100
Total	807	870	891	889
2020 UWMP				
Groundwater	725	725	725	725
Recycled water - secondary treatment	0	50	100	100
Recycled water (WRF) - tertiary treatment <sup>1</sup>	21	21	21	21
Total	746	796	846	846
Difference in Groundwater Extraction (2020 – 2015)	(32)	(45)	(66)	(64)
% Difference in Groundwater Extraction	-4.2%	-5.8%	-8.3%	-8.1%
Difference in Total Supply (2020 – 2015)	(61)	(74)	(45)	(43)
% Difference % (Total difference/2015 supply)	-7.6%	-8.5%	-5.1%	-4.8%

<sup>&</sup>lt;sup>1</sup> The assumed value of WRF production is based on 8 hours per day of operation for 12 weeks, generating approximately 35 AFY of recharged water with a net amount of 21 AF of potable water entering the CCSD wells. In a severe, multiple-year drought, the facility is assumed to have a maximum output of 1.8 AF per day based on a 24-hour per day operation for an average dry season duration of 184 days. This mode of operation would result in a net supply of 195 AF to the CCSD San Simeon Creek production wells.

As is evident in **Table 1**, the 2020 projections of groundwater production are from 4.2 to 8.3 percent lower than those projected in the 2015 plan while the total supplies projected in the 2020 plan are from 4.8 percent to 8.5 percent below those projected in the earlier plan.

## **Comparison of Use Projections**

**Table 1** illustrates the extent to which water supplies projected in the 2020 UWMP are below those projected in the 2015 plan. **Table 2** summarizes how these reductions in supply are more than offset by reductions in use that range from 20.3 to 27.6 percent below those of the 2015 plan. The reductions in the 2020 plan's projections of water use occur in spite of an anticipated increase in the rate of system losses.

Table 2. Projected Water Uses (AFY)

Projected Water Use	2020 <sup>1</sup>	2025	2030	2035	2040
2015 UWMP					
Single family – not vacation rental	440	420	445	455	453
Multi-family	23	22	23	23	23
Commercial	167	174	182	190	192
Other	26	26	26	26	26
Single family – vacation rental	35	35	35	35	35
System losses	56	58	59	62	61
Total Use	747	757	770	791	790
System Loss %	8.1%	8.3%	8.3%	8.5%	8.4%
2020 UWMP					
Single family – includes vacation rental	340	350	350	360	370
Multi-family	18	20	20	20	10
Commercial	114	140	150	150	160
Other	8	10	10	10	10
System losses	61	60	60	70	70
Total	541	580	590	610	630
System Loss %	12.7%	11.5%	11.3%	13.0%	12.5%
Use difference (2020 – 2015)	(206)	(177)	(180)	(181)	(160)
% Difference (Use difference/ 2015 Use)	27.6%	23.4%	23.4%	22.9%	20.3%

<sup>&</sup>lt;sup>1</sup> Water use reported in the 2020 UWMP is an observed value.

As shown in **Table 3**, projections presented in the 2020 UWMP show differences between supplies and uses that are greater than those projected in the 2015 UWMP. This illustrates both a net increase in the volume of supply above that needed to satisfy uses under normal conditions and an increase in the ratio of projected supplies versus uses.

As noted above, the conditions of the Temporary Emergency CDP prohibit water generated by the WRF from being used as a basis for permitting new connections. The bottom rows of **Table 3** account for this restriction and indicate that removal of WRF water from 2020 UWMP's projections of normal year supplies still yields ratios of supply versus use that exceed those presented in the 2015 plan.

Table 3. Projected Supply, Projected Use and Difference Between Supply and Use (AF)

Supply, Use, Difference	2025	2030	2035	2040
2015 UWMP				
Supply	807	870	891	889
Use	757	770	791	790
Difference	50	100	100	99
Supply/Use	107%	113%	113%	113%
2020 UWMP				
Supply	746	796	846	846
Use	580	590	610	630
Difference	166	206	236	216
Supply/Use	129%	135%	139%	134%
Supply - WRF contribution (21 AF)	725	775	825	825
Use	580	590	610	630
Difference	145	185	215	195
(Supply – WRF)/ Use	125%	131%	135%	131%

**Table 4** is based on the water supply and use values presented in **Table 3** for the 2020 UWMP. In this table the water supply is reduced to 95 percent and 85 percent of the net normal year supplies (projected normal year supplies minus WRF contribution) to account for supply reductions introduced under single-year and multiple-year drought conditions.

As seen in this table, the differences between supply and use under the single-year drought condition are greater than those projected for normal conditions in the 2015 plan. For the 85 percent supply scenario, while the absolute differences between use and supply are lower than in the 2015 projections, the ratio of supply versus use are comparable due to the reduced uses projected in the 2020 plan. The differences between supply and use presented in **Table 4** are conservative because no reductions in use have been introduced.

Table 4. 95% and 85% Supply, Use and Difference – 2020 UWMP (AF)

Supply, Use, Difference	2025	2030	2035	2040
2020 UWMP				
95% Net Supply <sup>1</sup>	689	736	784	784
Use	580	590	610	630
Difference (95% Net Supply – Use)	109	146	174	154
Ratio (95% Net Supply/ Use)	119%	125%	128%	124%
85% Net Supply <sup>1</sup>	616	659	701	701
Use	580	590	610	630
Difference (85% Net Supply – Use)	36	69	91	71
Ratio (85% Net Supply/Use)	106%	112%	115%	111%

<sup>&</sup>lt;sup>1</sup> Net Supply defined as projected 2020 UWMP supply – 21 AF WRF contribution

**Table 5** illustrates the degree to which the reductions in projected uses between the 2020 and 2015 UWMPs surpass the corresponding reductions in supply. The greater reduction in use results in the greater volumes of surplus normal year supply presented in the 2020 plan.

**Table 5. Net Difference (Supply - Use)** 

Net Difference	2025	2030	2035	2040
Total Supply Difference (2020 -2015)	(61)	(74)	(45)	(43)
Total Use Difference (2020 - 2015)	(177)	(180)	(181)	(160)
Net increase in available supply (Supply – Use)	116	106	136	117

# **Comparison of Population Growth Projections**

Population projections are among the factors that affect projected water use. **Table 6** Illustrates the population projections presented in the 2015 and 2020 UWMPs. The 2020 population estimated in the 2020 UWMP is smaller than that projected in the 2015 plan and the gap between the projected populations expands through 2035.

Due to the building moratorium, there has been no population growth between 2010 and 2020. In addition, all population projections are subject to considerable uncertainty as the timing of future growth in the CCSD service area is governed by factors not under the control of the district including economic conditions, permitting and approval of future projects by various agencies.

For the purposes of future water planning, the 2020 UWMP assumes that new service connections will not be allowed until 2026. After 2026, the plan assumes a population growth rate of approximately 1 percent per year for single family residences until a goal of 4,650 units is reached.

Table 6. Projected Population (2015 and 2020 UWMPs)

Projected Population	2020	2025	2030	2035	2040
2015 UWMP	6,535	6,755	7,157	7,558	7,719
2020 UWMP	6,032	6,000	6,300	6,500	6,800
Difference (2020 - 2015)	(503)	(755)	(857)	(1,058)	(919)
% Difference (Difference/ 2015 population)	(7.7%)	(11.2%)	(12.0%)	(14.0%)	(11.9%)

# **Comparison of Per Capita Water Demand Projections**

In addition to reduced projections of population growth, a second factor influencing the differences in projected water use between the 2015 and 2020 UWMPs are predicted changes in per capita water use. The 2015 plan projected CCSD's 2020 total per capita water use target

to be 105 gallons per capita per day (gpcd) while the actual consumption in 2020 was 79.8 gpcd<sup>4</sup>.

**Table 7** presents residential use rates (r-gpcd) from Cambria together with values reported by other municipalities on the Central Coast **Table 7**. Values shown in this table are for residential water use reported to the State Board for 2020 and 2021.

Table 7. Reported Residential Water Use (r-gpcd)

		Residential Water Use (r-gpcd)					
Municipality	Cambria	Monterey	Paso Robles	San Luis Obispo	Santa Barbara		
2020	52.4	58.5	90.2	54.1	60.6		
2021	48.7	60.2	97.0	59.2	68.3		

Source:

https://www.waterboards.ca.gov/water\_issues/programs/conservation\_portal/conservation\_reporting.html

Of the municipalities shown in **Table 7**, Cambria has the lowest residential water use rates for both 2020 and 2021, while San Luis Obispo has the second lowest rates.

The CCSD is continuously implementing demand management measures to meet its SBX7-7 water use targets and to prepare for future State-mandated water use efficiency standards. The projected per capita use rates presented in **Table 8** incorporate these considerations for both residential water use (r-gpcd) and total water use (gpcd).

Table 8. Observed and Projected Per Capita Water Use (gpcd)

Projected Per Capita Use	2020	2025	2030	2035	2040
2015 UWMP					
Residential Use (r-gpcd)	68.5	61.3	58.4	56.5	55.1
Total Use (gpcd)	110.6	100.0	96.0	93.4	91.4
2020 UWMP					
Residential Use (r-gpcd)	52.40	55.1	52.2	51.2	50.5
Total Use (gpcd)	79.8	86.2	83.5	82.6	81.4
Difference: r-gpcd (2020 – 2015)	(15.5)	(6.3)	(6.0)	(4.3)	(3.9)
% Difference: r-gpcd (Difference/2015)	(22.7%)	(10.2%)	(10.2%)	(7.6%)	(7.0%)
Difference – gpcd (2020 – 2015)	(30.6)	(13.8)	(12.5)	(9.7)	(8.7)
% Difference: gpcd (Difference/2015)	(27.6%)	(13.8%)	(13.0%)	(10.4%)	(9.6%)

The information in **Tables 6 and 8** illustrates how reductions in both the projected rate of population growth and in the projected rates of per capita use contribute to the reductions in projected total water use presented in **Table 2.** 

<sup>&</sup>lt;sup>4</sup> CCSD 2020 Urban Water Management Plan, June 2021, p ES-4.

#### **Conclusions and Recommendations**

The preceding comparison of supply and use projections in the CCSD's 2015 and 2020 UWMPs illustrates that the 2020 plan's projections for normal years and for drought conditions are more favorable for allowing the CCSD to consider permitting additional connections than are those of the 2015 plan. This is largely because the rebound in water use anticipated in the 2015 plan has not taken place. Rather, estimated per capita consumption has declined and is expected to continue to gradually decline. This observation is reinforced by Cambria's 2021 per capita residential water use rate reported to the State Board that is more than 7% below the reported 2020 rate presented above in **Table 7**. Therefore, all indications are that while California's on-going drought is causing water purveyors to avoid steps what would increase water use, the long-term trends in per capita demand favor reconsideration of permitting restrictions. In the case of Cambria, these trends in per capita water use are reinforced by a low rate of population growth.

There are fundamental drivers for this change in outlook. First among these is the state-wide recognition that improved water use efficiency is the most cost-effective source of "new" water supply critical for building long-term water resilience. An expression of this understanding is 2018 legislation aimed at "Making Water Conservation a California Way of Life." This legislation, which includes Assembly Bill 1668, institutionalizes future improvements in water use efficiency by mandating ongoing reductions in per capita use.

### **Evaluation of current conditions based on existing data**

The per capita water use projections presented in the 2015 and 2020 UWMPs and the residential water use rates reported to the State Board for 2021 demonstrate that water conservation initiatives at the state and local level have already reduced projected and reported water use in Cambria. These reductions are based on CCSD's efforts to lower per capita usage across its service area which would lessen the burden placed on supplies by current users and also diminish the volume of water required to serve newly permitted users.

Although the temporary emergency CDP now in place requires that water produced by the WRF not be used to justify new meter connections, **Tables 3 and 4** show this constraint does not provide a rationale sufficient to prohibit new connections. As illustrated in **Table 3**, under normal year conditions, the projected water supplies available to CCSD exceed projected uses even with the exclusion of WRF water. Moreover, **Table 4** illustrates that during single-year or multiple-year droughts, when water supplies are reduced to 95 or 85 percent of normal-year levels, respectively, supplies remain adequate to justify some relaxation of the moratorium on new meter connections even without consideration of the demand reductions likely to be introduced during droughts.

<sup>&</sup>lt;sup>5</sup> Making Water Conservation a California Way of Life: Implementing Executive Order B-37-16, Public Review Draft November 2016

For example, as shown in **Table 4**, without either operation of the WRF or reduction of demands, under multiple-year drought conditions in 2025 the CCSD is expected to have 36 AFY (32,140 gallons per day (gpd)) available above estimated demands. With an average of 2.03<sup>6</sup> residents per household and a total use rate of 86 gpcd, the quantity of available water is adequate to serve 184 new household connections. Moreover, in the event of a multiple-year drought that triggered a Stage 3 Water Emergency, WRF water can be utilized under the existing permit and would produce supply adequate to justify additional connections without jeopardizing service to existing connections.

In the 2020 UWMP the projected total use rate in 2025 of 86 gpcd is 1.56 times the residential use rate of 55 r-gpcd. Applying the same assumptions as above but using a 2025 per capita total use rate of 76 gpcd (1.56 times the residential rate of 49 r-gpcd reported to the State Board for 2021), 36 AFY would be adequate to serve 208 new household connections.

### **Evaluation of future conditions based on expected trends**

CCSD's capacity to serve new connections is likely to improve in the future. For example, the indoor water use standard to be submitted to the legislature in 2022 will be the first in a series of urban standards formulated in conformance with the 2018 legislation noted above. The residential indoor water use standard expected to be presented to the legislature would ramp residential use down to a 2025 target of 47 r-gpcd and to a target for 2030 and beyond of 42 r-gpcd<sup>7</sup>.

Introduction of the indoor standard will be followed by water use standards on residential landscapes, large commercial landscapes and system losses. Statewide or local standards to reduce water use by residential landscapes would further reduce residential water use. In particular, as referenced in footnote 1, the introduction of xeriscaping has dramatically reduced water consumption for landscaping from levels required by conventional lawns. In the instance of Cambria, the potential impacts of xeriscaping can be seen by the approximately 30 percent reduction in residential water usage between the peak summer month and the lowest water use month reported to the State Board in 2020 and 2021.

In 2025, it is reasonable to assume that the WRF will not be operational and that possible xeriscaping requirements for new residences will not be in force. However, by 2040 it is reasonable to assume that WRF water will be allowed to support new meter connections and that residential xeriscaping standards will have been established for new connections. Because the WRF would provide 21 AFY (18,746 gpd) under normal conditions but could be operated to deliver as much as 195 AFY (174,073 gpd) during multiple-year droughts, it is important to examine both cases.

<sup>&</sup>lt;sup>6</sup> 2010 U.S. Census data for single family household size used in 2020 UWMP

<sup>&</sup>lt;sup>7</sup> Pacific Institute at www.pacinst.org/water-efficiency-and-reuse

In 2040, under normal year conditions, **Table 3** shows that the volume of supply available above that needed to meet demands is projected to be 195 AFY plus 21 AFY contributed from operation of the WRF for a total of 216 AFY. This supply is sufficient to serve approximately 1,172 new household connections at a 2040 total per capita use rate of 81.4 gpcd derived from the 2020 UWMP and presented in **Table 8**. This service capacity is based on the residential use rate of 50.5 r-gpcd projected in the 2020 UWMP and shown in **Table 8**, a rate that is well in excess of the 42 r-gpcd target likely to be presented to the legislature for years 2030 and beyond. Therefore, the estimates presented in **Table 3** of water available above demand as well as the estimated demands that would be imposed by new connections are both likely to be conservative.

During multiple-year droughts, **Table 4** shows a projected volume of water available above normal year demands of 71 AFY, a supply adequate to serve approximately 380 additional household connections using the full 81.4 gpcd total per capita demand derived from values presented in the 2020 UWMP. However, as noted above, during multiple-year droughts, the WRF could be operated to provide as much as 195 AFY of supplemental water yielding a total supply above normal demand of 266 AFY (237,470 gpd). Under this condition, absent reductions in demand, about 52 AFY (27%) of the water supplied by the WRF would be needed to supplement the 71 AFY base supply to support the connection of each of the 665 lots that have pending applications for meter permits.

As noted above, by 2040 it is reasonable to assume that a residential rate of approximately 42 r-gpcd will have been attained based upon revisions to state-wide standards for indoor use. In addition, introduction of state or local standards for outdoor water use, such as a requirement for xeriscaping, would further lower residential demand creating a condition that has the potential to eliminate the need for reliance on the WRF to justify approval of the permit applications now before the CCSD.

#### Conclusion

It is apparent that, as with many other municipalities in California, Cambria is adapting to new realities with respect to residential and commercial water use by making water conservation a way of life. While these realities restrict the quantity of water individual households may consume, they also expand the number of households a water purveyor can reliably serve. Thus, the moratorium on water connections imposed by the CCSD in 2001 is a measure representative of a past era in water management which no longer reflects current and anticipated practices, attitudes, and regulations.

The analyses presented in this report indicate that today, based upon residential water use projections for 2025, there is a basis for permitting 184 additional water meter connections without compromising system reliability for existing users during multiple-year droughts. Based on water use rates reported by the CCSD to the State Board for 2021, rates already lower than

the projections used to support permitting of 184 additional connections, the number of meters that could be permitted under the same conditions rises to 208.

Further, residential standards expected to be introduced in the coming years are likely to make it possible for most of the water meter applications on the district's wait list to be approved without reliance on water provided by the WRF, a condition that will be strengthened when revised state or local standards for residential landscaping, such as a requirement for xeriscaping, are introduced. Finally, although water from the WRF is not needed to justify approval of existing permit applications, WRF water will be available in the future to bolster the CCSD's primary purpose of providing reliable water service to the residents of Cambria.

# Written Public Comments to the January 19, 2023 CCSD Board Meeting: Agenda Items 8A and 8B. - REGULAR BUSINESS

# Discussion and Consideration of Strategic Plan Ad Hoc Committee Report and Strategic Planning Process, Goals and Objectives

Dennis A Dudzik, PE, Cambria Community Member ("Homeless Property" Owner)

#### **Directors and Staff**

Let me begin by emphasizing that my wife and I are contributing and involved members of the Cambria Community. It just happens that we are "homeless property" owners, living in Eugene, and waiting to build our home on the Bradford Road property we have owned for over 20 years. As most of you know, I have been a frequent, supportive, and collaborative participant in CCSD Board meetings and Workshops for the 2021 and 2022 Strategic Planning efforts.

I appreciate the magnitude and sensitive nature of the ongoing WRF Coastal Development Permit Application process; that it requires compliance with CEQA, consistency with Local Coastal Program policies, is currently on Information Hold pending CCSD staff response, and is subject to Coastal Commission approval/appeal.

As acting General Manager Dienzo and the Board members from last year are aware, the engineering firm of GEI completed a detailed review and analysis of the 2020 UWMP in February 2022, and concluded and demonstrated that the moratorium on water connections imposed by the CCSD in 2001 is no longer appropriate. The report, delivered to the General Manager on March 8, 2022, utilized the CCSD's 2020 UWMP data to evaluate Cambria's water supply and demand situation. It concludes that immediately beginning the issuance of intent to serve letters to permit up to 184 additional water meter connections (or more) can be accomplished without compromising system reliability for existing users during multiple-year droughts and without relying on any water from the WRF.

Tragically, this information was not considered in developing the current Strategic Plan. The Board owes it to the community to study, release, and discuss this GEI report, along with District staff's analysis of its conclusions and recommendations, so that the public can understand and appreciate the extent to which Cambria's water use conditions have changed for the better, and be confident that it is safe and appropriate to end the moratorium. The Board needs to communicate these findings to the County and Coastal Commission, and start the process of securing their support.

Past planning was apparently driven by fear that the Coastal Commission would look unfavorably upon the WRF permit application process if the CCSD Board or Staff so much as "mentioned" new permits or ending the moratorium in CCSD's Strategic Plan.

The CCSD Board has a duty to adopt a Strategic Plan that fully and openly considers all of the data that supports an end to the moratorium. The plan must include the actions, steps, milestones, and dates to achieve this goal to the benefit of the entire community.

We are part of the Cambria Community and we are here to help. Thank you!

Dennis A Dudzik, PE - Bradford Road Property Owner

From: Dennis Dudzik

To: Karen Dean; Tom Gray; Harry Farmer; Debra Scott; Michael Thomas; BoardComment

Cc: Ray Dienzo

**Subject:** Fwd: Fwd: Board Meeting Input for the Strategic Plan Board Meeting 1-30-2023

**Date:** Monday, January 30, 2023 9:24:58 AM

Attachments: CCSD Strategic Plan Input-1-29-2023-DDudzik.pdf

CCSD Strategic Plan Items 8A and 8B-1-19-2023.pdf

2020 Urban Water Managment Plan - Review and Analysis - Final submitted.pdf

Importance: High

#### CCSD Board Members:

I apologize for the delay in sending this to you all directly. Thank you in advance for your review of the attached materials in support of the Strategic Plan workshop this afternoon, and for your efforts in this regard. I am looking forward to meeting with each of you this afternoon.

Dennis

Dennis A. Dudzik, PE

----- Forwarded Message ------

**Subject:**Fwd: Board Meeting Input for the Strategic Plan Board Meeting 1-30-2023

**Date:**Mon, 30 Jan 2023 09:08:11 -0800

From: Dennis Dudzik

**To:**Ray Dienzo <u><rdienzo@cambriacsd.org></u>

Good morning ray. Just checking that my computer and email are working this AM. I am forwarding the materials that I sent last night from my wife's email, along with the GEI report - just to be sure everyone has that material available today.

Looking forward to a productive discussion this afternoon.

Thanks much,

Dennis

Dennis A. Dudzik, PE

----- Forwarded Message ------

Subject: Board Meeting Input for the Strategic Plan Board Meeting 1-30-2023

Date: Mon, 30 Jan 2023 00:34:30 -0800

From:Pamela Dudzik

To:rdienzo

Ray

I am sending this to you from my wife's computer and email address, as I am currently unable to send emails to you from my computer. I will have my computer checked out, but in the meantime, this one will serve.

Would you please be so kind as to forward the two attachments to the Board Secretary and the Board members? These comment letters were prepared for the respective meetings (1-19-2023 and 1-30-2023).

Thank you,

Dennis

Dennis A. Dudzik, PE

# Community Input for Strategic Plan SPECIAL MEETING OF THE CAMBRIA COMMUNITY SERVICES DISTRICT BOARD OF DIRECTORS Monday, January 30, 2023, 1:00 PM Dennis A. Dudzik, PE

#### **Introduction**

This Community Input for the Special Meeting of the Cambria Community Services District (CCSD or District) Board of Directors (Directors or Board) provides some of the key reasons (with supporting documentation) why it is in the best interest of the community of Cambria that the Board make specific, significant, and fact-based additions to the current Strategic Plan, to plan for and achieve <u>Safe</u>, <u>Balanced</u>, <u>and Limited Growth</u>. Along with this growth will come environmental benefits and improved financial stability and support for the current and future residents of Cambria.

#### **Executive Summary**

This analysis assumes that all data and forecasts contained in the CCSD's 2020 Urban Water Management Plan (UWMP) are correct. It incorporates subsequent analyzes of the UWMP for the purpose of determining whether there is justification for continuing the moratorium on new water connections. The data and analyses make it clear that CCSD has the capacity to lift the moratorium now, and the Board ought to do so for the following reasons:

- 1. The District has sufficient reliable supply now, without the WRF, to serve at least an additional 184 residential connections without adversely impacting existing customers or the environment.
- 2. California is in the midst of a severe housing supply crisis. The State of California now requires local municipalities to immediately address impediments to infill development at all income levels. The water wait list lots meet the exact California Government Code definition of infill development, and legislature has stated that building on them represents the most environmentally responsible way to increase the housing supply in California.
- 3. The District needs the significant funds that will be generated by its connection fees.
- 4. The District has a legal obligation to remove the emergency declaration that initially justified the moratorium when there is no longer an emergency, and that is the case now.
- 5. It is the right thing to do.

#### **Background**

The following are key facts that must be fully considered by CCSD Board and Staff as part of the development of the 2023 Update of the CCSD's Strategic Plan.

#### 1. Updated Water Use and Supply Data

For the purposes of future water planning, the CCSD's 2020 UWMP (adopted June 2021) assumes that new service connections will not be allowed until 2026. After 2026, the UWMP assumes a population

growth rate of approximately 1 percent per year for single family residences until a goal of 4,650 units is reached.

In addition, the 2020 UWMP utilized the following assumption:

"To be conservative, the demand totals below assume there would be no reduction in customer demands during the consecutive dry year scenario."

This assumption has already been proven to be very conservative, since historical demand was lower during consecutive dry years. However, even with this assumption, the CCSD's 2020 Urban Water Master Plan makes it clear that the 2001 state of emergency no longer exists, the water system will support growth to the full 4,650 units, and therefore the moratorium is no longer justified.

The engineering firm of GEI completed a detailed review and analysis of the 2020 UWMP in February 2022, copies of which have been provided to the Board and Staff. The GEI report concluded that the moratorium on water connections imposed by the CCSD in 2001 is a measure representative of a past era in water management which no longer reflects current and anticipated practices, attitudes, and regulations.

The GEI analyses further demonstrates that today, based upon the UWMP residential water use projections for 2025, there is a clear basis for immediately permitting 184 additional water meter connections without compromising system reliability for existing users during multiple-year droughts and without relying on any water from the WRF. In addition, based on the water use rates reported by the CCSD to the State Board for 2021, (rates considerably lower than the projections used to support permitting of 184 additional connections), the number of meters that could be permitted under the same conditions rises to 208.

Based on projected water supply and demands over the next 25 years [including all 665 CCSD wait list water meters], the CCSD has supply capabilities that would be sufficient to meet expected demands through 2045 under single-dry year and multiple-dry year conditions assuming the WRF is in operation. Additionally, the conservation measures described in the Water Shortage Contingency Plan, along with upcoming state mandates, rainwater capture, and greywater percolation on site will further enhance reliability by providing an additional reduction in future demands.

Cambria has experienced severe drought conditions, and the Emergency Water Facility (now referred to as the WRF) on San Simeon Creek has proven invaluable in not only preserving the water supply, but also supporting riparian habitat in the lower watershed. Regardless of the status of a permanent Coastal Development Permit for the WRF, it has been proven that the WRF can be quickly started if needed during a severe drought.

The CCSD's 2015 UWMP did not address the fact that the Santa Rosa Creek well had been remediated, but instead relied on inflated forecasts of future water demand to continue to justify the moratorium. CCSD's 2020 UWMP again ignored the Santa Rosa Creek well remediation, but nonetheless demonstrates that sufficient water supply already exists to reliably meet current demands plus 184 additional meters from the water wait list.

The current CCSD data and analyses fully support the conclusion that ending the moratorium and developing, adopting, and implementing a Safe and Balanced Growth Plan are immediate priorities.

#### 2. California and Cambria Housing Crises

California is in the midst of a severe housing supply crisis. To address this crisis, three new pieces of legislation were passed on September 16, 2021: SB-8, SB-9, and SB-10. This legislation sets new state requirements to immediately address impediments to infill development. The water wait list lots meet the exact California Government Code definition of infill development; building on them represents the most environmentally responsible way to increase the housing supply in California. To quote from SB 10:

"The Legislature finds and declares that provision of adequate housing, in light of the severe shortage of housing at all income levels in this state, is a matter of statewide concern and is not a municipal affair as that term is used in Section 5 of Article XI of the California Constitution."

As the local community is well aware, Cambria is experiencing a housing crisis on a local but equally severe scale. The lack of new housing, inflated home prices, and associated reduction in Cambria's population have lead to closed businesses, declining classroom enrollment, and reduced ability to provide community services.

As confirmed by the U.S Census Bureau and shown in Table 1 below, Cambria has (over the last 20 years) seen its population decline by 554, or a total population decline of 8.9%.

Table 1: Historical Cambria Population					
Census	Pop.	%±	#±		
<u>2000</u>	6,232	_	_		
<u>2010</u>	6,032	-3.2%	-200		
<u>2020</u>	5,678	-5.9%	-354		
Total 20-Yr Change		-8.9%	-554		
Source: U.S. Decennial Census					

#### 3. Benefits of Limited Growth

Ending the moratorium, with a program of Safe, Balanced, Limited Growth would reverse the trend of declining population and (in addition to the improvement in the vitality of the local economy and community due to increased local spending and local jobs) these new building permits would add millions of dollars per year to the income of the CCSD.

The WRF is costing the District on the order of one million dollars or more per year, which (absent an additional funding source) is placing a significant financial burden on the current Cambria ratepayers. The additional source of funding, to relieve this burden, is already built into the District's Fee Schedule. Once the Water Wait List is re-opened, the District will begin receiving Intent to Serve Letter Fees, Water

Capacity Fees, Sewer Capacity Fees, and the numerous related fees listed on the following Table 2, as adjusted for inflation and including additional funds for costs not included in the 2013 fee schedule update.

With adjustments for inflation, it is reasonable to estimate that the Fees from the 1% per year release of Intent to Serve Letters (as described in the District's 2020 UWMP) would increase District revenue by more than the needed million dollars annually in addition to covering all of the associated District costs. This cash infusion will enhance the health of the local ecology, protect and improve sensitive habitat, and eliminate fire risk, while preserving its natural resources.

The above projections are based on the table below, using Exhibit A to the Cambria Community Services District's Current Website's Posted Fee Schedule (Board Approved on 08/22/2013) and assume One (1) EDU and property inside Cambria Assessment District No. 2. Note that Fees are ~\$20,000 more than shown for each additional EDU plus an additional ~\$2,000 for units outside of Cambria Assessment District No. 2.

It is critical to keep in mind that the 2020 UWMP has been shown to support releasing more than four times this number, today. However, even if the Board voted to lift the moratorium today, the District would need to implement a detailed plan of action, and complete the process of securing County and Coastal Commission approvals to begin processing the wait list, collecting fees and issuing intent to serve letters.

At the moment, the District has no such plan in place, and the current Strategic Plan completely ignores the requirement to plan to end the moratorium. The process has to start here and now.

The District staff are working diligently to complete all of the work needed to secure the Coastal Development Permit (CDP) for the WRF. However, they are doing so without strategic direction from the Board to apply the findings of the UWMP and the GEI report, update the CCSD Fee schedule, assess the benefits, and quantify the range of outcomes of varying levels of Safe, Balanced, Limited Growth.

The staff requires Board's strategic direction to prepare to communicate to the County and California Coastal Commission the facts and extent to which the conditions have changed, and provide further analyses (as needed) to their staff to eliminate the concerns about Cambria's water availability which prompted the County reduced Cambria's growth limit to 1% in 2000, and then to 0%. The District can adopt a Strategic Plan that is based on current data that will encourage the County to reinstate the 2.3% 1990 Growth Management Ordinance limit (or even a higher limit considering the 184 units described above) to Cambria's growth.

Table 2: CCSD Current and Estimated 2023 Connection Fees \*

Type of Fee	Current Fee*		2023	Fee (2%/yr Esc.)
CUSTOMER SERVICE CHARGES				
Account Start	\$	38.50	\$	46.93
Other/Miscellaneous Services	\$	-	\$	-
GENERAL ADMINISTRATIVE CHARGES				
Photo Copying	\$	20.00	\$	24.38
Drawings and Maps	\$	20.00	\$	24.38
WATER METER ALLOCATIONS				
Intent to Serve Letter Deposit	\$	900.00	\$	1,097.09
UTILITY SERVICE AND WATER CONSERVATION				
Water Capacity Fee	\$	12,688.00	\$	15,466.60
Sewer Capacity Fee	\$	7,161.00	\$	8,729.22
Engineering Plan Check	\$	206.00	\$	251.11
New Construction Application Fee	\$	55.00	\$	67.04
New Construction Plan Review	\$	110.00	\$	134.09
Meter Test	\$	125.00	\$	152.37
Water Conservation Fixtures Inspection	\$	99.50	\$	121.29
Sewer Wye Inspection	\$	99.50	\$	121.29
Pre-Treatment Inspection Related to SSWP	\$	105.00	\$	127.99
FIRE DEPARTMENT				
Plan Check w/Inspection and Fire Letter	\$	350.00	\$	426.65
Fire Alarm Plan Check & Inspection	\$	350.00	\$	426.65
On-site Hydrant Inspection	\$	300.00	\$	365.70
Sprinkler System	\$	550.00	\$	670.45
TOTAL ESTIMATED FEE COSTS PER INTENT TO SERVE	\$	23,177.50	\$	28,253.24

<sup>\*</sup> Based on Exhibit A, Cambria Community Services District's Current Posted Fee Schedule (Board Approved on 08/22/2013) and assuming One (1) EDU inside Cambria Assessment District No. 2. Inflation is assumed at 2%/yr 2013-2023. District's associated direct costs are also paid by the applicant and are in addition to the above Fees.

#### 4. Lot Owners are Community Members

Lot owners have, for decades, paid (and continue to pay) taxes, water wait list fees, and other fees to fund significant infrastructure improvements that have only (to date) benefitted existing homeowners. When residents of Cambria were impacted by flooding in 2001, the San Luis Obispo County Flood Control and Water Conservation District conducted a Drainage and Flood Control study. One of that study's recommendations was that paving Bradford Road would eliminate flooding for some residents at the end of Bradford Road and Orville Place. To achieve this flood protection, all of the residents and lot owners along Bradford Road (including the author of this report) paid for the paving and berm. We were treated as members of the community to support the community. We responded as community members, and paid the \$5,000 share of our cost of road paving and berm.

The CCSD Moratorium was declared in 2001 as an emergency under Section 350 of the Water Code due to MTBE contamination of the Santa Rosa Creek well. This well has long since been remediated, but the CCSD board has not revisited the findings that supported the emergency declaration 22 years ago.

The CCSD, on its website, states that:

CHAPTER 3. Water Shortage Emergencies [350 - 359]

(Chapter 3 added by Stats. 1953, Ch. 140.) 350.

The governing body of a distributor of a public water supply, whether publicly or privately owned and including a mutual water company, may declare a water shortage emergency condition to prevail within the area served by such distributor whenever it finds and determines that the ordinary demands and requirements of water consumers cannot be satisfied without depleting the water supply of the distributor to the extent that there would be insufficient water for human consumption, sanitation, and fire protection."

The district has no longer any valid data or current analyses that support or justify the continuation of the water shortage emergency declared in 2001. As such, planning and implementing a <u>Safe</u>, <u>Balanced</u>, <u>and Limited Growth Plan</u> must be an integral part of the District's Strategic Plan.

#### 5. It is the right thing to do.

This Board is in a unique position to change the course of Cambria for the better. A Strategic Plan that is founded on the highest standards of integrity and courage will include goals, objectives, and a plan of action based on what is right and based on all of the latest and most pertinent available facts and analyses. Please give the Safe, Balanced, and Limited Growth Plan the attention required in your Strategic Plan.

Respectfully Submitted: Dennis A. Dudzik, PE, Owner Bradford Road Property, Cambria, California

# Written Public Comments to the January 19, 2023 CCSD Board Meeting: Agenda Items 8A and 8B. - REGULAR BUSINESS

# Discussion and Consideration of Strategic Plan Ad Hoc Committee Report and Strategic Planning Process, Goals and Objectives

Dennis A Dudzik, PE, Cambria Community Member ("Homeless Property" Owner)

#### **Directors and Staff**

Let me begin by emphasizing that my wife and I are contributing and involved members of the Cambria Community. It just happens that we are "homeless property" owners, living in Eugene, and waiting to build our home on the Bradford Road property we have owned for over 20 years. As most of you know, I have been a frequent, supportive, and collaborative participant in CCSD Board meetings and Workshops for the 2021 and 2022 Strategic Planning efforts.

I appreciate the magnitude and sensitive nature of the ongoing WRF Coastal Development Permit Application process; that it requires compliance with CEQA, consistency with Local Coastal Program policies, is currently on Information Hold pending CCSD staff response, and is subject to Coastal Commission approval/appeal.

As acting General Manager Dienzo and the Board members from last year are aware, the engineering firm of GEI completed a detailed review and analysis of the 2020 UWMP in February 2022, and concluded and demonstrated that the moratorium on water connections imposed by the CCSD in 2001 is no longer appropriate. The report, delivered to the General Manager on March 8, 2022, utilized the CCSD's 2020 UWMP data to evaluate Cambria's water supply and demand situation. It concludes that immediately beginning the issuance of intent to serve letters to permit up to 184 additional water meter connections (or more) can be accomplished without compromising system reliability for existing users during multiple-year droughts and without relying on any water from the WRF.

Tragically, this information was not considered in developing the current Strategic Plan. The Board owes it to the community to study, release, and discuss this GEI report, along with District staff's analysis of its conclusions and recommendations, so that the public can understand and appreciate the extent to which Cambria's water use conditions have changed for the better, and be confident that it is safe and appropriate to end the moratorium. The Board needs to communicate these findings to the County and Coastal Commission, and start the process of securing their support.

Past planning was apparently driven by fear that the Coastal Commission would look unfavorably upon the WRF permit application process if the CCSD Board or Staff so much as "mentioned" new permits or ending the moratorium in CCSD's Strategic Plan.

The CCSD Board has a duty to adopt a Strategic Plan that fully and openly considers all of the data that supports an end to the moratorium. The plan must include the actions, steps, milestones, and dates to achieve this goal to the benefit of the entire community.

We are part of the Cambria Community and we are here to help. Thank you!

Dennis A Dudzik, PE - Bradford Road Property Owner

John F. Weigold, IV, General Manager

Cambria Community Services District 1316 Tamsen Street, Suite 201 Cambria, CA 93428

Dear GM Weigold:

United Lot Owners of Cambria (UnLOC) are submitting herewith for your review the following report, which was commissioned by UnLOC:

2020 Urban Water Management Plan – Review and Analysis, by GEI Consultants, dated Feb 25, 2022

This report assumes that all data and forecasts contained in the 2020 UWMP are correct. It analyzes the UWMP for the purpose of determining whether there is any justification for continuing the moratorium on new water connections. The conclusions in the report make it clear that CCSD has the capacity to lift the moratorium now. We call for it to do so for the following reasons:

- 1. The District has sufficient reliable supply now, without the WRF, to serve at least an additional 184 residential connections without impacting existing customers or the environment.
- 2. The District needs the funds that will be generated by its connection fees.
- 3. The District has a legal obligation to remove the emergency declaration when there is no longer an emergency, and that is the case now.
- 4. California is in the midst of a severe housing supply crisis. The State of California now requires local municipalities to immediately address impediments to infill development at all income levels. The water wait list lots meet the exact California Government Code definition of infill development, and building on them represents the most environmentally responsible way to increase the housing supply in California.
- 5. It's the right thing to do.

We look forward to seeing the District take immediate, positive action in response to this report. We will make our leadership and the author of the report available to meet and discuss our report at your convenience.

Sincerely,

Deryl Robinson President, UnLOC



February 25, 2022

Consulting Engineers and Scientists John F. Weigold, IV, General Manager Cambria Community Services District 1316 Tamsen Street, Suite 201 Cambria, CA 93428

Subject: 2020 Urban Water Management Plan – Review and Analysis

Dear John:

I'm writing this letter to transmit to you the enclosed report - 2020 Urban Water Management Plan – Review and Analysis. This document, prepared on behalf of the United Lot Owners of Cambria, evaluates how information presented in CCSD's 2020 Urban Water Management Plan and other public sources demonstrates the degree to which water conservation initiatives in Cambria have reduced reported and projected water use. The report concludes that these reductions in use should be considered in reviewing applications for water meter connections now pending before the CCSD.

Very truly yours,

David Miller, Ph.D.

David w miller

Principal Consultant

Enclosure:



# 2020 Urban Water Management Plan – Review and Analysis

**Prepared for the United Lot Owners of Cambria** 

David w miller	2/25/2022
David Miller Ph.D.	Date

# 2020 Urban Water Management Plan – Review and Analysis

## **Executive Summary**

The United Lot Owners of Cambria (UnLOC) represents owners of approximately 1,015 undeveloped lots within the service area of the Cambria Community Services District (CCSD, district), a public agency serving 4,028 customer accounts. Within the CCSD's service area there are approximately 670 undeveloped lots with a total of 665 water meter applications having been submitted to CCSD. All of these applications were submitted before the end of 1990 when the district stopped accepting applications. Since that time, approximately 350 subsequent building permit allocation applications have been submitted and are now pending before San Luis Obispo County (County).

This report, which was prepared at the request of UnLOC, builds on work performed by GEI in 2017. The report uses sources including the CCSD's 2015 and 2020 Urban Water Management Plans (UWMPs) to assess whether the CCSD's reasoning for not approving water meter applications remains appropriate given the trends in domestic water use evident in the two UWMPs, trends reinforced by rates of residential water use submitted by the CCSD to the State Water Resources Control Board in 2021.

The report finds that the CCSD's 2015 and 2020 UWMPs were based on reasonable assumptions and projections of water supplies, demands and population growth available at the time each plan was prepared. While water supply and water use projections presented in the plans differ, these differences are representative of state-wide trends that reflect the impact of the urban water conservation initiatives that have been taken by local agencies including the CCSD and by the State of California.

It is apparent that, as with many other municipalities in California, Cambria is adapting to new realities with respect to residential and commercial water use by making water conservation a way of life. While these realities reduce household water use, they also expand the number of households a water purveyor can reliably serve.

The analyses presented in this report indicate that today, based upon projections in the 2020 UWMP, there is a basis for permitting 184 additional water meter connections without compromising system reliability for existing users during multiple-year droughts. This estimated number of connections does not reflect the reduction in 2021 residential water use rates reported to the State Board nor does it rely on anticipated operation of the Water Reclamation Facility, implementation of anticipated new state-wide indoor urban water use standards or the introduction of local or state-wide restrictions on water use for residential landscaping.

## Introduction

This document has been prepared for the United Lot Owners of Cambria (UnLOC) as a review and comparison of the 2015 and the Final 2020 Cambria Community Services District (CCSD) Urban Water Management Plans (UWMP) adopted by CCSD in June of 2021. The 2020 UWMP was prepared for the CCSD by Water Systems Consulting, Inc. (WSC)<sup>1</sup>.

The United Lot Owners of Cambria (UnLOC) is not an organization championing a single development. UnLOC represents owners of approximately 1,015 undeveloped lots within the service area of the Cambria Community Services District (CCSD), a public agency serving approximately 4,028 customer accounts. All lots owned by UnLOC members are infill lots within CCSD's existing boundary that are connected with water mains and laterals. UnLOC members desire to develop these properties and have filed for water meter applications from the CCSD that are needed for development of properties as an intent-to-serve notice from the CCSD is a prerequisite for issuance of building permits by San Luis Obispo County (County).

Lots owned by UnLOC members were subdivided around the turn of the last century and are all individually owned. Therefore, each individual home would be a single owner-developed project, connected to existing utility infrastructure. The following bullets describe potential characteristics of the proposed units to be developed:

- There are approximately 670 undeveloped lots with 665 water meter applications submitted to CCSD. Because the CCSD has not taken water meter wait list applications since the end of 1990, there are, in addition, approximately 350 subsequent building permit allocation applications now pending before the County.
- The lots are to be developed into detached single-family homes with a floor area averaging about 1,800 square feet.
- The individual lots vary in size, with many having been merged over the years, and average about 4,000 square feet bringing the total area for the 670 undeveloped lots to approximately 62 acres.
- Local regulations will likely require xeriscape, so outdoor irrigation on the lots to be developed is assumed to be minimal (volume of water applied approximately 24 percent of an irrigated lawn)<sup>2</sup>.
- The 2020 UWMP relies on 2010 census data to project an average household size of 2.03 persons per home after factoring in the proportion of vacant homes. The 2020 UWMP also relies on a residential water use rate of about 52 gallons per capita per day (r-gpcd) and a

<sup>&</sup>lt;sup>1</sup> Cambria Community Services District, Final 2020 Urban Water Management Plan, prepared by Water Systems Consulting, Inc., June 2021.

<sup>&</sup>lt;sup>2</sup> Southern Nevada Water Authority, Final Report Xeriscape Conversion Study, prepared by Southern Nevada Water Authority, 2005.

total water use rate of about 80 gpcd. Using these estimates, 670 units would have a total water usage of approximately 120 AFY.

The waiting list for new water and sewer hookups was established by CCSD in 1986, and, as noted above, the list was closed to new applications on December 31, 1990. At that time, the County's Growth Management Ordinance limited all new county-wide growth to 2.3 percent annually. Due to concerns about Cambria's water availability, the County reduced Cambria's growth limit to 1 percent in 2000. The current growth rate set by the County for Cambria is 0 percent. This limit is reassessed annually by the County Board of Supervisors.

CCSD has had a water connection moratorium in place continuously since November 2001 due to concerns over the long-term reliability of its water supply and a need to increase storage for fire suppression. To address these concerns, a programmatic EIR was certified in 2008 that included improvements to the potable distribution system, water conservation and reclamation programs, and seawater desalination

This report builds on previous work performed by GEI in 2017 that reviewed the adequacy of the 2010 and 2015 UWMPs, the latter prepared by Maddaus Water Management, Inc.<sup>3</sup>. The earlier report reviewed the methodologies applied in the two UWMPs and provided an opinion as to whether information presented in these plans was based on reasonable assumptions and projections of water supplies, demands and population growth. The previous study also discussed whether the 2015 UWMP would support actions by the CCSD, which would allow development of properties owned by UnLOC members.

# **Sources of Water Supply**

#### **Groundwater**

CCSD relies on groundwater from two local coastal stream valleys, the Santa Rosa and San Simeon basins, and reports its total water supplies from these two basins as including 1,230 acre-feet (AF) under California Coastal Commission Coastal Development Permit 428-10. Should CCSD complete licensing of its existing SWRCB diversion permits, the allowable diversions would be limited to 217.92 acre-feet per year (AFY) from the CCSD's San Rosa Creek wells and 798.82 AFY from the district's San Simeon Creek wells. Based on these values, both the 2015 and 2020 UWMPs present a "Total Right or Safe Yield" water supply of 1,017 AFY in each plan's five-year projections extending from 2020 through 2040 in the 2015 plan and from 2025 through 2045 in the 2020 plan.

<sup>&</sup>lt;sup>3</sup> Cambria Community Services District, Draft Urban Water Management Plan, prepared by Maddaus Water Management Inc., November 2016.

#### **Recycled Water**

Groundwater supplies are supplemented by recycled water. All wastewater is collected and used as a seawater intrusion barrier, for indirect potable reuse via the CCSD's Water Reclamation Facility (WRF), described below, or for landscape irrigation. The 2015 plan anticipates that 50 AFY of secondary-treated recycled water will become available for landscape irrigation in 2025 and that the volume of secondary-treated water used for this purpose will ramp up at an incremental rate of 10 AF each year until doubling to 100 AFY in 2030, a level maintained in future years. The 2020 plan presents the same values, but initiation of this program is deferred until 2030 and incremented until 2035. Use of recycled water to substitute for potable water now applied for landscape irrigation will enable the CCSD to augment its potable supply without increasing aquifer diversions.

The 2015 UWMP reports recharge of wastewater to maintain a seawater intrusion barrier as the largest use of recycled water. By contrast, the 2020 UWMP does not quantify recharge of wastewater, because this use, while important to protect the water quality of local aquifers, does not directly contribute to the water supply available to meet user demands.

Additional recycled water is available through CCSD's Water Reclamation Facility (WRF). Completed in 2014 in response to a drought emergency, the project was originally known as the Emergency Water Supply (EWS) project and was renamed the Sustainable Water Facility (SWF) when the Temporary Emergency Coastal Development Permit (CDP) was issued. The project continues to be operable subject to the conditions of this permit. The project is now known as the Water Reclamation Facility (WRF), the name used throughout the 2020 UWMP and adopted for use in this review.

The WRF uses a mix of percolated wastewater treatment plant effluent, diluted seawater from a deep saltwater wedge and creek underflow for its source water. Following tertiary treatment, WRF water is re-injected into the San Simeon Creek aquifer near the CCSD's San Simeon Well Field. The Temporary Emergency CDP, under which the WRF continues to operate, prohibits water produced by the project from being used to justify granting new service connections. The CCSD is currently in the process of responding to an Information Hold for the Regular CDP application, which was submitted in 2014 and subsequently revised due to project modifications.

Unlike the recycled water used to impede seawater intrusion, water re-injected by the WRF contributes to potable water supplies. Re-injected water travels at least 60 days underground before it can be recovered by the San Simeon wells. Based on hydrogeological modeling, approximately 60 percent of the re-injected water enters the CCSD wells, with the remaining 40 percent contributing either underflow to the subterranean creek channel or subterranean recycled flow back to the extraction wells. Under normal year conditions, both the 2015 and 2020 UWMPs predict that the WRF will contribute 21 AFY to the CCSD's potable water supply.

## **Comparison of Supply Projections**

**Table 1** summarizes projections for groundwater and recycled water supplies available to meet user demands presented in the 2015 and 2020 UWMPs. **Table 6-9 Water Supplies – Projected** in the 2015 plan does not include production from the WRF as a separate item, however, because WRF water is recovered from the San Simeon Creek wellfield, this water is included in the projected values for groundwater extraction shown in **Table 1**. However, **Table 6-9** of the 2015 plan does include an item for recycled water recharged to create a seawater instruction barrier. This entry is not included in the 2020 plan and is not shown in **Table 1** as this water is not available to meet user demands.

Table 1. Projected Water Supplies (AFY)

Projected Water Supplies	2025	2030	2035	2040
2015 UWMP				
Groundwater	757	770	791	789
Recycled Water – secondary treatment	50	100	100	100
Total	807	870	891	889
2020 UWMP				
Groundwater	725	725	725	725
Recycled water - secondary treatment	0	50	100	100
Recycled water (WRF) - tertiary treatment <sup>1</sup>	21	21	21	21
Total	746	796	846	846
Difference in Groundwater Extraction (2020 – 2015)	(32)	(45)	(66)	(64)
% Difference in Groundwater Extraction	-4.2%	-5.8%	-8.3%	-8.1%
Difference in Total Supply (2020 – 2015)	(61)	(74)	(45)	(43)
% Difference % (Total difference/2015 supply)	-7.6%	-8.5%	-5.1%	-4.8%

<sup>&</sup>lt;sup>1</sup> The assumed value of WRF production is based on 8 hours per day of operation for 12 weeks, generating approximately 35 AFY of recharged water with a net amount of 21 AF of potable water entering the CCSD wells. In a severe, multiple-year drought, the facility is assumed to have a maximum output of 1.8 AF per day based on a 24-hour per day operation for an average dry season duration of 184 days. This mode of operation would result in a net supply of 195 AF to the CCSD San Simeon Creek production wells.

As is evident in **Table 1**, the 2020 projections of groundwater production are from 4.2 to 8.3 percent lower than those projected in the 2015 plan while the total supplies projected in the 2020 plan are from 4.8 percent to 8.5 percent below those projected in the earlier plan.

## **Comparison of Use Projections**

**Table 1** illustrates the extent to which water supplies projected in the 2020 UWMP are below those projected in the 2015 plan. **Table 2** summarizes how these reductions in supply are more than offset by reductions in use that range from 20.3 to 27.6 percent below those of the 2015 plan. The reductions in the 2020 plan's projections of water use occur in spite of an anticipated increase in the rate of system losses.

Table 2. Projected Water Uses (AFY)

Projected Water Use	2020 <sup>1</sup>	2025	2030	2035	2040
2015 UWMP					
Single family – not vacation rental	440	420	445	455	453
Multi-family	23	22	23	23	23
Commercial	167	174	182	190	192
Other	26	26	26	26	26
Single family – vacation rental	35	35	35	35	35
System losses	56	58	59	62	61
Total Use	747	757	770	791	790
System Loss %	8.1%	8.3%	8.3%	8.5%	8.4%
2020 UWMP					
Single family – includes vacation rental	340	350	350	360	370
Multi-family	18	20	20	20	10
Commercial	114	140	150	150	160
Other	8	10	10	10	10
System losses	61	60	60	70	70
Total	541	580	590	610	630
System Loss %	12.7%	11.5%	11.3%	13.0%	12.5%
Use difference (2020 – 2015)	(206)	(177)	(180)	(181)	(160)
% Difference (Use difference/ 2015 Use)	27.6%	23.4%	23.4%	22.9%	20.3%

<sup>&</sup>lt;sup>1</sup>Water use reported in the 2020 UWMP is an observed value.

As shown in **Table 3**, projections presented in the 2020 UWMP show differences between supplies and uses that are greater than those projected in the 2015 UWMP. This illustrates both a net increase in the volume of supply above that needed to satisfy uses under normal conditions and an increase in the ratio of projected supplies versus uses.

As noted above, the conditions of the Temporary Emergency CDP prohibit water generated by the WRF from being used as a basis for permitting new connections. The bottom rows of **Table 3** account for this restriction and indicate that removal of WRF water from 2020 UWMP's projections of normal year supplies still yields ratios of supply versus use that exceed those presented in the 2015 plan.

Table 3. Projected Supply, Projected Use and Difference Between Supply and Use (AF)

Supply, Use, Difference	2025	2030	2035	2040
2015 UWMP				
Supply	807	870	891	889
Use	757	770	791	790
Difference	50	100	100	99
Supply/Use	107%	113%	113%	113%
2020 UWMP				
Supply	746	796	846	846
Use	580	590	610	630
Difference	166	206	236	216
Supply/Use	129%	135%	139%	134%
Supply - WRF contribution (21 AF)	725	775	825	825
Use	580	590	610	630
Difference	145	185	215	195
(Supply – WRF)/ Use	125%	131%	135%	131%

**Table 4** is based on the water supply and use values presented in **Table 3** for the 2020 UWMP. In this table the water supply is reduced to 95 percent and 85 percent of the net normal year supplies (projected normal year supplies minus WRF contribution) to account for supply reductions introduced under single-year and multiple-year drought conditions.

As seen in this table, the differences between supply and use under the single-year drought condition are greater than those projected for normal conditions in the 2015 plan. For the 85 percent supply scenario, while the absolute differences between use and supply are lower than in the 2015 projections, the ratio of supply versus use are comparable due to the reduced uses projected in the 2020 plan. The differences between supply and use presented in **Table 4** are conservative because no reductions in use have been introduced.

Table 4. 95% and 85% Supply, Use and Difference – 2020 UWMP (AF)

Supply, Use, Difference	2025	2030	2035	2040
2020 UWMP				
95% Net Supply <sup>1</sup>	689	736	784	784
Use	580	590	610	630
Difference (95% Net Supply – Use)	109	146	174	154
Ratio (95% Net Supply/ Use)	119%	125%	128%	124%
85% Net Supply <sup>1</sup>	616	659	701	701
Use	580	590	610	630
Difference (85% Net Supply – Use)	36	69	91	71
Ratio (85% Net Supply/Use)	106%	112%	115%	111%

<sup>&</sup>lt;sup>1</sup> Net Supply defined as projected 2020 UWMP supply – 21 AF WRF contribution

**Table 5** illustrates the degree to which the reductions in projected uses between the 2020 and 2015 UWMPs surpass the corresponding reductions in supply. The greater reduction in use results in the greater volumes of surplus normal year supply presented in the 2020 plan.

**Table 5. Net Difference (Supply - Use)** 

Net Difference	2025	2030	2035	2040
Total Supply Difference (2020 -2015)	(61)	(74)	(45)	(43)
Total Use Difference (2020 - 2015)	(177)	(180)	(181)	(160)
Net increase in available supply (Supply – Use)	116	106	136	117

# **Comparison of Population Growth Projections**

Population projections are among the factors that affect projected water use. **Table 6** Illustrates the population projections presented in the 2015 and 2020 UWMPs. The 2020 population estimated in the 2020 UWMP is smaller than that projected in the 2015 plan and the gap between the projected populations expands through 2035.

Due to the building moratorium, there has been no population growth between 2010 and 2020. In addition, all population projections are subject to considerable uncertainty as the timing of future growth in the CCSD service area is governed by factors not under the control of the district including economic conditions, permitting and approval of future projects by various agencies.

For the purposes of future water planning, the 2020 UWMP assumes that new service connections will not be allowed until 2026. After 2026, the plan assumes a population growth rate of approximately 1 percent per year for single family residences until a goal of 4,650 units is reached.

Table 6. Projected Population (2015 and 2020 UWMPs)

Projected Population	2020	2025	2030	2035	2040
2015 UWMP	6,535	6,755	7,157	7,558	7,719
2020 UWMP	6,032	6,000	6,300	6,500	6,800
Difference (2020 - 2015)	(503)	(755)	(857)	(1,058)	(919)
% Difference (Difference/ 2015 population)	(7.7%)	(11.2%)	(12.0%)	(14.0%)	(11.9%)

# **Comparison of Per Capita Water Demand Projections**

In addition to reduced projections of population growth, a second factor influencing the differences in projected water use between the 2015 and 2020 UWMPs are predicted changes in per capita water use. The 2015 plan projected CCSD's 2020 total per capita water use target

to be 105 gallons per capita per day (gpcd) while the actual consumption in 2020 was 79.8 gpcd<sup>4</sup>.

**Table 7** presents residential use rates (r-gpcd) from Cambria together with values reported by other municipalities on the Central Coast **Table 7**. Values shown in this table are for residential water use reported to the State Board for 2020 and 2021.

Table 7. Reported Residential Water Use (r-gpcd)

	Residential Water Use (r-gpcd)					
Municipality	Cambria	Monterey	Paso Robles	San Luis Obispo	Santa Barbara	
2020	52.4	58.5	90.2	54.1	60.6	
2021	48.7	60.2	97.0	59.2	68.3	

Source:

https://www.waterboards.ca.gov/water\_issues/programs/conservation\_portal/conservation\_reporting.html

Of the municipalities shown in **Table 7**, Cambria has the lowest residential water use rates for both 2020 and 2021, while San Luis Obispo has the second lowest rates.

The CCSD is continuously implementing demand management measures to meet its SBX7-7 water use targets and to prepare for future State-mandated water use efficiency standards. The projected per capita use rates presented in **Table 8** incorporate these considerations for both residential water use (r-gpcd) and total water use (gpcd).

Table 8. Observed and Projected Per Capita Water Use (gpcd)

Projected Per Capita Use	2020	2025	2030	2035	2040
2015 UWMP					
Residential Use (r-gpcd)	68.5	61.3	58.4	56.5	55.1
Total Use (gpcd)	110.6	100.0	96.0	93.4	91.4
2020 UWMP					
Residential Use (r-gpcd)	52.40	55.1	52.2	51.2	50.5
Total Use (gpcd)	79.8	86.2	83.5	82.6	81.4
Difference: r-gpcd (2020 – 2015)	(15.5)	(6.3)	(6.0)	(4.3)	(3.9)
% Difference: r-gpcd (Difference/2015)	(22.7%)	(10.2%)	(10.2%)	(7.6%)	(7.0%)
Difference – gpcd (2020 – 2015)	(30.6)	(13.8)	(12.5)	(9.7)	(8.7)
% Difference: gpcd (Difference/2015)	(27.6%)	(13.8%)	(13.0%)	(10.4%)	(9.6%)

The information in **Tables 6 and 8** illustrates how reductions in both the projected rate of population growth and in the projected rates of per capita use contribute to the reductions in projected total water use presented in **Table 2.** 

<sup>&</sup>lt;sup>4</sup> CCSD 2020 Urban Water Management Plan, June 2021, p ES-4.

#### **Conclusions and Recommendations**

The preceding comparison of supply and use projections in the CCSD's 2015 and 2020 UWMPs illustrates that the 2020 plan's projections for normal years and for drought conditions are more favorable for allowing the CCSD to consider permitting additional connections than are those of the 2015 plan. This is largely because the rebound in water use anticipated in the 2015 plan has not taken place. Rather, estimated per capita consumption has declined and is expected to continue to gradually decline. This observation is reinforced by Cambria's 2021 per capita residential water use rate reported to the State Board that is more than 7% below the reported 2020 rate presented above in **Table 7**. Therefore, all indications are that while California's on-going drought is causing water purveyors to avoid steps what would increase water use, the long-term trends in per capita demand favor reconsideration of permitting restrictions. In the case of Cambria, these trends in per capita water use are reinforced by a low rate of population growth.

There are fundamental drivers for this change in outlook. First among these is the state-wide recognition that improved water use efficiency is the most cost-effective source of "new" water supply critical for building long-term water resilience. An expression of this understanding is 2018 legislation aimed at "Making Water Conservation a California Way of Life." This legislation, which includes Assembly Bill 1668, institutionalizes future improvements in water use efficiency by mandating ongoing reductions in per capita use.

## **Evaluation of current conditions based on existing data**

The per capita water use projections presented in the 2015 and 2020 UWMPs and the residential water use rates reported to the State Board for 2021 demonstrate that water conservation initiatives at the state and local level have already reduced projected and reported water use in Cambria. These reductions are based on CCSD's efforts to lower per capita usage across its service area which would lessen the burden placed on supplies by current users and also diminish the volume of water required to serve newly permitted users.

Although the temporary emergency CDP now in place requires that water produced by the WRF not be used to justify new meter connections, **Tables 3 and 4** show this constraint does not provide a rationale sufficient to prohibit new connections. As illustrated in **Table 3**, under normal year conditions, the projected water supplies available to CCSD exceed projected uses even with the exclusion of WRF water. Moreover, **Table 4** illustrates that during single-year or multiple-year droughts, when water supplies are reduced to 95 or 85 percent of normal-year levels, respectively, supplies remain adequate to justify some relaxation of the moratorium on new meter connections even without consideration of the demand reductions likely to be introduced during droughts.

<sup>&</sup>lt;sup>5</sup> Making Water Conservation a California Way of Life: Implementing Executive Order B-37-16, Public Review Draft November 2016

For example, as shown in **Table 4**, without either operation of the WRF or reduction of demands, under multiple-year drought conditions in 2025 the CCSD is expected to have 36 AFY (32,140 gallons per day (gpd)) available above estimated demands. With an average of 2.03<sup>6</sup> residents per household and a total use rate of 86 gpcd, the quantity of available water is adequate to serve 184 new household connections. Moreover, in the event of a multiple-year drought that triggered a Stage 3 Water Emergency, WRF water can be utilized under the existing permit and would produce supply adequate to justify additional connections without jeopardizing service to existing connections.

In the 2020 UWMP the projected total use rate in 2025 of 86 gpcd is 1.56 times the residential use rate of 55 r-gpcd. Applying the same assumptions as above but using a 2025 per capita total use rate of 76 gpcd (1.56 times the residential rate of 49 r-gpcd reported to the State Board for 2021), 36 AFY would be adequate to serve 208 new household connections.

## **Evaluation of future conditions based on expected trends**

CCSD's capacity to serve new connections is likely to improve in the future. For example, the indoor water use standard to be submitted to the legislature in 2022 will be the first in a series of urban standards formulated in conformance with the 2018 legislation noted above. The residential indoor water use standard expected to be presented to the legislature would ramp residential use down to a 2025 target of 47 r-gpcd and to a target for 2030 and beyond of 42 r-gpcd<sup>7</sup>.

Introduction of the indoor standard will be followed by water use standards on residential landscapes, large commercial landscapes and system losses. Statewide or local standards to reduce water use by residential landscapes would further reduce residential water use. In particular, as referenced in footnote 1, the introduction of xeriscaping has dramatically reduced water consumption for landscaping from levels required by conventional lawns. In the instance of Cambria, the potential impacts of xeriscaping can be seen by the approximately 30 percent reduction in residential water usage between the peak summer month and the lowest water use month reported to the State Board in 2020 and 2021.

In 2025, it is reasonable to assume that the WRF will not be operational and that possible xeriscaping requirements for new residences will not be in force. However, by 2040 it is reasonable to assume that WRF water will be allowed to support new meter connections and that residential xeriscaping standards will have been established for new connections. Because the WRF would provide 21 AFY (18,746 gpd) under normal conditions but could be operated to deliver as much as 195 AFY (174,073 gpd) during multiple-year droughts, it is important to examine both cases.

<sup>&</sup>lt;sup>6</sup> 2010 U.S. Census data for single family household size used in 2020 UWMP

<sup>&</sup>lt;sup>7</sup> Pacific Institute at www.pacinst.org/water-efficiency-and-reuse

In 2040, under normal year conditions, **Table 3** shows that the volume of supply available above that needed to meet demands is projected to be 195 AFY plus 21 AFY contributed from operation of the WRF for a total of 216 AFY. This supply is sufficient to serve approximately 1,172 new household connections at a 2040 total per capita use rate of 81.4 gpcd derived from the 2020 UWMP and presented in **Table 8**. This service capacity is based on the residential use rate of 50.5 r-gpcd projected in the 2020 UWMP and shown in **Table 8**, a rate that is well in excess of the 42 r-gpcd target likely to be presented to the legislature for years 2030 and beyond. Therefore, the estimates presented in **Table 3** of water available above demand as well as the estimated demands that would be imposed by new connections are both likely to be conservative.

During multiple-year droughts, **Table 4** shows a projected volume of water available above normal year demands of 71 AFY, a supply adequate to serve approximately 380 additional household connections using the full 81.4 gpcd total per capita demand derived from values presented in the 2020 UWMP. However, as noted above, during multiple-year droughts, the WRF could be operated to provide as much as 195 AFY of supplemental water yielding a total supply above normal demand of 266 AFY (237,470 gpd). Under this condition, absent reductions in demand, about 52 AFY (27%) of the water supplied by the WRF would be needed to supplement the 71 AFY base supply to support the connection of each of the 665 lots that have pending applications for meter permits.

As noted above, by 2040 it is reasonable to assume that a residential rate of approximately 42 r-gpcd will have been attained based upon revisions to state-wide standards for indoor use. In addition, introduction of state or local standards for outdoor water use, such as a requirement for xeriscaping, would further lower residential demand creating a condition that has the potential to eliminate the need for reliance on the WRF to justify approval of the permit applications now before the CCSD.

#### Conclusion

It is apparent that, as with many other municipalities in California, Cambria is adapting to new realities with respect to residential and commercial water use by making water conservation a way of life. While these realities restrict the quantity of water individual households may consume, they also expand the number of households a water purveyor can reliably serve. Thus, the moratorium on water connections imposed by the CCSD in 2001 is a measure representative of a past era in water management which no longer reflects current and anticipated practices, attitudes, and regulations.

The analyses presented in this report indicate that today, based upon residential water use projections for 2025, there is a basis for permitting 184 additional water meter connections without compromising system reliability for existing users during multiple-year droughts. Based on water use rates reported by the CCSD to the State Board for 2021, rates already lower than

the projections used to support permitting of 184 additional connections, the number of meters that could be permitted under the same conditions rises to 208.

Further, residential standards expected to be introduced in the coming years are likely to make it possible for most of the water meter applications on the district's wait list to be approved without reliance on water provided by the WRF, a condition that will be strengthened when revised state or local standards for residential landscaping, such as a requirement for xeriscaping, are introduced. Finally, although water from the WRF is not needed to justify approval of existing permit applications, WRF water will be available in the future to bolster the CCSD's primary purpose of providing reliable water service to the residents of Cambria.

From: noreply@getstreamline.com

To: <u>BoardComment</u>

**Subject:** New form submission received: Written Public Comment

**Date:** Wednesday, January 25, 2023 12:17:23 PM



# Written Public Comment

First Name:	Lauren
Last Name:	Younger
Address:	
Email:	
Written Public Comment:	Regarding the CCSD 6-month plan, number 6 under Facilities and Resouces which refers to the restroom permitting: It refers to restrooms, plural. Is that in one building or does this allow for more to be built? Second, I know we have been assured that any light on the outside of that building will be designed to protect the night sky. However, light bouncing off the ground always travels up the hill that surrounds the rodeo grounds which is where owls live and hunt. Any bouncing light up that hill can affect their ability to hunt and so, they might move on. There is a light on the outside of the restroom so please place the building so that the light faces town, not the hill, to help avoid that bounce. I have not seen a plan for the restroom so I have no idea how the structure has been placed. Please don't finish the permitting process until the owls are considered and protected. Thanks.
Written Comment to be read at::	Board Meeting

Powered by <u>Streamline</u>.

From:
To:
BoardComment

Subject: Letter regarding strategic goals

Date: Sunday, January 29, 2023 6:46:53 PM

January 29,2023

Dear Cambria Community Services District Board,

Strategic Plan Goals

Please remove the investigation of new technologies for brine waste disposal second quarter 2023 from the strategic plan goals. Until the CDP for the WRF is permitted by the county and has undergone all appeals it is premature to spend manpower, time and money when there is a real possibility the WRF will not be permitted for the 250 acre feet desired for the build out of the water wait list. It is more realistic to face the inevitable that the WRF will only be permitted to provide water for current users and to protect the aquifer from subsidence during droughts. It is the insurance policy against draconian rationing the community deserves. If there is no new building allowed the small amount of brine generated for current users can be trucked to south county.

Furthermore the antiquated water master plan potable water supply section is now 18 years old. This section used to justify an additional 250 acre feet of water in the dry season was based on seawater desalination not on brackish water.Rather than spend money and time looking for brine disposal perhaps never needed it is time to declare the Water Master Plan obsolete and remove the 250 acre feet from the regular CDP application before the SLO CO planning department .

Sincerely, Mahala Burton Cambria homeowner From: <u>Elizabeth Bettenhausen</u>

To: BoardComment

**Subject:** Strategic Plan

**Date:** Monday, January 30, 2023 10:19:06 AM

#### MEMO

TO: CCSD Board of Directors FROM: Elizabeth Bettenhausen

DATE: 30 Jan. 2023

SUBJECT: Reason for Strategic Plan, Agenda for Special Meeting Jan. 30-

31, 2023

At your Special Meeting today you will consider the Strategic Plan.

I have one overriding concern about your Strategic Plan.

What is your purpose for this plan?

Put differently:

Why do you have this Plan?

Put differently:

What substantial use do you have for this plan?

Put differently:

How does the community benefit from your Plan?

At your public meetings, you have long discussions of it, item by item, sometimes suggesting a change. But what purpose does this serve? Your discussions very rarely address a substantive issue, and even more rarely, decisively. Instead, you toss notions back and forth--often editorial, come to some sort of agreement, and go to the next item in the Plan. I've heard your use of the Strategic Plan called "busy work" (not my term), and I agree.

Then every 6 months you spend two days of special meetings on...The Strategic Plan!

In one sense, the Strategic Plan is a fancy record of how the staff does some of its work. So is the Strategic Plan a way you oversee how well the General Manager is doing her or his work of overseeing the staff?

I could speculate endlessly about elements of this. For example, how do you decide who will guide the Special Meetings on the Strategic Plan, now that you no longer hire the consultant who got this all going, at the request of former General Manager Weigold, who fell in love and has left? I conclude that today and tomorrow you will need the expertise of an accountant, given former Director Steidel's background. I spare you and me additional possibilities.

What exactly do you want to achieve by giving so much insubstantial attention to this Table of Goals and Objectives, again, and again, and again?

Please include this Memo in all public records of your Special Meeting.

Sincerely,

Elizabeth Bettenhausen
Full time resident of Cambria since March 2002



view from Shamel Park ramp, 24 Jan 2023 What causes these shapes?

## **Haley Dodson**

From:

Dennis Dudzik

Sent:

Monday, January 30, 2023 10:28 AM

To:

BoardComment

Cc:

Ray Dienzo

Subject:

Strategic Planning Meeting Topic: Cambria Offshore Wind Leases, Community Involvement, and Potential Benefits

Additional input to today's Strategic Planning Meeting: Cambria Offshore Wind Leases, community involvement, and impacts and potential benefits to Cambria:

Board Members, here is some of the matirial I have shared with Acting Director Dienzo in this regard. Although may seem like more of a "long range planning" issue than dealing with ending the moratorium, it is nonetheless a key issue as regards planning for the future. I will be pleased to discuss this with you this afternoon.

The following is some timely background on the California Offshore Wind (OSW) process, links to associated websites, auction results with maps, project impacts, and possible "investments" that could benefit Cambria.

The US Bureau of Ocean Energy Management (BOEM) is driving this California OSW Lease, permitting, and ultimate OSW development process. The BOEM Director made the following commitments based on the BOEM's requirements for Tribal and Community collaboration:

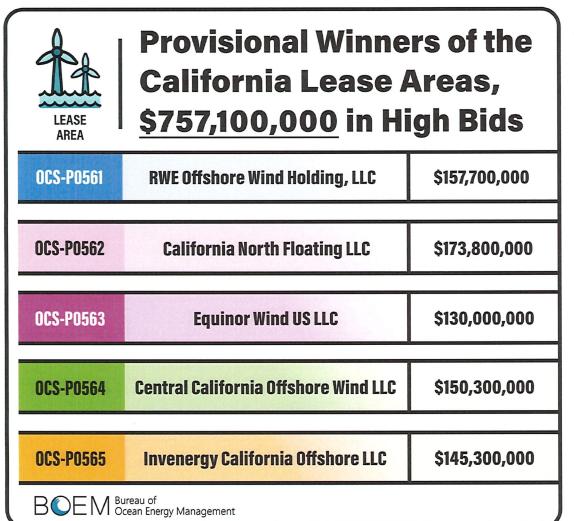
"The innovative bidding credits in the California auction will result in tangible investments for the floating offshore wind workforce and supply chain in the United States, and benefits to Tribes, communities, and ocean users potentially affected by future offshore wind activities. This auction commits substantial investment to support economic growth from floating offshore wind energy development – including the jobs that come with it," said BOEM Director Amanda Lefton. "These credits and additional lease stipulations demonstrate BOEM's commitment to responsibly grow the offshore wind industry to achieve our offshore wind goals."

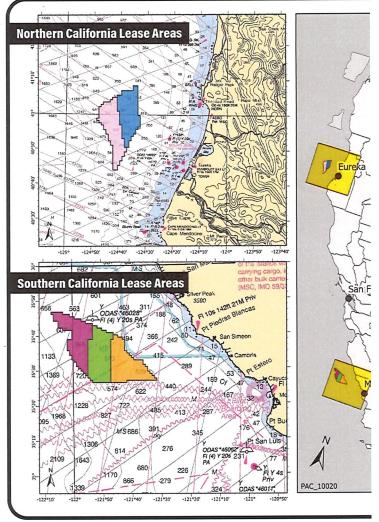
Link to Central Coast Community Support Letter: <a href="https://reachcentralcoast.org/offshore-wind-support-letter/">https://reachcentralcoast.org/offshore-wind-support-letter/</a>

The list of contacts are at the end of the support letter. I suggest that you communicate with SLO County Supervisor Bruce Gibson (or your best County Staff contact) and as many of these other folks contacts, and have them help you track down who can best get you integrated into the ongoing process.

Also, see the following link to The Tribune's article published three days ago. Very informative: <a href="https://www.sanluisobispo.com/news/local/environment/article269670421.html">https://www.sanluisobispo.com/news/local/environment/article269670421.html</a>

This is BOEM's lease auction summary: (Note the three Morro Bay Lease Areas' proximity to Cambria.)





Here are some of the impacts and potential benefits for Cambria:

Since Cambria is one of the closest communities to the three "Morro Bay" OSW leases, visual, recreational, and environmental project impacts may be particularly significant. Also, the boundaries of the existing Monterey Bay National Marine Sanctuary and the proposed Chumash Heritage National Marine Sanctuary would come together off the coast of Cambria, and there have been discussions of a corridor for the sub-sea high voltage transmission cable(s) making landfall somewhere between Cambria and Morro Bay.

OSW developers and regulators are currently focused on thousands of megawatts OSW power being generated close to Cambria for delivery to distant load centers over new and upgraded high voltage transmission lines. In light of the California coastal communities' long term need for new water sources and the high cost of building and upgrading transmission lines, the discussion needs to re-focus on using a portion of the power locally to power new coastal potable water sources. For example, OSW wind energy could be dedicated to operating Cambria's WRF and the proposed SLO DESAL Project, or to power a new onshore or even offshore ocean water desalination system piping potable water directly to the CCSD. Using a portion of OSW energy locally to power water generation and distribution facilities is a win-win.

These are not far-fetched ideas. The regulatory environment in California has changed. The California Coastal Commission has recently approved the new Doheny Ocean Desalination Plant, with more approvals to follow. Also, see the three links below for two Offshore-wind-to-water systems.

https://www.offshore-mag.com/renewable-energy/article/14197799/consortium-develops-windpowered-offshore-desalination-system

https://www.businesswire.com/news/home/20220908006133/en/Innovative-SeaWell-Desalination-Buoys-Proposed-for-Vandenberg-Space-Force-Base

https://www.slc.ca.gov/renewable-energy/vandenberg-draft-pea/

Feel free to call, text, or email any time.

Best regards,

Dennis

Dennis A. Dudzik, P.E.

- Director Cyclone Power Technologies, Inc.
- IAASP President & Founder
- AECOM Senior Advisor

From: noreply@getstreamline.com

To: Haley Dodson

Subject: New form submission assigned to you: Written Public Comment

Date: Monday, January 30, 2023 10:44:01 AM



# Written Public Comment

First Name:	Jim
Last Name:	Townsend
Address:	
Email:	
	RE: January 30th Strategic Plan Review Meeting Public

RE: January 30th Strategic Plan Review Meeting Public Comment Dear President Dean and members of the Board of Directors: Thank you for the opportunity to provide these comments on the Strategic Plan review and update. Having reviewed the agenda packet for today's Strategic Planning meeting, I note there appears to be no mention of the permanent replacement for the main water service line that failed in December 2021. It is hard to imagine anything being a higher priority than the permanent replacement of the temporary line lying on the ground within the State Park wetlands. Please prioritize a permanent fix to this critical District infrastructure. The CCSD Board should work provocatively to repair its fractured relationship with the Coastal Commission. Like it or not, the Coastal Commission has the final say on many of CCSD's projects and activities. There is nothing to gained, and much to lose, by continuing to ignore the Commission's concerns. A big step in repairing that fractured relationship would be to amend the current CDP application for the WRF, to make it clear that the WRF will only be used to provide drought protection for existing users, as it was originally sold to the voters. The Board should consider an independent review of the entire WRF project, especially the inability of staff to complete even

an application for a non-emergency permit for the facility

Written Public

Comment:

nine years after its construction. There are plenty of other issues for the Board to address. The crazy expensive restroom project on the East Ranch is looking like it's going to cost more than my house, while providing very limited benefit to the community at large. The project should be re scoped, with an eye towards to reducing its cost, its impacts on the surrounding neighborhood and ongoing maintenance expenses. Financial data regarding major capital projects such as the WRF and upcoming WWTP upgrades should be provided to the ratepayers in a complete and understandable manner. Staffing issues at the management level need to be addressed. Frequent turnover and ongoing litigation involving the District's office staff does nothing to advance the District's mission. There's clearly something seriously amiss when senior admin staffers aren't allowed the in the building. Finally, I'd suggest that Board members take a peek at the video from the recent county Board of Supervisors. It is not only necessary, but possible to take bold actions to deal with the issues discussed above. It only requires leadership. Thank you for your service, Jim Townsend

Written
Comment
to be read
at::

**Board Meeting** 

Reply / Manage

Powered by Streamline.

From: <u>Tina Dickason</u>

To: BoardComment

Subject:CCSD Strategic Plan MeetingsDate:Monday, January 30, 2023 12:09:56 PM

#### Good morning CCSD Board,

I will not be attending the meetings for the Strategic Plan. I have seen no positive changes since the previous Strategic Plan meetings, and I rather doubt anything will be forthcoming of substance from this meeting. It is worth noting under your first goal that we have a **sensitive** ecosystem--I'm sure that will be addressed by regulatory agencies as the CDP moves forward.

Water Services -General Meet the ongoing challenges of effectively and reliably managing water resources in our sensitive ecosystem

How did former CCSD Director Cindy Steidel become the facilitator for this meeting? Who made this decision and why? This is just another example of why I cannot trust certain elements of the CCSD. I hope the CSDA training you will be participating in, may help in this area and many others.

The first item of business in your plan should be hiring a new GM; it's not even on the list!

Regarding last year's #1 goal--improved communication with the public--that has not been accomplished. Our District appears to operate under a shroud of secrecy.

A serious look needs to be taken at the role of the Standing Committees and the tasks assigned to them. The Board needs to have important issues brought before it--too much is tasked to the Standing Committees, which also means that members of the public, in order to stay informed, are expected to attend at least 5 meetings a month--that does not speak well of an agency's ability to handle the work by those who are hired and elected for a community of 5,700.

Having attended the December 12, 2022, R&I Committee meeting, is a prime example of why the District Engineer (or any member of staff) should be giving such reports directly to the Board--not, after presenting it first to the R&I Committee. Not a single member of the R&I Committee had a question about Mr. Dienzo's report, yet 4 members of the public raised issues with his presentation, as did Coastal Commission staff.

When will the crucial replacement of the Stuart St. tanks be addressed and taken care of?

Please remember the \$17 million rate increases incurred last July 1, and why--to pay for much-needed CIPs at the WWTP. I hope you will have an answer as to when work might begin on those CIPs.

When will the temporary San Simeon pipeline be addressed for our water supply from San Simeon? Please consider also the effluent pipe--it is old and obviously vulnerable to what occurred to the water pipeline. Our water and sewer Infrastructure needs are of the greatest importance and are the district's primary obligations to the community.

Why is the Zero Liquid Discharge item included in your agenda? This item has not been addressed by the Board in a transparent manner to the public, and a proposal is required from GWI before anything can be done going forward. Again, another instance of the cart before the horse! I suggest taking care of the CDP for the EWS/SWF/WRF. We have only been waiting and paying \$\$ millions more than was originally estimated, for almost 9 years! This is an indication of extremely poor leadership and incompetent staffing.

WRF--Instream Flow Study Report--when will the public be hearing of the study performed by Stillwater Sciences?

I have only touched on a few items, there are many more.

I hope you will have a productive and meaningful meeting that will actually result in some issues that seriously need to be addressed, not pie-in-the-sky dreams.

Regards, Tina Dickason From: Christine Heinrichs
To: BoardComment

Subject: Public Comment January 30 2023

Date: Monday, January 30, 2023 1:40:02 PM

Please include in Written Comment:

#### PUBLIC COMMENT

I have comments in several areas.

On **Water Resources:** What's holding up the Stuart Street tank replacement? The money was allocated in August. Does the district need to contact Rep. Carbajal for help moving this along? Or is the hang-up at the district? Please get the public a report on this important project.

The **Coastal Development Permit**, I ask the board to consider what the district's actual intentions with regard to the EWS/SWF/WRF, and its required Coastal Development Permit, are. After reviewing some of the project's history, I noticed that the board's decision points have usually chosen the path that will lead to delaying the project.

Back in July 2019, the board hired Paavo Ogren, for \$25,000, to advise the district on how to get the CDP. He was familiar with the project, and the CDP process, having been employed in public works capacities in SLO County for many years. It seemed a smart move.

Mr. Ogren gave his report to the public and the board at the November 21, 2019 meeting. <a href="https://slo-span.org/meeting/ccsd">https://slo-span.org/meeting/ccsd</a> 20191121/

He had worked with the county and the Coastal Commission, and had the pieces in place to get the CDP approved – provided that the district apply for a permit for the plant as built, to serve existing users only. He explained other choices, with proposing to expand connections to 4,650 as the one requiring the highest level of findings and most difficult to get.

At that meeting, the board appeared to support Mr. Ogren's recommendation to apply for a permit for the project as built, to serve existing users only. The board, under President Dave Pierson, referred the project description and application to the P&I Committee, asking for a recommendation that could then be submitted to the county.

Somehow, the R&I Committee never took the subject up. It's not on their agenda in the following months. Instead, General Manager Weigold presented a project description for that most difficult permit at the June 25, 2020 meeting. <a href="https://slo-span.org/meeting/ccsd">https://slo-span.org/meeting/ccsd</a> 20200625/

After three hours of discussion, including all the arguments against it, the board decided, by consensus, without a motion or a vote, to submit that project description, knowing it would be unlikely to be approved.

Sure enough, it wasn't, and still isn't.

Mr. Ogren also advised the board not to change the project's name. it had already had two names, and a third raised the possibility of more confusion. The board changed the name again, to Water Reclamation Facility.

At that 2020 meeting, Mr. Dienzo discussed the studies that would be required. Nearly three years later, the studies remain incomplete.

Deadlines blown past – the promise that the application would be completed by the end of 2022, the biological studies, which were under contract to be completed in September, are perhaps done, or not, I've heard no report on their status. Mr. Dienzo now proposes yet more changes, that Coastal Commission Environmental Scientist Tom Luster described as one step forward, two steps back. The board appears satisfied with that plan. The board rewarded Mr. Dienzo by promoting him to acting general manager.

Please, take this Strategic Planning workshop to decide what direction it wants to lead the district in pursuing. If you want to get a Coastal Development Permit, follow the advice you paid Mr. Ogren for three years ago. If you do not want to get a Coastal Development Permit, keep doing what you're doing, because it's working.

The **Wastewater Treatment Plant Financing Working Group** is new. Director Gray has said that the Finance Committee needs to meet only quarterly because it doesn't have much to do except review reports. How can this be? Isn't the Finance committee involved with this \$12 million of Wastewater Treatment Plant upgrades? Why add a new committee, which lacks public members as the Finance Committee has?

Improving Public Communication formerly was the district's top priority, although it isn't mentioned in today's agenda. I send occasional messages to board members, a couple in the past week about this meeting. One board member responded with interest. One responded that she wasn't on the board when the issue I addressed came up. That's a kind of non sequiter. Neither was I, but I watched meetings and read documents. Does she suggest that only board members can be informed about district issues? The third referred me comments to the board president. The other two ignored my message. Out of five members, only one even responded to the substance of my message.

As with the CDP, the board states one goal while actions pursue another. Ignoring the public ends board communication right there. The board's definition of Improving Public Communication appears to be Pretending the Public Has Nothing To Say. Elected officials are required to engage with their constituents and address their concerns. That is what the job is. State and federal elected officials respond to my inquiries. The board, in this small community, should, too.

#### **FACILITATOR**

The board changed its practice of hiring a neutral professional facilitator for the Strategic Planning Workshop in favor of inviting former CSD director Cindy Steidel to facilitate the workshop. Ms. Steidel was a polarizing figure on the board. She is unpopular with many Cambrians. Choosing her to facilitate this workshop makes a statement of partisanship that sets the stage for division in the coming year. I'm sorry that the board has decided to begin 2023 with a controversial and divisive choice.

Sent from my iPad