

From: [REDACTED] Christine Heinrichs
To: [BoardComment](#)
Subject: Public comment
Date: Thursday, June 17, 2021 12:38:10 PM

Hello, Ossana — Please read for me at Public comment and include in the Minutes: Thank you.

Item 6 A

Thank you for the opportunity to comment on the Urban Water Management Plan.

The 800-plus pages of this agenda are daunting to the ordinary Cambrian, but they contain reports that document much valuable history. The hydrogeology report on pages 400-502 provides important background on Cambria's water situation. I ask the board again to invite Mr. Yates to give the public a report on his recent studies.

Despite many thoughtful comments at the last meeting, I do not find any modifications made to the UWMP. It contains many misleading statements, depending on low estimates of demand and high estimates of supply that skew it toward allowing Cambria to add new water connections without actually having water to serve them. For example, Table 7-4 posits that the district will have more water available in the fifth year of a multi-year drought than in the first, that somehow more water is available as drought goes on. It also assumes that the EWS/SWF/WRF will have a CDP to allow it to operate, that it will produce 250 Acre Feet of water and that all that water will be available as water supply. This is the definition of Paper Water.

That it will get a permit is unlikely, operating the plant that much is not feasible, due to the amount of brine waste it will produce, and even if both of those were true, at best only 60 percent of the water produced would be available for pumping.

Many of Greenspace's questions on page 292, dated October 29, 2015 remain unanswered, such as how much water the EWS/SWF/WRF can produce. The district has been unable to provide a single document in response to the county's 9-page Information Hold on the sketchy Coastal Development Permit application filed almost a year ago. Relying on getting a permit to operate the plant to meet water needs is a fantasy.

Start today: the district has spent millions seeking additional water, but has come up dry. Commit today to a permanent moratorium on new water connections.

Sent from my iPad

From: ██████████ Crosby Swartz
To: [BoardComment](#); [Cindy Steidel](#); [Donn ██████████](#); [Harry Farmer](#); [Karen Dean](#); [Tom Gray](#); [John F. Weigold IV](#); [Ray Dienzo](#)
Subject: Public Comment on UWMP/WSCP 6-17-21 Agenda Item 6.A.
Date: Wednesday, June 16, 2021 6:22:00 PM

- We have reviewed the UWMP and WSCP and have found consistent underestimation of future water demands and overestimation of future water supplies. As a result, the UWMP conclusion that the CCSD has supply capabilities sufficient to meet expected demands through 2045 is not credible.
- Future water demand estimates are low because population growth estimates are low. Using BRP estimates, 884 new residential connections will be added to meet the 4650 connection goal. The population growth number used by the UWMP is 868 or 0.98 persons per new household. Seems very low.
- Future water demand estimates are low because the UWMP does not account for increased occupancy rates from second home owners retiring and becoming full time residents, people moving from large metro areas to small communities like Cambria, people working from home and multiple people sharing a house to reduce costs.
- Future water demand estimates are low because the plumbing fixture water savings used in the UWMP are annual totals. Only water savings from the 6 month dry season actually reduce water demand. Water "saved" during the 6 month wet season drains down into the ocean.
- Future water supply estimates are high because the UWMP assumes that 250 AFY from the WRF is available for distribution to customers. The UWMP states that only 60 percent (150 AFY) of the re-injected water is recovered by the drinking water wells.
- Future water supply estimates are high because the WRF may not be able to supply 250 AFY to the injection well. To avoid drawing salt water into the aquifer, the WRF input supply water must be reduced to 275 gpm. This is the average flow rate of treated water pumped to the percolation pond from the WWTP. The amount of purified water supplied to the injection well is 120 AFY, not 250 AFY as claimed.
- Future water supply estimates are high because the UWMP uses an average normal year supply of 725 AFY. Annual supply numbers cover up the story of water shortages at the end of each 6 month dry season.
- The supply and demand estimates in Tables 7-2, 7-3 and 7-4 must be adjusted to show realistic population growth, plumbing fixture water savings, usable WRF water supply and base year water supply values.
- The UWMP conclusion that the CCSD has supply capabilities sufficient to meet expected demands through 2045 must be based on sound information and analysis to avoid another water shortage emergency in the future.
- The Water Shortage Contingency Plan omits the most important shortage indicator for determining Stages of Drought. On each well level reading date, the acre-feet of water remaining in the San Simeon Creek aquifer must be determined and compared with the acre-feet of water needed to supply customers to the end of the dry season. If the remaining water is less than what is needed, Stage 5 or 6 conservation measures and WRF operation is required.

Tina Dickason
Cambria, CA

June 25, 2021

Comments on Cambria Community Services District's 2020 Urban Water Management Plan

The District, while alluding in the UWMP that it **could** provide 250 acre-feet of potable water from the thrice-named facility (EWS, SWF and, WRF), has never proven that it is actually capable of providing 250 acre-feet within a 6 month period. In a May 2018 audit, conducted by the state Department of Finance, the District was reminded that they had not fulfilled their projected claim of producing 240-250 acre-feet within a 6-month period. (see attached under Finding 2, page 4)

When I contacted the Department of Drinking Water (DDW) after the tracer tests were conducted in 2014 and 2015, I was informed that the product water generated from the tracer tests amounted to approx. 50%. How much pumping will be required to produce 250 acre-feet of product water without causing potential harm to the aquifer?

In the UWMP, the District claims that under a "normal" year it **expects** the WRF to provide 21 acre-feet. I would ask what is actually considered "normal" in Cambria, with the serious issues of drought that we are being reminded of almost on a daily basis from news sources. We *are* currently in another serious drought. The Willow Creek fire in the Big Sur area--not too far from Cambria, is being fought as I write. 550 firefighters are attempting to contain it. Surely, as this and other fires rage in the state with more to come, the District should be paying serious attention to fire--it is nothing new to a town that is heavily forested, prone to extreme drought and with little water.

The District claims it **may** rely on the WRF for 250 afy if conservation is not required. This raises huge concerns, as it clearly will not be used only for the dry season, and could have serious implications with water reliability.

The words (referenced in bold above and found in the CCSD's UWMP), "expects," "could," and "may," do not guarantee anything. The report should be responding to the DWR's question of a supply of water the District **CAN** supply to its customers. The District has failed to answer that question in a reliable manner.

The District needs to be taking climate change far more seriously. Recent temperatures reached 109 degrees in San Luis Obispo, and Morro Bay, 102 degrees. Weather patterns should be raising serious concerns for Cambria, as well as our entire state. We have witnessed for the last several months, highly unusual weather for this area. The District's UWMP, in considering an **increase in precipitation for Cambria**, appears highly questionable and seriously misleading. (bold enhanced)
<https://www.wunderground.com/history/daily/us/ca/san-luis-obispo/yesterday>

The statement below from the UWMP, caught my attention and certainly raises questions:

*"For the drought risk assessment that assessed surpluses or shortfalls over a five-year drought extending from today through 2025, WSCP Use Reductions or water conservation measure are required to reduce demand **because it is assumed that a regular Coastal Development Permit WRF will not (sic) obtained till 2025.**"* (bold enhanced)

Why is the CDP going to take another 4 or 5 years? This plant was built in 2014 with a County Emergency Permit. Cambrians have been told for years that a CDP was forthcoming years ago, yet here we are in 2021, now being told the CCSD will not have a CDP until 2025. The community needs to know why an unexplained delay of several more years in obtaining a CDP, is being proposed in the UWMP. (My comments were addressed by Ray Dienzo at the June 17, Board meeting, and were edited by him, saying that he "misspoke or miswrote," so I would recognize his edits as corrections to when the CDP is actually anticipated).

I find this UWMP to be unacceptable on many levels, and I would hope the Board has given this document their utmost attention and come to the conclusion that there are many areas that require definitive answers before approving it.

(It is noted that since my comments of 6-17-21, the Board approved the UWMP on June 17).

If the District intended to confuse readers with their UWMP document, I would say that have succeeded in doing so. At least some clarifications were made at the June 17 Board meeting, but I remain uncomfortable with many of the predictions and assumptions that have been made in the document.

Respectfully,
Tina Dickason
Cambria resident