

Haley Dodson

From: Tim Borden [REDACTED]
Sent: Sunday, February 4, 2024 6:11 PM
To: BoardComment
Subject: CCSD Draft Coastal Development Permit Project Description - February 8, 2024

Please read this concern at the February 8, 2024 Board Meeting.

Regarding Connections Served: This was initially voted on and approved for existing water connections during stage 3 drought conditions. This new proposal mentions that assessments will determine whether the WRF is sufficient to fulfill existing commitments.

What are these existing commitments, are they in writing, can you provide me with a copy of these commitments? Shouldn't this be resubmitted to the voters as you are proposing to change the voted-on use of the facility?

From: [Tim Borden](#)
To: [BoardComment](#)
Subject: CCSD Draft Coastal Development Permit Project Description - February 8, 2024
Date: Sunday, February 4, 2024 6:22:03 PM

Please read this at the February 8, 2024 Board Meeting

Regarding Operations: It was voted on that there would be an existing employee to perform visual inspections of the site twice a day. (No new employees)

The new proposal allows for up to 6 employees per day in shifts. Are these existing employees or new hires? If they are new hires what will the costs be: training, benefits, salaries, tools and equipment?

From: [Tim Borden](#)
To: [BoardComment](#)
Subject: CCSD Draft Coastal Development Permit Project Description - February 8, 2024
Date: Sunday, February 4, 2024 6:35:18 PM

Please read this at Board Meeting February 8, 2024

Regarding Brine/Salt Disposal Methode: How much is the Zero Liquid Discharge (ZLD) facility going to cost? This technology has not been tested per the WRF Concentrate Disposal Ad-Hoc Committee dated 11/8/2023. How many truckloads of the brine concentrate will be hauled away and at what cost?

If the ZLD facility is not successful, how many truckloads per day will be hauled away and at what cost?

From: [Dennis Dudzik](#)
To: [BoardComment](#); [Haley Dodson](#)
Cc: dudzik@calweb.com; [Matthew McElhenie](#)
Subject: Strategic Plan Community Input
Date: Thursday, February 1, 2024 6:28:32 PM
Attachments: [CCSD Strategic Plan Input for 2-8-2024-DD.docx](#)
Importance: High

Haley,

Attached please find my additional community input on the key areas identified for the upcoming Strategic Plan workshop. Also, please note that, as specified by the Board (see quote), my input includes the following request:

As stated in the CCSD Strategic Planning Process, approved 11/16/2023, "In minor updates, the Board will only review and update the Objectives and Supporting Actions for each Strategic Goal. However, at the discretion of the Board President, the Board may consider refinements to other components in the plan as needed." All of the recommendations herein more than rise to the level of importance and urgency which warrant significant refinements to the Strategic Plan - now.

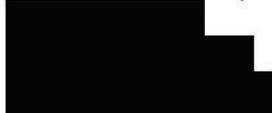
The Board president is hereby requested to exercise that discretion, so that the Board can and will consider and implement the associated Strategic Plan refinements during this 2024 Strategic Plan Update.

Please feel free to let me know if any other input is needed.

Thanks much,

Dennis

Dennis A. Dudzik, P.E.



Community Input for Strategic Plan
SPECIAL MEETING OF THE CAMBRIA COMMUNITY SERVICES DISTRICT BOARD OF DIRECTORS
February 8, 2024
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) is in addition to the on-line survey input my wife and I have provided. This additional input 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 updates to the current Strategic Plan.

As stated in the CCSD Strategic Planning Process, Approved 11/16/2023, *“In minor updates, the Board will only review and update the Objectives and Supporting Actions for each Strategic Goal. However, at the discretion of the Board President, the Board may consider refinements to other components in the plan as needed.”* All of the recommendations herein more than rise to the level of importance and urgency which warrant significant refinements to the Strategic Plan - now.

The Board president is hereby requested to exercise that discretion, so that the Board can and will consider and implement the associated Strategic Plan refinements during this 2024 Strategic Plan Update.

Executive Summary

This input and associated analyses are an update and expansion of comments that I provided to the Board one year ago. The first five input items below (Water Supply and Demand Planning) address the fact that the current Strategic Plan fails to plan for Prudent and Responsible Levels of Infill Development, ending the water moratorium, and bolstering Cambria’s water supply.

Item six below (Fiscalini Ranch Preserve Management) addresses the critical weakness in the strategic plan, in that it has no plan to address urgent, required flood risk reduction actions associated with the Fiscalini Ranch Preserve (FRP) and Santa Rosa Creek.

Water Supply and Demand Planning

This water supply and demand analysis assumes that all data and forecasts contained in the CCSD’s 2020 Urban Water Management Plan (UWMP) are correct. It incorporates subsequent analyses of the UWMP for the purpose of determining whether there is justification for continuing the moratorium on new water connections, and how this affects the CCSD 2024 Strategic Plan Update. The data and analyses make it clear that CCSD has the capacity and duty to lift the moratorium. Along with this Infill Development will come environmental benefits and improved financial stability and support for the current and future residents of Cambria, and the Board ought to have a comprehensive Strategic Plan in place to address these weaknesses, and 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. **Key Weakness in the Strategic Plan: The Strategic Plan is deficient in that it does not address this issue.**
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. **Key Weakness in the Strategic Plan: The Strategic Plan is deficient in that it does not address this issue.**
 3. The District needs the significant funds that will be generated by the infill development connection fees. **Key Weakness in the Strategic Plan: The Strategic Plan is deficient in that it does not address this issue.**
 4. The District has a legal obligation to be making real progress toward removing the emergency declaration that initially justified the moratorium. The strategic plan ought to include an integrated plan and timeline to reach that goal, while providing improved reliability for the District's water supply systems. **Key Weakness in the Strategic Plan: The Strategic Plan is deficient in that it does not address this issue.**
 5. The California Coastal Commission's (CCC) Coastal Development Permit (CDP) presently stands in the way of the District's operation of the WRF. **If the WRF is all or part of the District's plan to serve the water wait list customers, then the Strategic Plan needs to clearly say so, and a real plan to get there must be included!** However, continued and long-term reliance on one water resource (local groundwater), combined with operation of the WRF, is not a strategy for assuring a reliable and sustainable water supply for Cambria. The Strategic Plan must include a plan and direction to Staff to secure a portfolio of large and small supplemental water supplies. **Key Weakness in the Strategic Plan: The Strategic Plan is deficient in that it does not address this issue.**

Fiscalini Ranch Preserve Management

6. The Strategic Plan fails to address maintenance-related flood risk reduction actions associated with the Fiscalini Ranch Preserve (FRP) and Santa Rosa Creek, which now requires additional funding to conduct significant invasive, non-native, and fallen tree removal, as well as bank stabilization and corrective actions within the FRP along Santa Rosa Creek.

Addressing and correcting these weaknesses in the Strategic Plan is in the best interest of the Cambria community, and the right thing to do.

Key Facts and Supporting Data

The following are key facts and supporting data for the above six input items that must be fully considered by CCSD Board and Staff, and documented as part of the development of the 2024 Update of the CCSD's Strategic Plan. In addition, since CCSD Staff and Committees have recently begun to collect and review these and related studies and potential water supply resources, the Strategic Plan must be updated to encourage and direct more in-depth and active efforts. The results of Staff and Committee investigations also need to be integrated into this Strategic Plan Update.

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. The County Board of Supervisors also certified the associated EIR, which adopted the 4,650 existing and future housing units and this was subsequently incorporated into the San Luis Obispo County North Coast Area Plan.

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 infill development 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 demonstrate 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.

On 9/13/2023 GEI Consultants completed their follow-up Review and Analysis of the San Simeon Creek Instream Flows Assessment. This GEI document examines the methodology and conclusions of the Stillwater Sciences assessment and the implications of these conclusions on the findings of the 2020 Urban Water Management Plan – Review and Analysis (GEI 2022).

GEI found that the findings of the Stillwater Sciences assessment do not alter the conclusions drawn in GEI's 2022 report regarding the availability of water to support approval of these water meter connections. Stillwater Science's findings indicate that these conclusions hold under existing conditions and would continue to hold were the WRF to be permitted under a regular CDP.

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 Infill Development Plan are immediate priorities. Now, in 2024, it is more critical than ever, that these data be incorporated into the District’s Strategic Planning process, and that these results be communicated to the CCC and San Luis Obispo County staff.

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 led 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
<i>Source: U.S. Decennial Census</i>			

3. Benefits of Infill Development

Ending the moratorium, with a program of Safe, Balanced, Infill Development 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 ongoing 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 reports, update the CCSD Fee schedule, assess the benefits, and quantify the range of outcomes of varying levels of Safe, Balanced, Infill Development.

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).

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

** 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. Making real progress for our 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 our \$5,000 share of the cost of road paving and berm.

The CCSD Moratorium on planned and approved infill development 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 23 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. There are real benefits to the Cambria community, and real costs associated with inadequate high-level planning. As such, planning and implementing a Safe, Balanced, and Infill Development Plan must be an integral part of the District's Strategic Plan.

5. Regulatory Roadblocks and Cooperative Water Resource Planning

Past CCSD Boards have stated that, relative to the uses of water from the WRF, the CCSD's hands are tied by CCC, County, and other regulatory bodies' processes and decisions. It is the District's responsibility to live up to its obligations by planning and acting with clear purpose and direction. The current Board and Staff have begun to make progress toward this goal, but more is required - now.

The current Strategic Plan contains the following three relevant Strategic Goals: MEET THE ONGOING CHALLENGES OF EFFECTIVELY AND RELIABLY MANAGING WATER RESOURCES IN OUR SENSITIVE ECOSYSTEM; ADVANCE COASTAL DEVELOPMENT PERMIT (CDP) TO ACHIEVE COUNTY AND COASTAL

COMMISSION APPROVAL; and MANAGE AND PROVIDE STEWARDSHIP OF DISTRICT ASSETS, PARKS, RECREATION, AND OPEN SPACE IN A TIMELY, COST-EFFECTIVE, AND ENVIRONMENTALLY SENSITIVE MANNER

The CCSD Staff have met with the CCC and SLO County, and are working with them on a path forward for the Coastal Development Permit for the WRF. To date, the public has not been a significant part of that process, and nothing in the Strategic Plan speaks to current efforts to limit the project description to the WRF serving existing customers. Also, nothing in the Strategic Plan explains how (or if) the District intends to secure the use of the WRF to serve the wait list customers, and when, if ever!

6. Fiscalini Ranch Preserve Management

As the community is well aware, rain, heavy winds, and mudslides took Cambria by surprise as we got inundated by 8.4 inches of rain between March 9 and 14, last year. The rain that slammed Cambria on March 10 caused Santa Rosa Creek to rise more than 16 feet that morning, hitting its peak of 21.24 feet by 11:51 a.m. on March 10. The (former) CCSD Fire Chief admitted that he was caught "off guard," since it happened without any warning. Fire crews went to Oak Terrace Mobile Home Park, where they were able to go from door to door in order to evacuate 14 individuals to the Santa Rosa Catholic Church next door. The flooding also impacted the CCSD Facilities and Resources department located on Rodeo Grounds Road, to the point where the staff was displaced, and relocated to the Veterans Hall. Those facilities are now being renovated.

Inspection of the south (FRP) side of the creek bank reveals accumulations of large, recent, and decaying tree trunks (more than a foot and a half in diameter) with considerable overgrowth. These are cut and lying along the creek bank, impeding water flows during high water conditions. In contrast, the north bank is clear of such debris. Based on reports from long time homeowners and as evidenced by historical relocations of the Oak Terrace south fence, the northern bank of the creek is steadily eroding, creating even more risk to homeowners.

It is apparent from the decay and overgrowth, that this maintenance on the FRP could have been going on for decades. Although this practice might have been initiated and persisted due to the cost of removal of large fallen trees, or the desire to keep removal equipment activities to a minimum, the long-standing practice must end, and be replaced with removal and restoration of the southern stream bank drainage. The entire length of the creek, from East FRP out to the ocean needs to be "unclogged" and maintained, with non-native aggressive plants and trees removed (some planted by the US Army Corps of Engineers in 1997).

The potential for increases in the frequency and magnitude of severe storms in the Santa Rosa Creek watershed have had, and (if left unchecked) will continue to have a negative impact on the homes and businesses in Cambria along Santa Rosa Creek, as well contribute to and increase CCSD's costs of managing the Fiscalini Ranch Preserve. As such this is an urgent matter that required clear direction from the CCSD Board, with specific short and long-term planning milestones and adequate funding.

The District Staff continue to actively pursue solutions to this critical situation, and are working with all affected agencies in this regard. And, they are to be applauded for their efforts! Nonetheless, the Board needs to support their efforts with thorough and prudent planning and funding.

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 Infill Development Plan as well as FRP flood risk reduction efforts the attention required in your Strategic Plan.

Respectfully Submitted:
Dennis A. Dudzik, PE
Resident - Cambria, California

From: [Ron Keck](#)
To: [BoardComment](#)
Subject: Strategic Plan 2024
Date: Friday, February 2, 2024 4:07:01 PM

Dear CCSD

Securing a CDP for the WRF must finally be accomplished for 2024. Cambria needs this for so many reasons. The Strategic Plan and CDP must include the ability to lift the moratorium which the CCSD is legally and morally obligated to do.

We lived part time in Cambria for 17 years and watched nothing get accomplished. We listened to neighbors and locals protest any method to provide additional water which would allow the moratorium to be lifted, but continued to add bathrooms and even build separate structures with bathrooms and kitchens on adjoining lots they would pick up on the cheap. Not fair by any standard.

Interestingly any rate increase would be met with petitions and protests, yet the same people would complain that CCSD is not maintaining the water and sewage infrastructure.

CCSD revenue is hurt severely by the double whammy of selling less water due to conservation and not receiving new hookup fees for over 20 years. Something has to give, someone has to pay to maintain the system.

This is Cambria's best chance to secure a CDP to guarantee the water supply, and it must include the ability to lift the moratorium and issue intent to serve letters and collect hook up fees to pay for the WRF and maintain the community infrastructure.

The strategic plan must include these features. It is best for both current and future residents of Cambria. Thank you for your time.

Sincerely
Ron and Donna Keck

Sent from my iPhone

Haley Dodson

From: Joan Linton [REDACTED]
Sent: Monday, February 5, 2024 5:44 PM
To: BoardComment; Joan Linton; Bruce Linton
Subject: CCSD meeting to consider Strategic Plan

To the CCSD Board of Directors

Cambria has been frozen in time since 2001. While the rest of California confronts its issues regarding air quality, water insecurity, food production, wildfire suppression and a housing shortage, Cambria has been stagnant, seemingly unable to move forward with regard to its inverse condemnation of 665 lot owners. We property owners pay annual property taxes, annual water list fees, maintain our weeds and have been undeniably patient for 23 years since the "emergency" water moratorium was put in place. We have been unable to utilize our properties in any way. We deserve much better.

While there may have been a water emergency in 2001, in 2024, there is none. As of OCTOBER 31, 2023 the state was declared drought free. The recently re-named Water Reclamation Facility (WRF) was built to accommodate the emergencies that Cambria might encounter during drought years, yet no-growth proponents have successfully managed to stop all new building in town for more than two decades and are apparently very comfortable mothballing this 12.7-million-dollar project without regard for state and federal taxpayer monies invested to build it.

While the entire community would likely benefit from new growth with hookup fees and increased revenue from property tax revenue, not to mention increased sales tax and merchant revenue from new homeowners, Cambria remains frozen in fear that the community cannot accommodate its own Water Master Plan with regard to development build out. The reports have seemed to indicate otherwise. There has been endless obstruction and refusal to move forward.

It is safe to say that the entire state of California is, has been and will be confronted with water insecurity in the years to come. Cambria is no exception and is not the only community within the 57 counties and 482 municipalities in the state that share this problem. Most communities like Dana Point with its plan for the Doheny Ocean Desalination Project are facing their water insecurity issue head on. Not Cambria. We already have a desalination plant that was completed in 2015. It most likely can be fine-tuned to serve the needs of all of the residents in town including the construction of 665 new homes.

There is a housing shortage in the state, particularly near urban and suburban hubs, like Paso Robles and SLO. Cambria is among those communities in which the fear of growth has simply become toxic. It is time for Cambria to engage in the solution.

There is no legitimate cause to deny the lot owners of Cambria their property rights. Currently there is no drought in California, the WRF should be a functional component of the water insecurity solution moving forward. All of the property owners in Cambria deserve better.

Although objections from the Coastal Commission (CCC) are to be expected, it is incumbent upon the CCSD Board of Directors to find a way to negotiate with the CCC on this matter in order to serve their constituents. The CCSD Wait List is composed of infill lots. None of these are likely to endanger access to coastal land. Cambria took progressive action when they built the WRF and then did so again when they developed a Water Master Plan and architectural guideline for new construction. Now it needs to take progressive action insuring that all property owners are allowed to build on their lots. The first step in this process would be to develop their Strategic Plan to move forward and to start issuing residential building permits from the Wait list.

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All the best,

Joan and Bruce Linton

[Redacted]

Wait List # 213

[Redacted]

From: [DOUG PUGH](#)
To: [BoardComment](#)
Subject: Water moratorium
Date: Friday, February 2, 2024 5:16:31 PM

I respectfully ask that you consider the possibility of opening up some water positions. I have been on the waitlist for nearly 20 years. When I bought my lot I was assured by the realtor that the water moratorium was only temporary! Obviously, that was not the case. Like many others I bought my lot with the intention to build and with the assurances by members of the community i.e. realtors that dream was a reality. The dream has turned into a nightmare! We have been kicking this problem down the road for far too long and we need to resolve it. I understand the concerns of some of the community but I honestly believe that a limited controlled building of new homes it's not only beneficial to the community but to the Cambria community service districts as well. Infusing much needed revenue for other projects and improvements. I appreciate the opportunity for this input and look forward to the upcoming board meeting.

Sent from my iPhone

From: [Frank Scozzari](#)
To: [BoardComment](#)
Subject: CCSD Board Meeting, FEB 8, 2024
Date: Friday, February 2, 2024 10:53:20 AM

Public Comment:

Over 40 years ago the CCSD made a promise to lot owners that they would provide them water. In making this promise, the CCSD created a water waitlist and required lot owners to make a deposit to the District in the amount of \$4,711 (since refunded) in order to have a position on the official CCSD Water Waitlist.

On July 1, 2003, the CCSD implemented a "waitlist annual administration fee" (currently \$88), which, in essence, furthered the promise of eventual water.

In early 2006, the CCSD came out with a "Buildout Reduction Plan." In this plan, the CCSD included the then 701 CCSD waitlist positions and stated, "The 701 properties on the CCSD waitlist will receive water connections during the 22-year projected life of the Buildout Reduction Plan" (per Buildout Reduction plan brochure mailed out to property owners). We are now four years away from that promise being completed.

Over all these years, in good faith, property owners have paid taxes, conducted annual weed abatement, and complied with all rules associated with maintaining a waitlist position. I think it's time the CCSD makes good on their promise, which can be done by releasing water connections now pursuant to the County's growth allocation while the District continues to pursue final approval of the Water Reclamation Facility.

Respectfully submitted,
Frank Scozzari



From: [David Valeron](#)
To: [BoardComment](#); [Deryl Robinson](#); [David Valeron](#)
Subject: Public Comments- Board & Strategic Plan Meeting- 02/08/2024
Date: Monday, February 5, 2024 11:42:13 AM

To whom it may concern,
Please include our public comments to the minutes of the upcoming planning meeting:

We purchased our property on Jean Street in March 1989 with a water wait list # of 446.

For almost 35 years, we have been waiting for the moratorium to end so we could build our retirement home. While waiting for the moratorium to be lifted, we have built two homes in Wrightwood (CA) and Fallbrook (CA).

It is our understanding that there is no need for this moratorium as the original premise of the "water emergency" no longer exists.

Upon receiving permission to build ("intent to serve" letter) we plan to develop our property and build the aforementioned home.

The economic impact for the area will be positive as the building of new single family homes will not only generate more property tax revenue it will create local jobs in the construction, supply chain, logistics and hospitality sectors. In addition, it will help alleviate the critical housing shortage in the State of California.

Please come up with a plan to lift this moratorium and allow us to build our new home before we pass away.

This situation has been going on way too long!

Thank you.

From: [Paul Wellenkamp](#)
To: [BoardComment](#)
Subject: Comment on WRF Draft Project Description
Date: Monday, February 5, 2024 5:19:13 PM

This is a citizen comment in connection with the February 8, 2024 Public Hearing on the Draft Project Description for the Water Reclamation Facility Permit Application

I am a Cambria homeowner and part-time resident since 2005. I have been regularly visiting Cambria since 1990.

I have the following comments and questions:

First, the Application refers to serving existing connections as a "primary" intent for operating the WRF. Possibly serving additional connections is another intent. It is unclear whether serving additional connections is another primary intent or a secondary intent. Characterizing serving existing connections as a primary intent implies that there are other intents or purposes. The Application fails to adequately describe them.

Second, the Application refers to possibly serving "existing commitments" in the future, but fails to describe what those commitments are. "Existing connections" has an unambiguous meaning. "Existing commitments" does not. The Application does not even vaguely describe what is meant by possibly serving those additional connections.

Third, the Application seeks far more capacity than appears to be necessary to relieve drought emergencies. If I understand the materials, drought relief may require operating the WRF several hours per day for four months per year, or thereabouts. The Application seeks 24/7 for six months, without guidelines as to when it will operate short of that.

Since its inception, the question about whether the WRF will be used only to relieve drought emergencies for existing connections or whether it will provide the capacity to serve additional connections has been unanswered. This Draft does not provide a clear answer. The substantial additional capacity this Application seeks will result in an unknown (or undisclosed) number of additional connections.

A Description which more clearly and directly addresses the issue may be a difficult ask, but it is sorely needed.

Paul Wellenkamp

From: [Laylon Whittaker](#)
To: [BoardComment](#)
Subject: Re: Board meeting
Date: Wednesday, January 31, 2024 11:12:24 AM

Ok Please read.

I may show up.

Thank you for finally getting a sign on the dog park that states
Hours

7:30 to Dawn

I will have to giggle as it certainly is tiny.

With all due respect that doesn't solve the problem for the whole rest of the day.

I would still like to comment that when the EIR was done, it was years before they took the eucalyptus trees down.

When the eucalyptus trees were up, it did help with a noise barrier for the homes that live above the Dog Park.

The rodeo grounds where the Dog Park has been placed is like an echo chamber you can hear conversations down there between folks. My biggest concern at the moment is one not being able to enjoy our decks because of the barking number two I've been told by two real estate agents that it's going to do value Our home because we have to declare it as a nuisance.

I'll say it again no one in Cambria would trade places with us. we built our home in 1999 way before the ranch was sold. We've even offered to help move the Dog Park, especially the large Dog Park part on the left, which is underneath our deck and my bedroom. I have contacted an attorney which we really didn't want to do but he has said that a dog park is a nuisance and so maybe we can come up with a solution between all of us instead of going that route. I'm not mad at everybody or anybody it's just life is really stressful with this situation.

Thank you.

Laylon and John Whittaker

Laylon

Girl in Charge

Celebrating 32Years

Vaultgallery.com


805-927-0300 Gallery

> On Jan 31, 2024, at 10:16 AM, BoardComment <boardcomment@cambriacsd.org> wrote:

>

> Hi Laylon,

>

> It's good to hear from you. I read your comment at the last board meeting. You are welcome to attend in person or via Zoom to speak or submit another written comment for me to read.

>

> Haley Dodson

> Confidential Administrative Assistant

> Cambria Community Services District

>

> Phone: 805-927-6235

> Email: hdodson@cambriacsd.org

>

> 1316 Tamsen Street, Suite 201

> PO Box 65
> Cambria, CA 93428
>
> www.cambriacsd.org
>

> -----Original Message-----

> From: Laylon Whittaker <laylon@vaultgallery.com>
> Sent: Wednesday, January 31, 2024 9:07 AM
> To: BoardComment <boardcomment@cambriacsd.org>
> Subject: Board meeting
>

> Hi

> I was going to attend but I think you might have enough comments from John and I and I guess one can't speak at the meeting.

> Correct?

>
>

> Laylon
> Girl in Charge
> Celebrating 32Years
> Vaultgallery.com
>

> 805-235-0735 Cell
> 805-927-0300 Gallery
>
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From: [Bill Currin](#)
To: [BoardComment](#)
Subject: Strategic Plan workshop on February 8th 2024
Date: Tuesday, February 6, 2024 4:39:12 PM

Thanks to the CCSD Board of Directors, General Manager Matthew McElhenie and Staff for soliciting input from stakeholders regarding its Strategic Plan workshop on February 8th 2024.

My wife and I have owned several contiguous lots for 20 years, with a water wait list position in the upper third of the 656 position residential wait list. Our original plan was to build our full-time residence there; the passage of time may no longer make that our reality, but it is still our dream.

Ensuring the WRF can operate during non-declared water emergencies seems to benefit all stakeholders, those with and without a voice, including the following:

Holders of water wait list positions—a wait list implies service once water becomes available

Existing Customers—benefit by spreading WRF costs (debt service, maintenance costs, and operating costs) to a larger rate payer group. Connection fees and base rate water and sewer charges also spread the existing infrastructure expense to a bigger group.

Flora and Fauna—habitat will be improved by operating the WRF during critical periods to maintain stream inflow and concomitant stream levels, as well as adding water directly to the San Simeon Creek Lagoon. So doing will improve habitat for steelhead and other riparian species. This seems to be a case where use of the WRF can alleviate our current impacts to the San Simeon Creek riparian habitat

Conditionally, we endorse the CCSD proposal to submit the preliminary WRF CDP application to San Luis Obispo County for their consideration. However, the preliminary plan reasonably and unambiguously needs to accommodate new water connections.

From: [Deryl Robinson](#)
To: [BoardComment](#)
Cc: [Matthew McElhenie](#); [James Green](#)
Subject: Re: Strategic Plan comments
Date: Thursday, February 8, 2024 7:49:07 AM

Thank you for replying because it made me realize I had only pasted part of my actual composition. Here is the whole thing, if you could put it in the record instead.

The District has an obligation to customers who have been waiting over 20 years for service to solve the compliance matters with its water supply and get the moratorium lifted. It is untenable that the Strategic Plan would not have this as the top priority. Failing to do so would be completely arbitrary, and that is not allowed by law.

The Strategic Plan must include a detailed plan of action to complete the process of securing County and Coastal Commission approvals to begin processing the wait list, collecting fees, and issuing intent to serve letters. The Board must give clear direction to staff to make this a priority.

If CCSD is going to abandon this responsibility, it should lose its county authorization as a service district.

Sincerely,
Deryl Robinson

From: BoardComment <boardcomment@cambridgesd.org>
Sent: Thursday, February 8, 2024 5:38 AM
To: Deryl Robinson [REDACTED]
Cc: Matthew McElhenie <mmcelhenie@cambridgesd.org>; James Green <jgreen@cambridgesd.org>
Subject: RE: Strategic Plan comments

Hi Deryl,

Thank you for your public comment.

Haley

From: Deryl Robinson [REDACTED]
Sent: Wednesday, February 7, 2024 9:35 PM
To: BoardComment <boardcomment@cambridgesd.org>
Subject: Strategic Plan comments

Dear Board and General Manager,

The Strategic Plan must include a detailed plan of action to 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.

The District needs the significant funds that will be generated by these connection fees.

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.

It is the right thing to do.

Regards,

Deryl Robinson



From: [REDACTED]
To: [BoardComment](#)
Subject: AGENDA ITEM #5.C
Date: Wednesday, February 7, 2024 9:15:23 PM

(Hello Haley, could you please replace my previously submitted comment with this one? Thank you, Donald)

President Gray, Vice President Scott, and members of the board,

Last year, as we were approaching our peak fire season, Cambria had all the elements set to make for a ‘perfect storm:’

- Ironically, heavy rains had created dense, high grass growth generating more fuel to burn in the dry, fire season, and late rains pushed the date for weed abatement back a couple of weeks, lessening the time for implementation.
- An ineffective fire chief who was not on top of his responsibility of identifying uncleared parcels and informing the CCSD of the magnitude of the problem.
- A new general manager who was unfamiliar with the challenges and was not informed, or kept informed.
- A plethora of well over 500 uncleared undeveloped parcels as compared with the more typical 50-150 undeveloped parcels beyond the clearing deadline.
- A diminishing number of weed abatement contractors and personnel qualified and available to do the work.
- Increasingly devastating wildfires of which the disastrous Maui fire was a reminder of how deadly a mixture of heat, winds, uncut grasses, and downed powerlines can be.

- A trend of increasing absentee property owners who have little knowledge of the area and very little, if any, stake in the community.
- Very little incentive and no fines imposed to encourage uncleared parcel owners to get their parcels cleared promptly, leaving absentee property owners free of the bother of personally engaging a contractor and therefore having their property cleared simply by being billed for the contractor's fee and a nominal administrative fee. No wonder they've left it to the CCSD to do the work ...it's been a 'hassle-free' bargain.

I am glad to see that serious discussion has begun this year as well as new procedures and ordinances being considered regarding the 2024 Fire Hazard Fuel Reduction Program to address these issues.

This is an extremely urgent and important issue for the board to consider. I wrote letters to board members and the general manager accompanied including photos I had taken of the many uncleared lots near my home. Additionally, I spoke before the board last year on these very issues and expressed my deep concern for the safety and well-being of this wonderful community.

After presenting my concerns, immediate action was taken by the general manager to clear the delinquent lots. The points to be discussed in today's agenda are great steps forward in addressing my, and many other community members', concerns.

I hope that the result of this discussion will ensure that there will not be a repeat of last year's chaos and scramble again this year...or in the future. In addition to what has been proposed in the agenda, I think that the district should have more than one weed abatement contractor on call to avoid the situation we had last year where we had an emergency 'all-district-hands-on-board' called by the general manager to get the work

done as fast as possible due to the overwhelming load of uncleared parcels.

In this regard, more contractors should be trained and informed of the clearing procedure and what it entails. In the past, there were informative events available both to property owners and contractors to learn proper weed abatement procedures. Such events should be available in the future.

While I see there is discussion of fines imposed for violations and weed abatement negligence, I would like to see the amount of the fines and penalties spelled out, keeping in mind that the 'stick' should be significant enough to initiate timely action by property owners. These fines should be viewed positively as 'incentives' to action to prevent future disasters and not merely as punishment for being an irresponsible and non-compliant parcel owner.

Thank you,
Donald Archer
Cambria

From: [MARK GARMAN](#)
To: [BoardComment](#)
Subject: Pedestrian safety in Cambria.
Date: Thursday, February 8, 2024 10:55:47 AM
Attachments: [favicon.ico](#)

Greetings,

There is a new state law (AB413) regarding how close vehicles can park next to a pedestrian crosswalk. We have several dangerous crosswalks in Cambria, both in West & East Village. When larger vehicles park in the spaces nearest the crosswalks they can not be seen easily by motorists. Especially if the vehicles are large SUVs or pickups.

Pedestrians often appear from behind these large vehicles suddenly and if the motorist aren't alert suddenly there is a family crossing in front of them.

I suggest we replace those parking spaces nearest these pedestrian crosswalks with "bike corrals". Bike corrals allow 8-12 secure parking spots for cyclists. That provides more potential customers while only using one standard parking slot.

By creating these bike parking zones the most hazardous intersections will become more visible to motorists as well as provide additional parking for cyclists.

In order to conform to the new state law we will need to address these dangerous crosswalk locations anyway. Why not improve Cambria's bike friendliness at the same time. We had several high quality bike racks installed in a few locations in Cambria several years ago but the "bike corral" concept was rejected by some business owners.

Let's make our street's crosswalks safer and compliant with this new law. Please let me know how I can assist. We were able to supply Cambria with three high quality, secure bike racks at no cost to Cambria.

Here is a link to the new state law:

Bill Text - AB-413 Vehicles: stopping, standing, and parking.
legislature.ca.gov



Mark Garman

From: [Crosby Swartz](#)
To: [BoardComment](#); [Tom Gray](#); [Debra Scott](#); [Harry Farmer](#); [Karen Dean](#); [Michael Thomas](#); [Matthew McElhenie](#); [James Green](#)
Subject: Public Comment on 2-8-24 Agenda Item 4.A WRF Hearing
Date: Thursday, February 8, 2024 12:04:56 PM

The draft WRF Project Description under consideration today contains statements about the amount of potable water that the WRF will add to the District's water supply at San Simeon Creek. For example, Table 1 on Page 10 states that 250 acre-feet per year (afy) will be added to the water supply and Table 2 on Page 19 states that 400 gallons per minute (gpm) will be added to the water supply. These performance claims seem high, as noted below. We recommend additional groundwater modeling to verify overall WRF performance before this draft project description is submitted for approval.

Here is a basic performance analysis. The main source of water added to the San Simeon Creek aquifer during the dry season is approximately 278 gpm (400,000 gallons per day) of secondary-treated effluent from the District's wastewater treatment plant. This water is pumped into the San Simeon Creek percolation pond, creating a hydraulic mound in the surrounding groundwater level. Project well 9P7 is located next to the percolation pond, and it pumps water from the mound into the WRF purification system and then on to the project injection well RIW-1. If the continuous pumping rate from 9P7 well is 278 gpm, the WRF is successfully adding 127 gpm of purified water to the District's water supply. (For this analysis, we assumed that 100 gpm is being diverted for lagoon mitigation and 40 gpm for Warren Ranch use. 11 gpm is being trucked away for disposal.)

If the continuous pumping rate from the 9P7 well exceeds 278 gpm, the WRF is not adding any additional water to the supply but is simply moving existing aquifer water from well 9P7 to well RIW-1. Table 2 on Page 19 of the project description states that 581 gpm will be pumped from well 9P7. This discrepancy between well 9P7 pumping rates should be resolved before the project description is submitted for approval.

A quick temporary fix might be to add a disclaimer to Table 2 stating that the pumping flows shown represent peak allowable flows, not expected continuous pumping rates and they cannot be used to predict water added by WRF operation.

We have submitted a detailed description of expected WRF performance, a WRF water flow diagram and recommendations for new groundwater modeling by email to the General Manager and Utilities Manager. We are always available to answer any questions.

Thank you for your consideration of my comments,
Crosby Swartz

From: [Elizabeth Bettenhausen](#)
To: [BoardComment](#)
Subject: Draft Coastal Development Permit Project Description for the Water Reclamation Facility
Date: Thursday, February 8, 2024 12:58:52 PM

Dear CCSD Directors:

The Draft Coastal Development Permit Project Description for the Water Reclamation Facility (DPD-WRF) needs much more work before being submitted as a draft to SLO County Planning Dept. for their response. Several reasons are highlighted here.

1. Zero Liquid Discharge: We must wait until at least the pilot test is done before submitting this DPD. We have no indication whether the discharge will work until this happens, as is evident in the following passages.

1.1 Under Brine/Salt Disposal Method, Regular Coastal Development Permit: "Zero Liquid Discharge Facility. If successful...." (p.11)

1.2 Under Construction Commencement "Primarily existing. ZLD anticipated within 12 months of CDP approval;..." (p.11)

1.3 "The CCSD-preferred method includes the installation of a new Zero Water Discharge (ZLD) facility." (p. 15) See entire paragraph here.

1.4 Under ZLD: "Assuming the ZLD pilot program is successful, the CCSD anticipates constructing a permanent ZLD facility to treat the RO wastewater." (p.15)

1.5 "Without the ZLD facility, under normal operations, three truck trips per day would be needed." (p. 16) The following paragraphs are purely speculative.

"Until the ZLD program is completed, it is unknown how much concentrate will be produced during normal and dry-year operations" (p. 16).

This also assumes that the pilot project will cost the district nothing. But if the pilot project discloses that it is not "inefficient, ineffective, and is otherwise unable to be utilized" (p. 15), what will the new project cost? What is the updated cost of the trucking and receipt from the South San Luis County Sanitation District, should the ZLD be inappropriate?

2. The language for currently existing users is very vague and possibly contradictory.

2.1 "The WRF is primarily designed to meet the current demands of the community and ensure a reliable source of water for the existing connections to the CCSD. However, as part of future operations, evaluations will be conducted through research studies, biological assessments, and considerations of impacts to other stakeholders. These evaluations will determine whether the WRF is sufficient to fulfill existing commitments" (p. 2).

2.2 "While the EWSP is approved to operate only during declared emergency water shortages, the WRF would operate during water shortages and also proactively to prevent water shortages." (p. 8)

2.3 "The WRF would initially serve to satisfy existing connections, but during future operations, impact assessment would be determined based on research studies, biological assessments and impacts to other stakeholders to determine whether this mechanism would be adequate to serve existing commitments,"(p 19).

If the WRF is insufficient to serve existing customers, then what?

What if the WRF is consistently sufficient to serve existing customers, and the ZLD does not get turned on? Is this still Stage 1 (see April 2023 discussion).

Does "existing commitments" include the wait list of ca. 650 new customers?

3. Four attachments to the DPD are included, but in no place is their standing given. How are they to be interpreted? What roles do they have?

This is an important matter, because two (Stillwater) and three (Todd) contradict each other at various points.

In the fourth attachments, all of the comments were made in March 2023 or earlier, almost a year before the current version of the DPD. To what documents are they referring? When will they and the rest of TAC respond to this draft?

4. In Table 2, it is not yet clear where the 400 gpm and 100 gpm come from, and whether they are accurate (p. 18 summation). Put simply, how is it determined that 400 gpm and 100 gpm are produced? Or, where does the 92% loss number originate, and how is its accuracy known?

Thank you for your attention to these questions.

Elizabeth Bettenhausen

[REDACTED]

Cambria, CA 93428

From: [Deryl Robinson](#)
To: [BoardComment](#)
Cc: [Matthew McElhenie](#); [James Green](#)
Subject: Re: Item 4.A - Project Description comments
Date: Thursday, February 8, 2024 1:13:49 PM

Dear Board and General Manager

We also wanted to comment on the draft Project Description. We note the following sentence in the section Water Reclamation Facility Purpose:

The WRF would initially serve to satisfy existing connections, but during future operations, impact assessments would be determined based on research studies, biological assessments, and impacts to other stakeholders to determine whether this mechanism would be adequate to serve existing commitments.

The statement seems miss worded because it says that the project would initially serve existing connections but then later it would be determined whether it's adequate to serve existing commitments. We think It should be clarified to make it clear that in the future - if deemed adequate - it will serve existing wait listed commitments.

Regards
Deryl Robinson

From: BoardComment <boardcomment@cambridgesd.org>
Sent: Thursday, February 8, 2024 8:17 AM
To: Deryl Robinson [REDACTED]
Cc: Matthew McElhenie <mmcelhenie@cambridgesd.org>; James Green <jgreen@cambridgesd.org>
Subject: RE: Strategic Plan comments

Hi Deryl, will do. Thanks.

From: Deryl Robinson [REDACTED]
Sent: Thursday, February 8, 2024 7:49 AM
To: BoardComment <boardcomment@cambridgesd.org>
Cc: Matthew McElhenie <mmcelhenie@cambridgesd.org>; James Green <jgreen@cambridgesd.org>
Subject: Re: Strategic Plan comments

Thank you for replying because it made me realize I had only pasted part of my actual composition. Here is the whole thing, if you could put it in the record instead.

The District has an obligation to customers who have been waiting over 20 years for service to

solve the compliance matters with its water supply and get the moratorium lifted. It is untenable that the Strategic Plan would not have this as the top priority. Failing to do so would be completely arbitrary, and that is not allowed by law.

The Strategic Plan must include a detailed plan of action to complete the process of securing County and Coastal Commission approvals to begin processing the wait list, collecting fees, and issuing intent to serve letters. The Board must give clear direction to staff to make this a priority.

If CCSD is going to abandon this responsibility, it should lose its county authorization as a service district.

Sincerely,
Deryl Robinson

From: BoardComment <boardcomment@Cambriacsd.org>
Sent: Thursday, February 8, 2024 5:38 AM
To: Deryl Robinson [REDACTED]
Cc: Matthew McElhenie <mmcelhenie@Cambriacsd.org>; James Green <jgreen@Cambriacsd.org>
Subject: RE: Strategic Plan comments

Hi Deryl,

Thank you for your public comment.

Haley

From: Deryl Robinson [REDACTED]
Sent: Wednesday, February 7, 2024 9:35 PM
To: BoardComment <boardcomment@Cambriacsd.org>
Subject: Strategic Plan comments

Dear Board and General Manager,

The Strategic Plan must include a detailed plan of action to 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.

The District needs the significant funds that will be generated by these connection fees.

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.

It is the right thing to do.

Regards,

Deryl Robinson



From: [Christine Heinrichs](#)
To: [BoardComment](#)
Subject: Public Comment
Date: Thursday, February 8, 2024 1:37:50 PM

please include in Written Comment. Thank you.

PUBLIC COMMENT Item 4A

Thank you for bringing this to a public hearing. After hiring another contractor, SWCA, for another \$10,958, this project description fails in several ways to address significant concerns about the project.

Referring to the County's Information Hold on the application submitted in 2020, the first item on the county's list of deficiencies is that it "is unclear whether the impacts to riparian, wetland, and stream areas as designated as Environmentally Sensitive Habitat Area (ESHA) have adequate mitigations." The staff response to comments on exactly that point by both Coastal Commission Senior Environmental Scientist Tom Luster and Senior County Planner Shani Siong is to brush it off as not within the scope. Well, that's what the permitting agencies require. Failing to address ESHA in the Coastal Development Permit application is going to get the same response as the previous, incomplete, permit application.

Although the description and accompanying documents discuss modeling effects of operating the project on habitat, the description has no actual biological studies. They were due a year and a half ago, and have been postponed, as I understand it, because the scope of the project changed. This sounds implausible to me. Could no studies have been done? At any rate, this leaves the CDP application lacking biological studies that would inform the required Adaptive Management Plan.

No actual fish or frogs are included in the document. Considering that habitat for rare and endangered species is one of the significant concerns of the agencies involved, lacking appropriate documentation seems likely to cause another delay in approving the permit application.

This description fails to address the growth-inducing effects of the project. It's probably Zero, since the plant doesn't produce much actual water, and the existing residents and habitat need it. I defer to other commenters, including Crosby Swartz, to document that. But addressing it with vague, imprecise statements such as "...but during future operations, impact assessments would be determined based on research studies, biological assessments, and impacts to other stakeholders to determine whether this mechanism would be adequate to serve existing commitments" fail to account for that. The document should be clear, and I expect the county and the Coastal Commission will require it, to state that the intent is not to produce additional water that could be used to justify adding any new connections. As with the Emergency permit, any water produced is needed to serve existing users.

This project description falls short in many ways from meeting the county's requirements for a Coastal Development Permit, which have been made known to the district for years. General Manager McElhenie and Utilities Manager Green say they have worked with county and Coastal Commission staff on this project description and application. These gaps suggest not

closely enough.

I can't predict whether the county will approve the application based on this. That decision is out of my hands. But this description falls short of what the county has required in the past, and what the Coastal Commission will expect to see when a permit, if it is approved, is appealed.

If the district wanted to complete this permit application, ten years is more than enough time to do so. I ask the board to stop spending a million dollars a year on a project it has no intention of getting a permit to operate. Please mothball the plant and allow Cambria to apply that money to other projects the district needs. Thank you.

--

Christine Heinrichs

From: [Bob Fountain](#)
To: [BoardComment](#)
Subject: CCSD Public Reply to 2/8/2024 #4A
Date: Thursday, February 8, 2024 1:04:05 PM

**Note to Secretary: please read this public comment and submit it to the documents.
Thank you.**

Honorable Directors,
My name is Bob Fountain, and I am a 17 year Cambria resident.

Regarding the CCSD Staff Draft Projection Description submitted today, I am recommending that the Board reject this draft project description, and direct the staff to follow the Board's direction.

I am concerned that staff and management are disregarding the direction given by the Board to them back in April and July of 2023 to modify the project description to only Phase I pertaining to providing water from the WRF for existing customers during emergency drought situations.

The staff continues to include in this draft additional phases for addressing the brine waste with a potential but not verified approach, zero liquid discharge, and an additional phase allowing for growth. A consultant for the Board in 2019 advised them that a regular permit had a higher level of success if focused solely on the original purpose in Phase I, existing customers during drought conditions.

Despite this, the staff and management continues to submit to the Board these additional phases in the project description. I believe that the Board needs to make it crystal clear to CCSD staff and management that they are to follow the Board's direction, and if that is not done, then an appropriate rebuke to those responsible is in order.

Respectively,
Bob Fountain

February 8, 2024

TO: Cambria Community Services District
RE: Public Comment, Agenda Item 4.A

FROM: Jim Townsend

I have reviewed the draft project description for the WRF to be considered by the Board on February 8th. I'll admit to being a bit surprised and concerned that, in spite of clear direction from the Board of Directors, specifically the resolution passed in April 2023 and rejection in July of 2023 of the proposed "Three Phase" approach, staff and their consultants have once again delivered a proposal that goes way beyond "drought protection for existing users."

My concerns are primarily with the "Summary Project Description," on Page 2, The "Project Component" matrix on page 10, and the "Water Reclamation Facility Purpose" on pages 18 and 19. In all three sections, the sentence, "These assessments will determine whether the WRF is sufficient to fulfill existing commitments" should be deleted. This sentence is "Phase 3" of July project description that was rejected by the Board. What qualifies as an "existing commitment" anyway? Is the water wait list an existing commitment? If so, is funding the associated Buildout Reduction Plan also an "existing commitment?" What about the lot owners who have technically "legal" lots w/o utility service? With this language, a future Board could consider a multitude of new users to be existing commitments.

The last sentence on page 18 of the draft reads, "The WRF is designed to provide a reliable water supply to the CCSD's service connections." Given that the facility was actually designed to provide "drought protection for existing users," that sentence should be modified or deleted.

I also suggest that "cost" be inserted as an impact on stakeholders to be evaluated. It's not fair to existing users to pay dramatically higher water and sewer rates to bail out speculative lot purchasers. Beyond the unknown, but likely high operational costs of the WRF, including the cost of brine disposal, the "Project Component" matrix shows, on page 11, an increase from two to six on-site employees. That's a big increase!

I don't know who is giving advice to whoever drafts these documents, maybe staff or consultants, maybe legal counsel, maybe Cambrians for Water, UNLOK or UNCLOG. But given that it's been nearly ten years and millions spent with no real progress, maybe it's time to start listening to the ratepayers instead and deliver the drought protection for existing users promised back in 2014.