

From: [Douglas Bell](#)
To: [BoardComment](#)
Subject: Weed Trimming on Large Vacant Lots
Date: Saturday, June 15, 2024 6:55:11 PM

While individual home owners are required to maintain a defensible space around their homes it seems that large lots with no homes often have large amounts of tall weeds that are immediately adjacent to streets. For example, Cambria Pines Rd. and Catherine Dr. have several lots with tall weeds that present a significant fire danger. There is a very large parcel that lies in between the two streets that is also unmaintained. If a cigarette or spark were to ignite these weeds, fire could spread through the forest and gain speed due to updrafts on hillsides. At the very least it seems that in addition to any concerns about defensible space around structures, weeds should be cleared at least 25 feet from any roadway. Is there any plan to address the fire danger on large parcels?

Doug Bell
6435 Buckley Dr
Cambria, CA

From: [Jim Townsend](#)
To: [BoardComment](#)
Subject: June 20th Board Meeting, Agenda Item 7A
Date: Thursday, June 20, 2024 7:10:14 AM

President Gray and members of the Board:

Thank you for the opportunity to share these comments on the revised project description for the Water Reclamation Facility. I fully support the language in the document limiting the use of the WRF to support existing users in times of drought. Removing the water wait list parcels from potential future service by the WRF will go a long way towards finally securing a regular permit to operate the facility as it was originally intended.

There do remain many unresolved issues, including operational costs, brine disposal, impacts to the environment and impacts on adjacent landowners with long established water rights.

But refocusing the project description to providing drought protection for existing users is positive step forward.

Thank you for your service.

Jim Townsend
Cambria, CA

Sent from my iPad

From: [Elizabeth Bettenhausen](#)
To: [BoardComment](#)
Subject: re: Agenda items for 20 June 2024
Date: Thursday, June 20, 2024 11:17:56 AM

CCSD Board of Directors:

1. Please respond to my letter to you of 23 May 2024 and the accompanying report of water use. The unaccounted water for March and April 2024 is 16 Acre Feet or 21.52% of the water pumped, twice as much as the CCSD goal of 10%. The amount for Jan.-Feb. was 19.51%, again nearly twice as much as the CCSD goal.

Why is this much water pumped and not paid for? Is any action forthcoming to change the goal of 10%?

2. Re: 7.A

The Draft of the Project Description for the Coastal Development Permit for WRF is incomplete. A major flaw rests in the absence of any data on the Zero Waste Discharge facility during its pilot run, which has not yet been started. It is projected for October 2024, four months from now. A Draft for the CDP must not be submitted before the pilot run is completed and analysed.

If the pilot run turns out negative, the hauling by truck of the waste is speculative at best. The Draft reads: "Until the ZLD pilot program is completed, it is unknown how much concentrate will be produced during normal and dry year operations" (p. 17--page numbers are for Draft, not Agenda). If such an important aspect of the ZLD is unknown, that is another reason for declaring this draft premature.

The Draft is also vague in defining several phrases having to do with the purpose of the plant. For example, on p. 9 the third "component" reads, "Operation of the WRF up to 24 hours a day 5 days a week for 7 months (maximum) during normal and dry precipitation years." The Staff Discussion of the Draft reads: "The WRF should be operated proactively, yet conservatively, to prevent water shortages from escalating to emergency levels" (p. 110). What does this mean? The discussion under Hours of

Operation on p. 19 does not answer my question.

In the chart of changes we read for the Emergency permit (p. 12), under Connections Served: "Existing authorised water connections." For Regular Coastal Development Permit we read: "The WRF would initially serve to satisfy existing connections. As part of future operations, evaluations will be conducted through research studies, biological assessments, and consideration of impacts on other stakeholders. These assessments will determine whether the WRF is sufficient to fulfill existing commitments." If the WRF "initially" serves "existing connections," what environmental and economic consequences lie in what pertains to "other stakeholders"? Such a question is essential but not addressed in this draft.

The delivery of lagoon water raises similar questions. For example, it reads, "The quantity of lagoon water delivered depends on the results of monitoring and surveys performed under the Adaptive Management Plan (AMP) but is anticipated to be approximately 100 GPM when the creek is dry" (p. 17). The whole description on the rerouting of the pipe for delivery is sadly speculative.

For these and other reasons, I urge you to wait until at least November before deciding that you finally have a document that merits forwarding to San Luis Obispo County's Office of Planning and Building for their consideration.

I request that my letter of 23 May 2024 and the current letter be included in the official record of this meeting.

Thank you for your careful attention to these matters.

Elizabeth Bettenhausen
Cambria, CA, since 2002
elizabethbettenhausen@gmail.com

From: [Elizabeth Bettenhausen](#)
To: [REDACTED]
Cc: [Matthew McElhenie](#); [James Green](#); [BoardComment](#); [Denise Fritz](#)
Subject: March-April Water Use report
Date: Thursday, May 23, 2024 10:24:07 AM
Attachments: [ccsd half-year 2024 Mar-April.doc](#)

CCSD Board of Directors:

Please look carefully at this report for March and April of this year. According to my calculation, 21.51% of the diverted water was not paid for. This is very high. Perhaps I erred in my math!
<https://www.cambriacsd.org/files/b493fb819/March-April+2024.pdf>

Thank you for your attention to this bimonthly report and analysis.

Elizabeth

Water usage and production in Cambria

I created this Table and update it bimonthly to

- report the water used by categories of customers: residential, commercial, vacation rentals, internal,
- discover any trends in water conservation or increasing use, and
- push for wider posting on the CCSD website of water usage data. Five years ago, I succeeded in getting the CCSD to post the bimonthly Billing Summary on the CCSD web site.¹ However, many people throw up their hands when seeing the Summary.

The CCSD should post on its website bimonthly updates on water usage and conservation in Cambria. Monthly updates on how much water is drawn from the wells for our use is helpful. But how much of that water is used by resident customers, by businesses, and by guests of Cambria bimonthly when billed?

E
May you find this Table and the summary preceding it helpful.

Please send comments or questions to me at the email address below

¹ Usage numbers are from CCSD bi-monthly billing reports that I obtained only through Public Records Requests until Sept. 2016. Thereafter, Billing Summaries have been posted on the CCSD web site.

Condor, probably Jade,
sighted ca. 12 miles on the San Simeon Creek Road,
12 May 2024



- In 2013 **residents** used an average of 67 gallons per person daily (gpcd).
 - In 2014 they used an average of 35 gpcd
 - In 2015 they used an average of 34 gpcd
 - In 2016 they used an average of 38 gpcd
 - In 2017 they used an average of 43 gpcd
 - In 2018 they used an average of 46 gpcd
 - In 2019 they used an average of 45 gpcd
 - In 2020 they used an average of 49.46 gpcd 2020 is the first year of the COVID-19 pandemic.
 - In 2021 they used an average of 48.45 gpcd (pop. 5,678 in 2020 U.S. Census, made available in 2021)
 - In 2022 they used an average of 42.62 gpcd
 - In 2023 they used an average of 43.26 gpcd
- In 2013 **commercial users** of Cambria (including vacation rentals) used 29% of the water used in Cambria.
 - In 2014 they used 36% of the total metered water from CCSD.
 - In 2015 they used 33%.
 - In 2016 they used 33%.
 - In 2017 they used 33%.
 - In 2018 they used 32%.
 - In 2019 they used 34%.
 - In 2020 they used 27.98%
 - In 2021 they used 33.02%
 - In 2022 they used 36.79% -- the highest percentage over the past 10 years.
 - In 2023 they used 35.88%.

TOTAL metered use adds commercial, residential, and CCSD use. Divided by the population (6,032) and 365 days, this is

- ✦ 98 gpcd on average in 2013
- ✦ 58 gpcd on average in 2014
- ✦ 59 gpcd on average in 2015
- ✦ 60 gpcd on average in 2016
- ✦ 66 gpcd on average in 2017
- ✦ 69 gpcd on average in 2018
- ✦ 71 gpcd on average in 2019
- ✦ 70.08 gpcd on average in 2020
- ✦ 84.6 gpcd on average in 2021 (using 2020 Census population of 5,678)
- ✦ 68.22 gpcd on average in 2022
- ✦ 84.27 gpcd on average in 2023

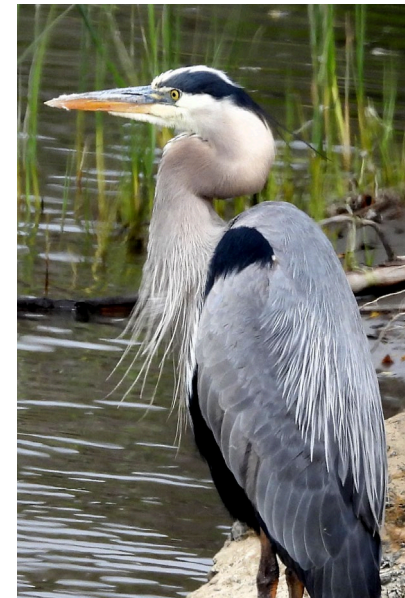
	Residential Use		Commercial Use		Vacation Rental Use		C + VR*	Internal Use		Total Usage		Diverted	Unaccounted	
	ccf	% of 2 months	ccf	% of 2 months	ccf	% of 2 months	% of 2 months	ccf	% of 2 months	ccf	Acre Feet	Acre Feet	Acre Feet	%
2024														
J-Feb.	16,758	68.66%	5,818	23.86%	1,746	7.15%	30.82%	128	0.52%	24,409	56.07	70.04	13.67	19.52%
M-A	16,049	63.34%	7,412	29.25%	1,717	6.78%	36.03%	161+	0.64	25,339	58.67	74.75	16.08	21.51 %
M-J														
J-Aug.														
S-O														
N-D														
Total														
Avg.%														
Gpcd														

Total Usage bimonthly includes all uses except the column labeled C + VR.

ccf = 100 cubic feet = 1 billing unit = 748 gallons.

*This column determines total commercial percentage of usage bimonthly.

+No charge was made for 75 units of water in Internal water use. No explanation is given.



Great Blue Heron, 20 May 2024, Santa Rosa Creek

	Residential Use		Commercial Use		Vacation Rental Use		C + VR*	Internal Use		Total Usage		Diverted	Unaccounted	
	ccf	% of 2 months	ccf	% of 2 months	ccf	% of 2 months	% of 2 months	ccf	% of 2 months	ccf	Acre Feet	Acre Feet	Acre Feet	%
2023														
J-Feb.	17,181	65.22%	7,211	27.37%	1801	6.84%	34.32%	152	0.58%	26,345	60.48	68.96	8.48	12.39%
M-A	17,211	63.38%	7,882	29.03%	1,883	6.93%	35.96%	179	0.66%	27,155	62.34	72.88	10.54	14.46%
M-J	20,638	62.07%	10,050	30.23%	2,358	7.09%	37.33%	200	0.6%	33,241	76.31	84.87	8.56	10.09%
J-Aug.	23,812	63.88%	10,233	27.45%	3,013	8.08%	33.57%	217	0.58%	37,275	85.57	99.62	14.05	14.10%
S-O	21,441	63.91%	9,706	28.93%	2,218	6.61%	35.54%	188	0.56%	33,551	77.02	91.90	14.88	16.19%
N-D	19,573	60.99%	10,242	31.92%	2,117	6.60%	38.54%	155	0.48%	32,087	73.66	87.40	13.74	15.72%
Total	119,856													
Avg.%		63.24%		29.16%		7.03%	35.88%							
Gpcd	43.26 gpcd									68.45 gpcd	84.27 gpcd			

Total Usage bimonthly includes all uses except the column labeled C + VR.

*This column determines total commercial percentage of usage bimonthly.

ccf = 100 cubic feet = 1 billing unit = 748 gallons.



	Residential Use		Commercial Use		Vacation Rental Use		C + VR	Internal Use		Total Usage		Diverted	Unaccounted	
	ccf	% of 2 months	ccf	% of 2 months	ccf	% of 2 months	% of 2 months	ccf	% of 2 months	ccf	Acre Feet	Acre Feet	Acre Feet	%
2022														
J-Feb.	18,305	65.43%	7,527	26.90%	1,993	7.12%	34.03%	152	0.54%	27,977	64.22	73.27	9.05	12.35%
M-A	19,542	61.61%	9,436	29.74%	2,497	7.87%	37.61%	250	0.79%	31,731	72.84	80.73	7.89	9.77%
M-J	20,202	61.69%	9,906	30.16%	2,444	7.46%	37.62%	224	0.68%	32,746	75.17	87.49	12.32	14.08%
J-Aug.	22,591	61.79%	10,720	29.32%	2,852	7.8 %	37.12%	396	1.08%	36,559	83.92	96.39	12.67	13.15%
S-O	20,019	61.29%	10,046	30.8 %	2,384	7.3 %	38.1%	213	0.65%	32,662	74.98	85.72	10.74	12.53%
N-D	17,427	63.73%	7,819	28.60%	1,948	7.12%	35.72%	153	0.56%	27,347	62.78	75.48	12.7	16.83%
Total	118,086		55,424		14,118			1,388	0.73%	189,022		499.09		
Avg.%		62.47%		29.32%		7.47	36.79%							
Gpcd	42.62 gpcd									68.22 gpcd		78.47 gpcd		

Total Usage bimonthly includes all uses except the column labeled **C + VR**. **This column determines total commercial percentage of usage bimonthly.**

ccf = 100 cubic feet = 1 billing unit = 748 gallons. **Avg. %** means the average percentage of total usage for the entire year.

Gallons per capita daily used by population of 5,678 in 2022 in columns listed. Columns list cubic or acre feet, but Gpcd gives usage in gallons.

Diversion numbers are from CCSD Water Diversion reports on CCSD web site. The total in this Table adds San Simeon and Santa Rosa, combines two months for the bimonthly format, and corrects addition mistakes in Reports over the years. *Today the page lists 1.64 Acre Feet withdrawn from San Simeon creek in March 2022. What does this mean?*
<https://www.cambriacsd.org/files/153f4a7fa/2022+MASTER+PRODUCTION.pdf>

Please compare the “Diverted but unaccounted” column data with the CCSD Water Loss report

:<https://www.cambriacsd.org/files/bc41ededf/2020+-+Water+Loss+Calculations.pdf>.

	Residential Use		Commercial Use		Vacation Rental Use		C + VR	Internal Use		Total Usage		Produced	Unaccounted	
	cubic feet	% of 2 months	cubic feet	% of 2 months	cubic feet	% of 2 months	% of 2 months	cubic feet	% of 2 months	Cubic feet	Acre Feet	Acre Feet	Acre Feet	%
2021														
J-Feb.	21,601	68.73%	7,411	23.58%	1,347	4.29%	27.87%	1,069	3.40%	31,428	72.14	79.61	7.47	9.38%
M-A	22,228	65.39%	9,586	28.20%	1,491	4.39%	32.59%	688	2.025	33,993	78.03	90.97	12.94	14.22%
M-J	25,819	65.48%	11,369	28.83%	1,848	4.69%	33.52%	229	0.58%	39,427	90.51	99.79	9.22	9.24%
J-Aug.	24,899	63.29%	12,122	30.82%	2,078	5.28%	36.1 %	238	0.61%	39,337	90.3	101.18	10.88	10.75%
S-O	20,509	64.34%	9,568	30.02%	1,616	5.07%	35.09%	183	0.57%	31,876	73.17	87.67	14.5	16.54%
N-D	19,184	64.33%	8,071	27.67	1,428	4.79	31.85%	1,136	3.81%	29,819	68.345	78.84	9.89	12.62%
Total	134,240		58,127		9,808			3,543		205,718	472.5	538.06	64.9	
Avg.%		65.25%		28.26%		4.77%	33.02%		1.72%	--	--	--	--	12.18%
Gpcd	48.45 gpcd									74.25 gpcd			84.6 gpcd	
2020*														
J-F	19,923	67.21%	8,360	28.20%	1,185	4.0 %	32.20%	173	0.58%	29,641	68.04	78.45	10.41	13.23%
M-A	21,256	77.23%	5,069	18.42%	1,047	3.8%	22.22%	150	0.55%	27,522	63.18	72.59	9.41	12.96%
M-J	26,853	73.48%	7,694	21.05%	1,610	4.4%	25.46%	389	1.06%	36,546	83.89	92.57	8.68	9.38%
J-A	28,113	70.24%	9,040	22.58%	2,243	5.6%	28.19%	625	1.56%	40,021	91.87	106.37	14.5	13.63%
S-O	25,342	67.09%	9,921	26.26%	1,745	4.62%	30.88%	765	2.03%	37,773	86.71	100.61	13.9	13.82%
N-D	24,081	69.28%	8,199	23.59%	1,603	4.61%	28.20%	875	2.34	34,758	79.79	87.24	7.45	8.53%
Total	145,568		48,283		9,433			2,977		206,261		537.83	64.35	
Avg.%		70.57%		23.41%		4.57%	27.98%		1.44%					11.96%
Gpcd	49.46 gpcd									70.08 gpcd			79.6 gpcd	

Total Usage includes Commercial and Vacation Rental separately only. **C + VR** determine total commercial percentage of usage bimonthly.

Cubic foot = 1 billing unit = 748 gallons. **Avg. %** means the average percentage of total usage for the entire year.

Gallons per capita daily used by population of 6,032 in 2020 and 5,678 in 2021 in columns listed. Columns list cubic or acre feet, but Gpcd gives usage in gallons.

*The COVID-19 pandemic began globally in 2020. In Cambria, residential and commercial water usage was affected.

Production numbers are from CCSD Water Diversion reports on CCSD web site. The total in this Table adds San Simeon and Santa Rosa, combines two months for the bimonthly format, and corrects addition mistakes in Reports. <https://www.cambriacsd.org/files/4e8039317/2021+MASTER+PRODUCTION.pdf>

Please compare the “Produced but unaccounted” column data with the CCSD Water Loss report (<https://www.cambriacsd.org/files/bc41ededf/2020+-+Water+Loss+Calculations.pdf>).

	Residential Use		Commercial Use		Vacation Rental Use		C + VR	Internal Use		Total Usage		Production	Produced but unaccounted	
	cubic feet	% of 2 months	cubic feet	% of 2 months	cubic feet	% of 2 months	% of 2 months	cubic feet	% of 2 months	Cubic feet	Acre Feet	Acre Feet	Acre Feet	%
2019														
J-F	19,069	66.54%	8,062	28.13%	1,203	4.2%	32.33%	323	1.13%	28,657	65.78	71.13	5.35	7.5%
M-A	18,076	64.7 %	8,385	30.01%	1,093	3.91%	33.92%	385	1.38%	27,939	64.13	80.74	16.61	20.57%
M-J	25,599	65.54%	11,0.67	29.11%	1,602	4.10%	33.21%	490	1.25%	39,061	89.67	89.55	?	? *
J-Aug	24,456	62.68%	11,592	29.71%	1,956	5.02%	34.72%	1,012	2.59%	39,016	89.56	104.54	14.98	14.33%
Sept-O	24,698	64.92%	10,452	27.43%	1,571	4.12%	31.56%	1,380	3.62%	38,101	87.46	98.75	11.29	11.42%
N - D	21,447	61.26%	11,592	33.11%	1,295	3.7 %	36.81%	674	1.93%	35,008	80.36	85.68	5.32	6.2%
Total	133,345		61,150		8,720			4,264		207,782		530.39		
Avg.%		64.18%		29.43%		4.2%	33.63%		2.05%					10.07%
Gpcd	45.27gpcd									70.59gpcd		78.5gpcd		
2018														
J-F	21,327	67.33%	8,399	26.52%	1,533	4.84%	31.36%	404	1.28%	31,673	72.71	83.66	10.95	13.09%
M-A	17,879	66.00%	7,808	28.83%	1,248	4.61	33.43%	151	0.56	27,086	62.18	77.09	14.91	19.34%
M-J	23,890	66.72%	9,783	27.32%	1,650	4.61	31.93%	485	1.35	35,808	82.2	90.85	8.65	9.52%
J-Aug	26,801	62.96%	12,777	30.01%	2,234	5.25	35.26%	757	1.78	42,569	97.72	108.31	10.59	9.78%
Sept-O	23,894	66.42%	9,721	27.02%	1,631	4.53	31.56%	727	2.02	35,973	82.58	91.64	9.06	9.9%
N - D	20,807	67.21%	7,831	25.3 %	1,424	4.6%	29.9 %	895	2.89	30,957	71.06	84.37	13.31	15.76%
Total	134,598		56,319		9,720			3419		204,056		535.92		
Avg.%		65.96%		27.6%			32.36%		1.68%					12.6%
Gpcd	45.73 gpcd									69.33gpcd		79.32 gpcd		

*The CCSD often posts daily water production by month, bimonthly billing summary, and bimonthly water loss information on the CCSD web site. The CCSD includes metered backwash and estimated Fire Dept. use (not listed in the internal [CCSD] accounts in the bimonthly billing summary). Metered usage billed through deletion is not reported in the bimonthly billing summary posted on the web site. www.cambriacsd.org. Billing Summary errors in usage reports are not corrected for public viewing. Thus, the usage is larger than the production in **May-June 2019**.

	Residential Use		Commercial Use		Vacation Rental Use		C + VR*	Internal Use		Total Usage *		Production	Produced but unaccounted		
	cubic feet	% of 2 months	cubic feet	% of 2 months	cubic feet	% of 2 months	% of 2 months	cubic feet	% of 2 months	Cubic feet	Acre Feet	Acre Feet	Acre Feet	%	
2017															
J-F	16,946	63.44	8,202	30.71	1,236	4.63	35.33	327	1.22	26,711	61.32	70.75	9.43	13.33%	
M-A	17,275	65.70	7,579	28.83	1,160	4.41	33.24	278	1.06	26,292	60.35	102.06	41.71	40.87%	
M-J	22,124	65.61	9,393	27.9	1,699	5.04	32.9	507	1.5	33,723<<	77.41	127.11	49.7	39.10%	
J-Aug	25,190	62.25	11,180	27.63	2,326	5.75	33.38	1,768	4.37	40,464	92.89	108.07	15.18	14.05%	
Sept-O	23,427	63.94	9,169	25.02	1,878	5.13	30.15	2,165	5.91	36,639	84.11	83.22**	-0.89**	n.a.**	
N - D	20,570	66.99	8,154	26.56	1,524	4.96	31.52	457	1.49	30,705	70.48	83.26**	12.78	15.35%	
Total	125,532		53,677		9,823			5,502		194,534	446.56	574.47	127.91		
Avg.%		64.53%		27.59%		5.05%	32.59%		2.83%					22.27%	
Gpcd	42.65 gpcd									66.09 gpcd		85.02 gpcd			

<<This total usage number is taken from the Billing Summary posted on the CCSD website under Finance (also used in the Finance Manager’s report to the Board of Directors on 27 July 2017, Agenda pp. 11ff.). It is less than the usage number in the General Manager’s report to the Board of Directors on 27 July 2017, Agenda p. 5. Therefore, the unaccounted total here is nearly 1 Acre Foot higher.

* **Total Usage column** includes Commercial and Vacation Rental separately only. The merged number column was used only to determine total commercial percentage of total use.

**In Sept./Oct. of 2017, more water was used than produced. CCSD staff presented the 2016 CALENDAR YEAR WATER LOSS AUDIT to the CCSD Board of Directors on 16 Nov 2017. It included this statement:

“Turbidity meter, chlorine analyzer, and backwash meter maintenance at Well SS3 on 10/ 25/ 2017 caused production meter inaccuracies. Staff stopped running Well SS3 on 11/ 13/ 2017 . This is scheduled to be fixed next week.”

<http://www.cambriacsd.org/assets/Water%20Loss%20Audit%20Presentation%20Attachment%202.pdf>

In the General Manager’s Report to the CCSD Board of directors on 18 Jan 2018 the Water Supervisor wrote, “On December 4th, 2017, Gold Coast Environmental was able to find and diagnose the problem with the Well SS-3 flow meter, which had been errantly reading too low. Gold Coast Environmental was able to calibrate the meter, and it has since been working correctly.” **or 20 days CCSD was getting an erroneous reading of water production, understating the amount actually produced. This could mean that the production numbers for Nov. also show less than was actually produced.**

	Residential Use		Commercial Use		Vacation Rental Use		C + VR	Internal Use		Total Usage		Produc-tion	Produced but unaccounted	
	cubic feet	% of 2 month	cubic feet	% of 2 month	cubic feet	% of 2 month	% of 2 month	cubic feet	% of 2 month	Cubic feet	Acre Feet	Acre Feet	Acre Feet	% of total
2016														
J-F	16,228	65.00	7,110	28.48	1,262	5.05	33.53	368	1.47	24,968	57.31	71.16	13.85	19.46
M-A	17,652	63.95	8,219	29.78	1,313	4.76	34.53	419	1.52	27,603	63.36	74.02	10.66	14.40
M-J	20,409	59.95	9,385	27.57	1,706	5.01	32.58	2,543	7.47	34,043	78.15	84.80	6.65	7.84
J-Aug	21,770	58.08	10,302	27.48	2,207	5.89	33.37	3,205	8.55	37,484	86.05	98.65	12.6	12.77
Sept-O	18,743	59.99	8,673	27.76	1,541	4.93	32.27	2,285	7.3	31,242	71.72	80.13	8.41	10.5
N - D	<u>18,276</u>	<u>64.74</u>	<u>8,244</u>	<u>29.20</u>	<u>1,312</u>	<u>4.65</u>	<u>33.85</u>	<u>398</u>	<u>1.41</u>	28,230	<u>64.80</u>	<u>77.68</u>	<u>12.84</u>	<u>16.53</u>
Total	113,078		51,933		9,341			9,218		183,570	421.4	486.44	65.05	
Avg.%		61.6%		28.3%		5.09%	33.38%		5.02%					13.37
Gpcd	38.42gpcd									60.37gpcd		71.99gpcd		

2015														
J-F	15,205	63.44	6,913	28.84	1,233	5.14	33.98	616	2.57	23,967	54.99	66.27	11.28	17.02
M-A	17,316	59.92	8,071	27.93	1,317	4.56	32.49	2,195	7.60	28,899	66.31	76.16	9.85	12.93
M-J	15,831	56.63	8,327	29.79	1,376	4.92	34.71	2,419 [^]	8.65	27,953	64.17	77.82	13.65	17.54
J-Aug	18,024	53.9	9,408	28.13	1,870	5.59	33.73	4,139	12.38	33,441	76.76	89.82	13.06	14.54
S-O	18,161	55.65	8,731	2,676	1,676	5.14	31.89	4,056	12.43	32,633	74.91	84.52	9.61	11.37
N-D	<u>16,945</u>	<u>62.42</u>	<u>7,802</u>	<u>28.74</u>	<u>1,312</u>	<u>4.83</u>	<u>33.57</u>	<u>1,088</u>	<u>4.01</u>	<u>27,147</u>	<u>62.32</u>	<u>72.44</u>	<u>10.12</u>	<u>13.97</u>
Total	101,482		49,252		8,784		*	14,513		174,031	399.5	467.02	67.52	
Avg.%		58.31%		28.30%		5.05%	33.35%		8.33%					14.46
Gpcd	34.48gpcd									59.13gpcd		69.12gpcd		

[^] An Internal Use number was 93,434 units in this bi-monthly report, clearly wrong. I requested the correct number from CCSD on July 22 and 30, 2015, but received no answer. The Internal Use number here is the average of the other bi-monthly use in 2015, and the Total Use includes that.

	Residential Use		Commercial Use		Vacation Rental Use		C + VR	Internal Use		Total Usage		Production	Unaccounted	
	cubic feet	% of 2 months	cubic feet	% of 2 months	cubic feet	% of 2 months	% of 2 months	cubic feet	% of 2 months	cubic feet	Acre Feet	Acre Feet	AF	% of total
2014														
J-F	23,940	65.45	10,002	27.35	2,088	5.71	33.06	546	1.49	36,576	83.92	94.44	10.52	11.14
M-A	15,012	60.25	8,373	33.60	1,288	5.17	38.77	244	0.98	24,917	57.17	69.94	12.77	18.26
M-J	15,420	60.47	8,289	32.51	1,379	5.41	37.92	412	1.62	25,500	58.51	79.29	20.78	26.21
J-A	17,590	55.68	10,106	31.99	2,143	6.78	38.77	1,753	5.55	31,592	73.40	85.92	13.43	15.63
S-O	16,015	55.68	8,486	29.50	1,402	4.87	34.37	2,861	9.95	28,764	66.00	73.40	7.40	10.08
<u>N-D</u>	<u>15,282</u>	<u>64.42</u>	<u>6,623</u>	<u>27.92</u>	<u>1,266</u>	<u>5.34</u>	<u>33.26</u>	<u>552</u>	<u>2.33</u>	<u>23,723</u>	<u>54.43</u>	<u>65.80</u>	<u>11.35</u>	<u>17.28</u>
Total	103,259		51,879		9,566			6,310		171,072	392.52	466.76	76.25	
Avg.%		60.36		30.33		5.59	36.03		3.69					16.34
Gpcd	35.08gpcd									58.12gpcd		69.11gpcd		

2013														
J-F	29,070	71.0	9,540	23.30	1,820	4.45%	27.75	513	1.25%	40,943	93.94	97.95	4.01	4.09
M-A	30,957	70.04	10,881	24.62	1,783	4.03	28.65	580	1.31	44,201	101.42	114.26	12.84	11.24
M-J	38,321	70.74	12,463	23.01	2,417	4.46	27.47	972	1.79	54,173	124.30	142.03	17.73	12.48
J-A	41,744	66.14	15,621	24.75	4,459	7.07	31.82	1,289	2.04	63,113	144.81	154.76	9.95	6.43
S-O	31,166	65.83	12,514	26.43	2,746	5.80	32.23	919	1.94	47,345	108.63	117.75	9.12	7.75
<u>N-D</u>	<u>26,816</u>	<u>69.70</u>	<u>8,948</u>	<u>23.05</u>	<u>2,233</u>	<u>5.75</u>	<u>28.8</u>	<u>830</u>	<u>2.14</u>	<u>38,827</u>	<u>89.09</u>	<u>106.33</u>	<u>17.24</u>	<u>16.21</u>
Total	198,074		69,967		14,858			5,103		288,602	662.19	733.08	70.89	
Avg.%		68.63%		24.24%		5.15%	29.45%		1.77%					9.67
Gpcd	67.29gpcd									98.05gpcd		108.55gpcd		

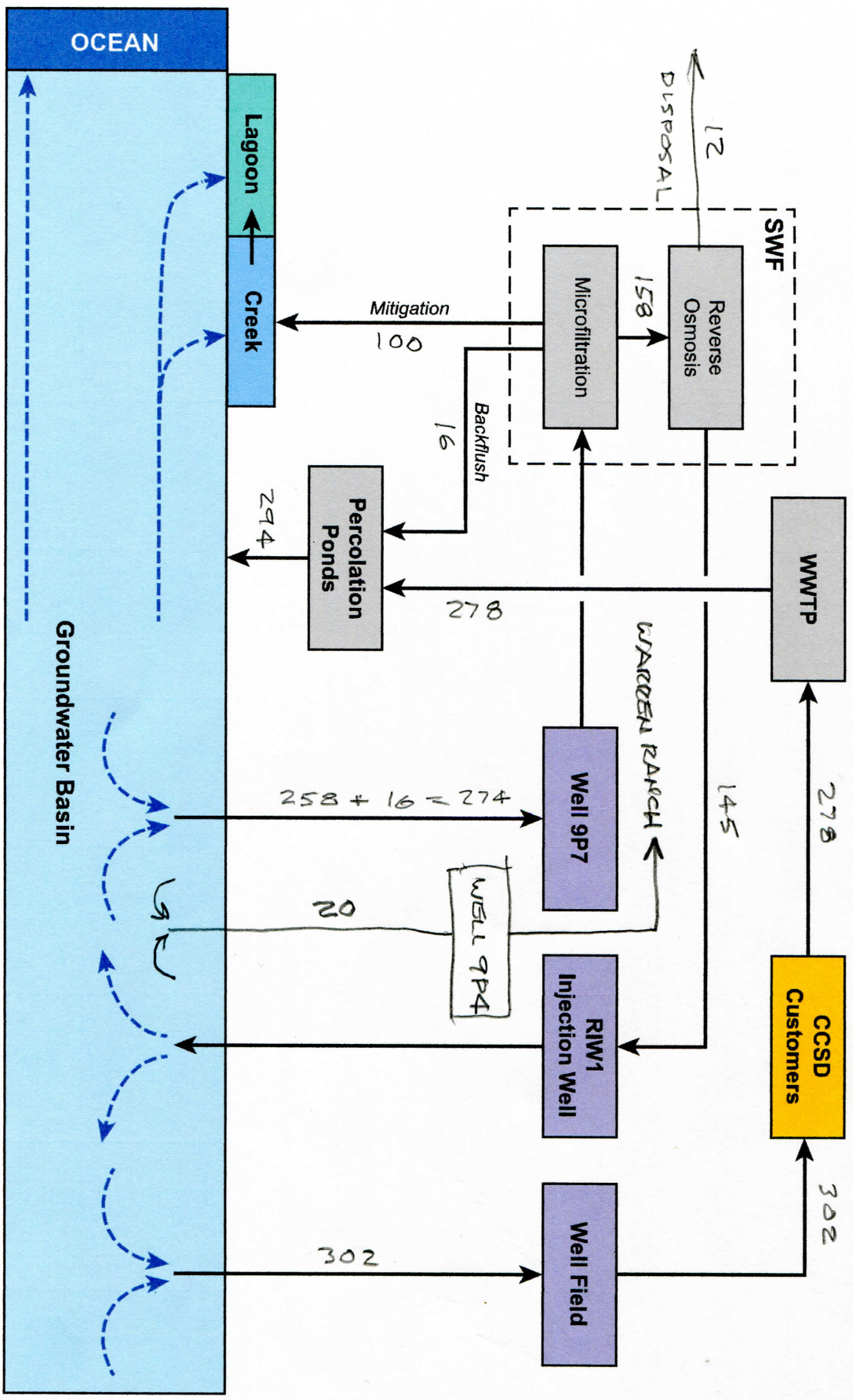
Cubic foot = 1 billing unit = 748 gallons. **Total Usage** includes Commercial and Vacation Rental separately only. **C + VR** determine total commercial percentage of usage bimonthly. **Avg. %** means the average percentage of total usage for the entire year. **Gallons per capita daily** used by population of 6,032 in columns listed. The columns list cubic or acre feet, but gpcd gives usage in gallons.

From: [Crosby Swartz](#)
To: [BoardComment](#); [Tom Gray](#); [Debra Scott](#); [Harry Farmer](#); [Karen Dean](#); [Michael Thomas](#); [Matthew McElhenie](#); [James Green](#)
Subject: Public Comment on 6-20-24 Agenda Item 7.A WRF Permit Application
Date: Thursday, June 20, 2024 12:02:13 PM
Attachments: [WRF Flow Diagram 6-20-24.pdf](#)

The 6-20-24 Draft WRF Project Description states that the facility can produce 425 gallons per minute (GPM) of purified, recycled water to augment the community's potable water supply during dry conditions. We recommend adding the following information to the project description to establish the supply limitations of this project.

1. What is the pumping rate of secondary treated effluent into the percolation pond? (Example, 400,000 GPD equals 278 GPM)
2. What is the pumping rate at the 9P7 WRF supply well? (Example, 258 GPM, to match percolation pond recharge)
3. What is the pumping rate at the 9P4 Warren Ranch well? (Example, 20 GPM 6 month historical average)
4. What is the pumping rate of micro filtered water to maintain lagoon flow? (Example, 100 GPM, varies)
5. What is the pumping rate into the WRF reverse osmosis section? (Example, 94 percent of 278 - 20 - 100 equals 158 GPM)
6. What is the injection rate at the RIW-1 injection well? (Example, 92 percent of 158 equals 145 GPM) (19 acre feet per month)

I have attached a WRF system diagram (from Todd Groundwater) marked up to show water flow rates in gallons per minute, based on 400,000 GPD recharge into the percolation pond. A flow diagram like this added to the project description would help clarify what happens when the WRF is operating.



ESTIMATED FLOWS DURING DROUGHT IN GPM
 9P7 PUMPING BASED ON 278 GPM FROM WWTP
 C. SWARTZ 6-20-24

March 2022
TODD
 GROUNDWATER

Figure 4
 Diagram of SWF and
 Groundwater System

From: [Tina Dickason](#)
To: [Haley Dodson](#)
Subject: Fwd: Item 7A, June 20, 2024 Board Agenda Packet
Date: Thursday, June 20, 2024 12:33:04 PM
Attachments: [Department of Water Resources Proposition 84 San Luis Obispo Flood Control and Water Conservation District May 2018.pdf](#)
[Info Hold 08-14-2020 \(1\).pdf](#)

Hi Haley,

Please include my comments for the Public Record and confirm receipt of.

Thank you,
Tina Dickason

----- Forwarded message -----

From: Tina Dickason [REDACTED]
Date: Thu, Jun 20, 2024 at 12:29 PM
Subject: Item 7A, June 20, 2024 Board Agenda Packet
To: Tom Gray [REDACTED], Debra Scott [REDACTED], Harry Farmer [REDACTED], Karen Dean [REDACTED], Karen Dean [REDACTED], Michael Thomas [REDACTED]
Cc: Haley Dodson [REDACTED]

Haley, Please include these comments for the Public Record for today's meeting, Item 7A. Thank you!

To: Cambria Community Services Board of Directors

Re: Item 7A, June 20 Board Meeting Packet
Meeting Date: June 20, 2024 Subject: Public Hearing to Receive Community Input on the Draft Project Description for the Water Reclamation Facility Coastal Development Permit Application, and Direct Staff to File the Draft Project Description with the County of San Luis Obispo Department of Planning and Building Staff for Final Evaluation, Input and Direction

Dear Cambria CSD Board,

Before you today, and for your approval, is the Draft Project Description for the Water Reclamation Facility (WRF) for submission to the SLO County Planning Department. But what is **not** before you today, is a **completed** application for a Coastal Development Permit (CDP) for the WRF. I offer some limited comments at this time for your consideration and for the public record.

Before I go any further, I was struck by the opening sentence of the agenda item:

"FISCAL IMPACT: There is no fiscal impact associated with this item. Costs for future actions related to this issue are undetermined."

(bold enhanced)

After ratepayers have paid exorbitant amounts of money for the thrice-named project (EWS, SWF, WRF), costing most likely, 3 times or more, the amount ratepayers were originally informed it would cost, the District has the gall to say that costs for future actions for the facility are undetermined! Really! Future costs should be disclosed!

In August 2020, the CCSD submitted a CDP application to the County Planning Department. The County's response from Young Choi, was in the form of a 9-page "Information Hold." (Please see attached PDF). CCSD has failed to respond to many of the requirements outlined in that document. Last year, County Planner, Schani Siong made comments relating to the Draft Instream Flow Study, which have not been fully addressed--see below.

From: Schani Siong <ssiong@co.slo.ca.us>

Sent: Thursday, March 2, 2023 5:31 PM

To: Ray Dienzo <RDienzo@cambriacsd.org>; Ken Jarrett <Ken@stillwatersci.com>; Luster, Tom@Coastal

<Tom.Luster@coastal.ca.gov>; devin.usltrcd@gmail.com <devin.usltrcd@gmail.com>; devin_usltrcd.org <devin@us-ltrcd.org>; Baldwin, Donald@Wildlife

<Donald.Baldwin@wildlife.ca.gov>; Ethan <Ethan@stillwatersci.com>; cindycleve

<cindycleve@gmail.com>; Barker, Doug@Parks <Doug.Barker@parks.ca.gov>; Michniuk,

Dennis@Wildlife <Dennis.Michniuk@wildlife.ca.gov>; Kip J. Morais

<kmorais@co.slo.ca.us>; Drexhage, Katie@Parks <Katie.Drexhage@parks.ca.gov>; Leilani

Takano <leilani_takano@fws.gov>; Mitcham, Chad J <chad_mitcham@fws.gov>; Ogonowski,

Mark S <mark_ogonowski@fws.gov>; kmerk <kmerk@kevinmerkassociates.com>; Megan

Gerseny

<mgerseny@cambriacsd.org>; matthew.mcgoogan_noaa.gov <matthew.mcgoogan@noaa.gov>;

James Green <jgreen@cambriacsd.org>; Gus Yates <gyates@toddgroundwater.com>

Subject: RE: [EXT]Discuss Cambria CSD - Instream Flow Study Report

Hi Ray and all,

Thank you for arranging the meeting today with the TAC and the opportunity to comment on the IFS. The County has the following follow-up comments:

1. The County agrees that it would be a good idea to broaden the scope of the analysis to show a range of pumping within all seasons to analyze the potential impacts during those different scenarios. The study mentions that higher reduction of suitable migration days for juvenile steelhead may occur if pumping rates are above the daily average rate of 0.6 cfs assumed for the analysis. The analysis should include information that would account for worst case scenario (highest 1.43 cfs pumping rate) to fully understand the full extent of impacts. *If there is desire not to incur additional impacts beyond analyzed thresholds*

in this IFS— provide information on how operation will avoid doing so.

2. As part of the CDP review, the County must make required LCP findings for SRA and ESHA that CCSD have identified mitigation measures to lessen impacts to sensitive resources and species to maximum extent. For example, CCSD have been advised to incorporate a rescue and relocation protocol as part of the project. At what point would the rescue and relocation protocol be initiated? What does that look like and who are the responsible entities? Avoidance and minimization measures should be detailed out for identified impact, duration of impact, and responsible parties should be developed as part of the AMP.

SRA Findings:

e. Required findings: Any land use permit application within a Sensitive Resource Area shall be approved only where the Review Authority can make the following required findings:

- (1) The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design.
- (2) Natural features and topography have been considered in the design and siting of all proposed physical improvements.
- (3) Any proposed clearing of topsoil, trees, or other features is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource.
- (4) The soil and subsoil conditions are suitable for any proposed excavation; site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff.

ESHA Findings:

b. Required findings: Approval of a land use permit for a project within or adjacent to an Environmentally Sensitive Habitat shall not occur unless the applicable review body first finds that:

- (1) There will be no significant negative impact on the identified sensitive habitat and the proposed use will be consistent with the biological continuance of the habitat.
- (2) The proposed use will not significantly disrupt the habitat.

Sincerely,

Schani Siong

Supervising Planner

(p) [805-781-4374](tel:805-781-4374)

ssiong@co.slo.ca.us



The CCSD has not been able to prove that it is capable of running the facility for a 6-month period to produce 250-acre feet of water. The State Department of Finance, when they performed an audit of Proposition 84 Grant Funding received by SLO County, which CCSD received \$4.3 million of, said the following in its report of May 4, 2018.

Finding 2: Non-Operational Project

Although the Cambria Community Services District (Cambria), a local project sponsor, completed an Advanced Water Treatment Plant (Plant) in accordance with grant agreement [4600010880](#), the Plant is currently non-operational. Specifically, Cambria received over \$4.3 million in grant funds from DWR to construct a Plant that would provide approximately 240 to 250 acre-feet of water during a six-month dry period. Cambria reported in its June 2016 project completion report that it had completed construction of the Plant and had determined through intermittent testing that the Plant could produce the requisite amount of water. However, due to subsequent events, the Plant became non-operational. Specifically, on July 13, 2017, the Regional Board adopted Cease and Desist Order No. R3-2016-007 (Order), which required Cambria to immediately cease use of the evaporation pond, a key component of the Plant. According to the Regional Board, an inundation of surface water in January and February 2017 caused several regulatory violations that threatened water quality and the environment, resulting in the issuance of the Order. As a result, Cambria worked with the Regional Board to develop a plan to remediate the issues, which in December 2017 the Regional Board voted to accept. Cambria's plan involves ultimately abandoning the evaporation pond and modifying the Plant's water treatment process with a targeted completion date of August 2018. However, Cambria has not tested whether its modified Plant will be able to produce the requisite amount of water. As part of the grant agreement, Cambria must submit to DWR an annual Post-Performance Report that summarizes, among other things, the actual performance of the Plant compared to its expected performance and any additional information relevant to its continued operation.

Recommendations:

- A. Monitor Cambria's efforts in complying with the Regional Board's cease and desist order and modification of the Plant.
- B. After Plant modifications, require Cambria to test whether the new Plant can produce the

requisite 240 to 250 acre-feet of water over a six-month dry period and report the results of its testing to the District and DWR.

The CCSD has not provided evidence in the CDP application that it can supply the amount of water it is claiming to produce. The pumping rates the District anticipates using and the amount of time it hopes to run the facility during non-drought periods, make absolutely no sense. Should Clyde Warren be extracting from his 203 afy allotment of water while the district is pumping at the rates it is proposing, I see a huge problem occurring in the aquifer. I also see the high pumping rates as an issue for the habitat--specifically for California Steelhead. Because so much is not included in the CDP application, it almost appears as if the district is asking the County for an "extension" rather than a CDP, in order to complete the studies required, as well as to obtain results and data from the ZLD study, and so much more.

Of concern, also, is the CCSD's inability to address the issue of brine waste disposal. While a Zero Liquid Discharge (ZLD) Pilot Study is anticipated, it is premature--the study has not begun; there is no available data to draw from. To be asking SLO County to approve an untested method to address brine waste, is putting the cart before the horse. While the Pilot Study may not be a cost factor to the community, should it become a method to dispose of brine waste, the energy costs are prohibitive, and issues to the environment are hugely problematic. This should be especially troubling, as the CCSD is currently pursuing a Climate Crisis Policy, which I would assume would be looking at best practices to eliminate greenhouse gases.

"What are the pitfalls of using Zero Liquid Discharge?"

(Source: <https://www.wwdmag.com/what-is-articles/article/10939887/what-is-zero-liquid-discharge>)

Zero liquid discharge involves high capital expenditures and running costs, as well as high energy consumption, which leads to significant emission of greenhouse gases.

ZLD leaves a solid waste by-product, dry sludge, containing high levels of hazardous chemicals and heavy metals."

Also, it has not been made clear yet as to whether a permit is required to do a ZLD Pilot Study. That needs to be remedied!

Many of the studies required to obtain a CDP, have not yet been completed or even begun--I refer to the Instream Flow Study(ies) and the Biological Assessment. Completed data from both of these and all other studies, should be a part of this application. Too many unresolved issues still remain, and it is very difficult for me to understand how the district expects to receive approval of a half-baked Project Description/application from the County.

The Coastal Commission has been addressing issues related to the project(s) for over 10 years. Their concerns related to mitigation for Environmentally Sensitive Habitat Areas (ESHA) have not been addressed. A plan for the decommissioned evaporation pond has not been made clear. CCC has asked for it to be returned to natural habitat--I don't see clarification of that in the application.

There is much for the Board to consider, as I imagine there will be for the County, should you decide to approve item 7A today.

Thank you for the opportunity for me to provide some comments on this item.

Regards,

Tina Dickason

Cambria resident



San Luis Obispo Flood Control and Water Conservation District

Proposition 84 Bond Program

Grant Agreements 4600009717, 4600010061,
4600010880, and 4600011487

Team Members

Jennifer Whitaker, Chief
Cheryl L. McCormick, CPA, Assistant Chief
Diana Antony, CPA, Manager
Vance Cable, Supervisor
Jared Smith

Final reports are available on our website at <http://www.dof.ca.gov>

You can contact our office at:

California Department of Finance
Office of State Audits and Evaluations
915 L Street, 6th Floor
Sacramento, CA 95814
(916) 322-2985



Transmitted via e-mail

May 4, 2018

Ms. Karla Nemeth, Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

Dear Ms. Nemeth:

**Final Report—San Luis Obispo Flood Control and Water Conservation District,
Proposition 84 Grant Audit**

The California Department of Finance, Office of State Audits and Evaluations, has completed its audit of the San Luis Obispo Flood Control and Water Conservation District's (District) grants 4600009717, 4600010061, 4600010880, and 4600011487, issued by the California Department of Water Resources.

The enclosed report is for your information and use. The District's response to the report findings is incorporated into this final report. The District agreed with our findings. We appreciate their assistance and cooperation during the engagement, and their willingness to implement corrective actions. This report will be placed on our website.

If you have any questions regarding this report, please contact Diana Antony, Manager, or Vance Cable, Supervisor, at (916) 322-2985.

Sincerely,

Original Signed by

Jennifer Whitaker, Chief
Office of State Audits and Evaluations

Enclosure

cc: Ms. Cindy Messer, Chief Deputy Director, California Department of Water Resources
Ms. Katherine Kishaba, Deputy Director of Business Operations, California Department of Water Resources
Mr. Michael Tufts, Acting Deputy Assistant, Bond Accountability Office, California Department of Water Resources
Mr. David Whitsell, Chief Auditor, California Department of Water Resources
Mr. Bryan Cash, Assistant Secretary for Administration and Finance, California Natural Resources Agency
Ms. Julie Alvis, Deputy Assistant Secretary, California Natural Resources Agency
Mr. Wade Horton, County Administrative Officer, County of San Luis Obispo
Mr. John Peschong, Chair, Board of Supervisors, County of San Luis Obispo

BACKGROUND, SCOPE AND METHODOLOGY

BACKGROUND

California voters approved the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84). The \$5.4 billion of bond proceeds finance a variety of natural resource programs.

Established by the Legislature in 1945, the San Luis Obispo Flood Control and Water Conservation District (District) is tasked with identifying flooding problems, recommending solutions, and helping local areas in the County of San Luis Obispo (County) implement recommended solutions. Governed by the County Board of Supervisors, the District shares the same staff and the same geographic boundaries as the County.

The District received four grants from the California Department of Water Resources (DWR) as part of DWR's Integrated Regional Water Management Program (IRWM), designed to improve water supply reliability and to improve and protect water quality. Specifically:

- Grant 4600009717 – \$10.4 million to assist with four separately identified projects.
- Grant 4600010061 – \$1 million to update the San Luis Obispo County Region's IRWM Plan to meet standards established in the August 2010 IRWM Program Guidelines.
- Grant 4600010880 – \$6.3 million to assist with four separately identified projects.
- Grant 4600011487 – \$3.7 million to assist with four separately identified projects.

For each grant, the District is required to provide a minimum of 25 percent of the total project cost as match funding. The District is the lead agency for administering the grants and collaborates with several Local Project Sponsors (LPS) to oversee the completion of projects awarded under the grants. An LPS is a local public agency which provides project management, oversight, and compliance administration. The LPSs are responsible for completing the project deliverables and providing the support for reimbursable grant expenditures.

SCOPE

In accordance with the California Department of Finance's bond oversight responsibilities, we audited the following District Proposition 84 funded grants:

<u>Grant Agreement</u>	<u>Audit Period</u>
4600009717	August 16, 2011 through December 21, 2016 ¹
4600010061	September 30, 2008 through March 31, 2015
4600010880	January 1, 2010 through March 20, 2017 ²
4600011487	October 1, 2014 through September 26, 2016 ³

¹ An interim audit was conducted on grant 4600009717 as the grant period ends May 30, 2018.

² An interim audit was conducted on grant 4600010880 as the grant completion report had not been submitted at the time of our fieldwork in November 2017.

³ An interim audit was conducted on grant 4600011487 as the grant period ends June 30, 2019.

The audit objectives were to determine whether the District claimed grant expenditures in compliance with the grant requirements and to determine whether grant deliverables were completed as required. We did not assess the efficiency or effectiveness of program operations. Further, no assessment was performed on the reasonableness of the land acquisition costs or the conservation value of acquired land or projects completed.

The District's management is responsible for ensuring accurate financial reporting and compliance with applicable laws, regulations, and grant requirements. DWR and the California Natural Resources Agency are responsible for the state-level administration of the bond program.

METHODOLOGY

To determine whether grant expenditures were in compliance with the grant requirements; and if the grant deliverables were completed, we performed the following procedures:

- Examined grant files, grant agreements, and applicable policies and procedures, to gain an understanding of the IRWM grant projects and program.
- Interviewed DWR, District, and LPS personnel responsible for overseeing reimbursable grant expenditures to obtain an understanding of how each party oversees various grant funded projects.
- Selected a sample of projects to determine if claimed expenditures, including match, were allowable (i.e. grant-related, incurred within the grant period), and supported by accounting records by reviewing District and LPS accounting records, vendor invoices, and bank statements or similar documentation. Projects were selected to achieve representation of the various LPS, project statuses, and project types.
- Evaluated whether a sample of grant compliance terms and deliverables were met by reviewing quarterly progress reports, project completion reports certified by a California Registered Civil Engineer, engineering and inspection reports, construction site photos, and conducting a site visit to verify existence.

In conducting our audit, we obtained an understanding of the District's internal controls, including any information systems controls that we considered significant within the context of our audit objectives. We assessed whether those controls were properly designed, implemented, and operating effectively. No deficiencies in internal control were identified during our audit or were determined to be significant within the context of our audit objectives.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Except as noted below, the grant expenditures claimed, including match, complied with the grant agreements' requirements. Additionally, the grant deliverables available for review at the time of our audit fieldwork in November 2017, were completed as specified in the grant agreements. However, as detailed in Finding 2, one of the projects funded under agreement 4600010880 was non-operational as of our audit fieldwork in November 2017. The Schedules of Claimed and Questioned Amounts are presented below.

Schedule of Claimed and Questioned Amounts

Grant Agreement Number 4600009717		
Task	Claimed¹	Questioned
Direct Project Administration	\$ 55,556	\$ 0
Construction/Implementation	7,883,471	0
Total Grant Funds	\$ 7,939,027	\$ 0
Match Funds	47,361,486	0
Total Project Expenditures	\$ 55,300,513	\$ 0

Grant Agreement Number 4600010061		
Task	Claimed	Questioned
Personnel Services	\$ 400,000	\$ 113,603
Professional and Consultant Services	600,000	0
Total Grant Funds	\$ 1,000,000	\$ 113,603
Match Funds	434,660	0
Total Project Expenditures	\$ 1,434,660	\$ 113,603

Grant Agreement Number 4600010880		
Task	Claimed²	Questioned
Direct Project Administration	\$ 281,220	\$ 0
Land Purchase/Easements	13,821	0
Planning/Design/Engineering/Environmental Documentation	1,088,547	0
Construction/Implementation	4,939,402	0
Total Grant Funds	\$ 6,322,990	\$ 0
Match Funds	3,089,850	0
Total Project Expenditures	\$ 9,412,840	\$ 0

Grant Agreement Number 4600011487		
Task	Claimed³	Questioned
Planning/Design/Engineering/Environmental Documentation	11,970	\$ 0
Construction/Implementation	337,831	0
Total Grant Funds	\$ 349,801	\$ 0
Match Funds	86,259	0
Total Project Expenditures	\$ 436,060	\$ 0

¹ DWR awarded \$10,401,000; however, the District only claimed \$7,939,027 as of December 21, 2016.

² DWR awarded \$6,323,610; however, the District only claimed \$6,322,990 as of March 20, 2017.

³ DWR awarded \$3,702,762; however, the District only claimed \$349,801 as of September 26, 2016.

Finding 1: Expenditures Claimed Outside Allowable Period

The District claimed \$113,603 for work that was performed prior to the beginning of the allowable period of grant agreement 4600010061. Specifically, the allowable period for grant funds and match funding are distinct. Grant Agreement, section 11, states that work performed after the grant award date, November 29, 2012, shall be eligible for reimbursement. However, the District erroneously used section 6 of the Grant Agreement, which allows match funding to be claimed if performed after September 30, 2008. Consequently, the \$113,603 claimed represented expenditures for work performed prior to November 29, 2012.

Recommendations:

- A. Remit \$113,603 to DWR for the portion of project expenditures reimbursed for work performed prior to the beginning of the grant term.
- B. Ensure claimed expenditures are incurred within the appropriate grant term. The grant agreement provisions should be used as a guide to develop any desk procedures for preparing reimbursement claims.

Finding 2: Non-Operational Project

Although the Cambria Community Services District (Cambria), a local project sponsor, completed an Advanced Water Treatment Plant (Plant) in accordance with grant agreement 4600010880, the Plant is currently non-operational. Specifically, Cambria received over \$4.3 million in grant funds from DWR to construct a Plant that would provide approximately 240 to 250 acre-feet of water during a six-month dry period. Cambria reported in its June 2016 project completion report that it had completed construction of the Plant and had determined through intermittent testing that the Plant could produce the requisite amount of water. However, due to subsequent events, the Plant became non-operational.

Specifically, on July 13, 2017, the Regional Board adopted Cease and Desist Order No. R3-2016-007 (Order), which required Cambria to immediately cease use of the evaporation pond, a key component of the Plant. According to the Regional Board, an inundation of surface water in January and February 2017 caused several regulatory violations that threatened water quality and the environment, resulting in the issuance of the Order. As a result, Cambria worked with the Regional Board to develop a plan to remediate the issues, which in December 2017 the Regional Board voted to accept. Cambria's plan involves ultimately abandoning the evaporation pond and modifying the Plant's water treatment process with a targeted completion date of August 2018. However, Cambria has not tested whether its modified Plant will be able to produce the requisite amount of water. As part of the grant agreement, Cambria must submit to DWR an annual Post-Performance Report that summarizes, among other things, the actual performance of the Plant compared to its expected performance and any additional information relevant to its continued operation.

Recommendations:

- A. Monitor Cambria's efforts in complying with the Regional Board's cease and desist order and modification of the Plant.
- B. After Plant modifications, require Cambria to test whether the new Plant can produce the requisite 240 to 250 acre-feet of water over a six-month dry period and report the results of its testing to the District and DWR.



COUNTY OF SAN LUIS OBISPO
Department of Public Works
John Diodati, Interim Director

April 13, 2018

TRANSMITTED VIA EMAIL ONLY

Ms. Jennifer Whitaker, Chief
Office of State Audits and Evaluations
Department of Finance
915 L Street
Sacramento, CA 95814-3706

Subject: Response to Draft Report-San Luis Obispo Flood Control and Water Conservation
District, Proposition 84 Grant Audit

Dear Ms. Whitaker:

We are in receipt of your draft audit report dated March 30, 2018 and have prepared the attached responses.

The District appreciates the opportunity to respond to your recommendations and findings, and hope for mutual resolution. If you have any questions regarding the responses, please contact Mladen Bandov, Water Resources Engineer, or Straith Smith Zanartu, Finance Division Manager, at (805) 781-5252.

Sincerely,

"Original signed by"

JOHN DIODATI
Interim Director

Enclosure

c: Wade Horton, County of San Luis Obispo Administrative Officer
Mark Hutchinson, Deputy Director, Department of Public Works
Straith Smith Zanartu, Finance Division Manager, Department of Public Works
Wendy Hall, Division Manager Administration, Department of Public Works
Courtney Howard, Division Manager Water Resources, Department of Public Works
Kerry Bailey, Audit Chief, Auditor Controller Treasurer Tax Collector
Mark Maier, Auditor, Auditor Controller Treasurer Tax Collector

File: CF 900.48.01.01

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**San Luis Obispo Flood Control and Water Conservation District
Department of Public Works, County of San Luis Obispo
Proposition 84 Grant Audit
Responses to Findings**

Response to Finding #1: Expenditures Claimed Outside Allowable Period

Regarding Grant Agreement 4600010061, at the time the initial billing was done, the Project Manager at Department of Water Resources indicated that the budget could be reallocated via a formal budget adjustment between categories to align with the actual costs incurred for the program. This budget was adjusted on Amendment #1 to the grant agreement, which was executed on February 9, 2015. Shortly after executing the Amendment, Invoice #1 was submitted to Department of Water Resources by the District as originally prepared. Unfortunately, when the budget was reallocated within the three budget categories (Personnel, Operating Expenses, and Professional Services), the amounts and categories were incorrectly reapportioned. Since the budget adjustment was completed after the billing was prepared, the District did not discern this error as this was the District's first and only billing. It was the intent of both parties to mirror the invoice and the budget to reconcile the grant.

Due to the fact that the budget adjustment was not completed in alignment with the billing, the District is proposing two alternatives instead of returning \$113,603. The first alternative would be for the District to work with the Department of Water Resources and request a budget amendment to realign the budgeted line items with actual expenditures, which was the intent of the budget amendment originally. The second alternative would be that since the District has sufficient expenditures in other budget line items that do fit within the grant timeline criteria and program scope, the District would resubmit these expenditures to the Department of Water Resources for their approval, and ultimately back to the Department of Finance for their audit.

The District takes grant program compliance very seriously, values the ongoing partnerships and continued collaboration with the Department of Water Resources, who have been an integral partner in many of District's programs. The District also understands the Department of Finance's role in safeguarding grant funding to ensure resources are spent in accordance with the grant's scope of work.

As recommended, the District will develop a grant agreement procedure manual. In addition, a supplementary review process will be implemented regarding follow up on budget adjustments to ensure that the Grantor and Grantee are both in agreement with any budget revisions.

Response to Finding #2: Non-Operational Project

The District agrees that the Cambria Community Services District (CSD) emergency water supply project is currently non-operational and they are working to modify the facility so that it is operational for future drought conditions. Although the CSD submits annual post-performance reports that summarize the actual performance of the facility, the District will request additional monthly reports from the CSD to monitor its compliance with the Regional Water Board's cease and desist order. The District is committed to taking all actions necessary to satisfy its obligations under the grant agreement, including those set forth in Paragraph 20 related to operation and maintenance of the project. Upon modification of the facility and pursuant to the grant agreement and the District's related funding agreement with the CSD, the District will direct the CSD to test and report to the District and DWR that the facility can achieve the benefits stated in the grant agreement.



COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING
TREVOR KEITH, DIRECTOR

August 14, 2020

Mr. Ray Dienzo
Cambria Community Services District
PO BOX 65
Cambria, CA 93428

Subject: Information Hold for DRC2013-00112 (CCSD SWF)

Dear: Mr. Dienzo

Your application has been reviewed by the Department of Planning and Building, and the information that is on the attached list is required before it can be accepted as complete for processing, as required by California Government Code Section 65943.

You can help expedite the review process by making sure all the information listed below is submitted at one time, and that the re-submittal package has the project number on a cover sheet. If the requested information is not received within 90 days of this letter, your application will be deemed withdrawn (pursuant to Section 22.64.030B of the Land Use Ordinance / Section 23.02.056(a) of the Coastal Zone Land Use Ordinance). You may request an additional 90-day extension in writing if more time is needed to complete the information for re-submittal.

Upon the submittal of this information your application can be accepted as complete for processing and staff will begin its environmental determination pursuant to the California Environmental Quality Act (CEQA). During the environmental review process, you may be asked to provide additional information.

Your application is subject to a discretionary review process. A discretionary permit requires the review and approval of the Administrative Hearing Officer, the Subdivision Review Board, the Planning Commission or the Board of Supervisors. A discretionary permit may be approved, approved with conditions or denied. Application for a discretionary permit does not guarantee approval, whether a project complies with all applicable standards or has been recommended for approval. All decisions on discretionary permits can be appealed to the Board of Supervisors, who will then make the final decision on the project.

If you have any questions concerning these requirements, please contact the project manager at (805) 781-2086 or via email at ychoi@co.slo.ca.us.

Sincerely,

A handwritten signature in black ink, appearing to be "Y Choi", written over a horizontal line.

Young Choi
Planner

Items Required for Acceptance

Based upon preliminary review, the items in this list are required before your project can be accepted as ***complete for processing***.

The current Adaptive Management Plan (AMP) is unclear on how the AMP will work towards implementing Local Coastal Program requirement. The AMP can be improved by clarifying the impacts and providing additional information on how AMP can implement the project mitigation measures, CZLUO (Title 23) requirements, as well as consistency with Coastal Plan Policies.

1. The proposed project, and the proposed mitigation (BIO-7) is unclear whether the impacts to riparian, wetland, and stream areas as designated as Environmentally Sensitive Habitat Area (ESHA) have adequate mitigations.
 - a. Please provide a preliminary concurrence letter from resource agency, including, but not limited to, California Fish and Wildlife, U.S. Fish and Wildlife Service, and State Water Resource Control Board, regarding the proposed Adaptive Management Plan.
 - b. Project Description stated that additional instream flow study of San Simeon Creek is tentatively scheduled for completion in Summer of 2020. Please provide update to the County once the flow study report is ready for review.
2. Please clarify the CCSD's diversion amount from San Simeon Creek. Please submit a copy of a license documentation confirming the diversion from San Simeon Creek from SWRCB.
3. Project operation can last 24 hours during drought times. The project may have a noise impact. Please provide the noise level at the property line.

Several provisions within CZLUO requires special finding for the project and requires feasibility study. Please consult with project biologist to provide feasibility study (siting) as well as required findings for the project.

4. Below is the summary of applicable Title 23 and Coastal Plan Policies that are applicable to the proposed project.

CZLUO 23.08.288 (d) (Public Utility Facilities) does not allow public utility facilities located within prime agricultural soils, ESHA, or Hazard findings, unless a finding is made by the approval body. Applications for Public Utility Facilities in the above sensitive areas shall include a feasibility study, that includes constraints analysis, and analyze alternative locations.

CZLUO 23.04.050 (Non-Agricultural Uses In The Agricultural Land Use Category)
Supplemental non-agricultural uses may be established only if the following findings are made by the applicable approval body:

- (1) For prime soils, it has been demonstrated that no alternative project site exists except on prime soils; and
- (2) The least amount of prime soils possible will be converted; and
- (3) The proposed use will not conflict with surrounding agricultural lands and uses.

CZLUO 23.07.164 (Sensitive Resource Area Permit and Processing Requirements) Any land use permit application within a Sensitive Resource Area shall be approved only where the Review Authority can make the following required findings:

- (1) The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design.
- (2) Natural features and topography have been considered in the design and siting of all proposed physical improvements.
- (3) Any proposed clearing of topsoil, trees, or other features is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource.
- (4) The soil and subsoil conditions are suitable for any proposed excavation; site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff.

CZLUO 23.07.170 (Environmentally Sensitive Habitats) Approval of a land use permit for a project within or adjacent to an Environmentally Sensitive Habitat shall not occur unless the applicable review body first finds that:

- (1) There will be no significant negative impact on the identified sensitive habitat and the proposed use will be consistent with the biological continuance of the habitat.
- (2) The proposed use will not significantly disrupt the habitat.

CZLUO 23.07.172 (Wetland)

Open space easement required: A land use or construction permit for a structure larger than 1000 square feet in floor area shall not be approved on a parcel of one acre or larger that contains a wetland, unless the property owner first grants the county or an approved land trust an open space easement or fee title dedication of all portions of the site not proposed for development, as well as the entire wetland.

CZLUO 23.07.174 (Streams and Riparian Vegetation)

Structures that divert all or a portion of streamflow for any purpose, except for agricultural stock ponds with a capacity less than 10 acre-feet, shall be designed and located to not impede the movement of native fish or to reduce streamflow to a level that would significantly affect the production of fish and other stream organisms.

CZLUO 23.07.176 (Terrestrial Habitat Protection)
Vegetation that is rare or endangered, or that serves as habitat for rare or endangered species shall be protected. Development shall be sited to minimize disruption of habitat.

Following Coastal Plan Policies are pertinent to the proposed project. Please review the Coastal Plan Policies (attached) and please provide a written justification of how the proposed project will meet the following policies:

Chapter 6 - Environmentally Sensitive Habitats

Policy 3. Habitat Restoration – requires restoration of damaged habitats as a condition of approval when feasible.

Policy 7. Protection of Environmentally Sensitive Habitats – requires restoration of wetlands.

Policy 8. Principally Permitted Use – requires special findings if the proposed project is not principally permitted use (special use).

Policy 11 and 12. Regional Water Quality Control Board “208” Program and CDFW Review - RWQCB/CDFW review may be required.

Policy 16. Adjacent Development – Development shall be located as far away from the wetland as feasible.

Policy 17 and 18. Wetland Buffer – requires buffer of minimum of 100 feet in width measured from upland extent of the wetland. For buffers less than 100 feet, mitigation measure shall be required to ensure wetland protection.

Policy 20. Coastal Streams and Riparian Vegetation – requires protection and preservation of natural hydrological system and ecological function of coastal streams.

Policy 21. Development in or Adjacent to a Coastal Stream – requires design and siting of the project to prevent impacts to coastal habitats.

Policy 23. County and State Review of Coastal Stream Projects – requires SWRCB and the County to ensure that the beneficial use of coastal stream water is protected. The proposed project shall ensure that the quantity and quality surface water discharge from streams and rivers shall be maintained at levels necessary to sustain the functional capacity of streams.

Policy 22, and 25: Streambed Alteration and CDFW Review – requires review of 1601-1603, may also require a permit from USACE. All project must employ best feasible mitigation measures.

Policy 26. Riparian Vegetation – alteration of naturally occurring vegetation that protects riparian habitat is not permitted except for permitted streambed alteration (Policy 23) where no feasible alternative exists or an issue of public safety exists.

Policy 27. Stream Diversion Structures – shall be sited and designed to not impeded up and downstream movement of native fish or to reduce stream flows to a level which would significantly affect the biological productivity of the fish and other stream organisms.

Policy 28. Buffer Zone for Riparian Habitats – rural area requires 100 feet between any new development. Other uses that may be found appropriate are limited to utility lines, pipelines, drainage and flood control facilities, bridges and road approaches to bridges to cross a stream and roads when it can be demonstrated that: 1) alternative routes are infeasible or more environmentally damaging and 2) adverse environmental effects are mitigated to the maximum extent feasible.

Policy 28, 29 and 35: Protection of Terrestrial Habitats (TH) and Native Vegetation – TH and native vegetation shall be protected whenever possible. All development shall be designed to disturb the minimum amount possible of wildlife or plant habitat.

Chapter 7: Agriculture

Policy 1. Maintaining Agricultural Lands – requires prime agricultural land shall be maintained, or available for, agricultural production.

Policy 3. Non-Agricultural Uses – Non-agricultural developments shall meet the following requirements:

- a. No development is permitted on prime agricultural land. Development shall be permitted on non-prime land if it can be demonstrated that all agriculturally unsuitable land on the parcel has been developed or has been determined to be undevelopable.
- b. Continued or renewed agricultural use is not feasible as determined through economic studies of existing and potential agricultural use without the proposed supplemental use.
- c. The proposed use will allow for and support the continued use of the site as a productive agricultural unit and would preserve all prime agricultural lands.
- d. The proposed use will result in no adverse effect upon the continuance or establishment of agricultural uses on the remainder of the site or nearby and surrounding properties.
- e. Clearly defined buffer areas are provided between agricultural and non-agricultural uses.
- f. Adequate water resources are available to maintain habitat values and serve both the proposed development and existing and proposed agricultural operations.
- g. Permitted development shall provide water and sanitary facilities on-site and no extension of urban sewer and water services shall be permitted, other than reclaimed water for agricultural enhancement.
- h. The development proposal does not require a land division and includes a means of securing the remainder of the parcel(s) in agricultural use through agricultural easements.

As a condition of approval of non-agricultural development, the county shall require the applicant to assure that the remainder of the parcel(s) be retained in agriculture and, if appropriate, open space use by the following methods:

Agricultural Easement. The applicant shall grant an easement to the county over all agricultural land shown on the site plan. This easement shall remain in effect for the life of the non-agricultural use and shall limit the use of the land covered by the easement to agriculture, non-residential use customarily accessory to agriculture, farm labor housing and a single-family home accessory to the agricultural use.

Open Space Easement. The applicant shall grant an open space easement to the county over all lands shown on the site plans as land unsuitable for agriculture, not a part of the approved development or determined to be undevelopable. The open space easement shall remain in effect for the life of the non-agricultural use and shall limit the use of the land to non-structural, open space uses.

Chapter 8: Public Works

Policy 2. New or Expanded Public Works Facilities - New or expanded public works facilities shall be designed to accommodate but not exceed the needs generated by projected development within the designated urban reserve lines.

Chapter 9: Coastal Watershed

Policy 1. Preservation of Groundwater Basins - The safe yield of the groundwater basin, including return and retained water, shall not be exceeded except as part of a conjunctive use or resource management program which assures that the biological productivity of aquatic habitats are not significantly adversely impacted.

Policy 2. Water Extractions - Groundwater levels and surface flows shall be maintained to ensure that the quality of coastal waters, wetlands and streams is sufficient to provide for optimum populations of marine organisms, and for the protection of human health.

Policy 3. Monitoring of Resources - County shall require applicants to install monitoring devices and participate in water monitoring management programs.

Policy 8, 9, and 10 - Timing of Construction and Grading, Minimizing Sedimentation, and Drainage Provision - avoid rainy season, if there is a potential for serious erosion and sedimentation problems, and appropriate control measures shall be used to minimize erosion and sedimentation. Site design shall ensure that drainage does not increase erosion.

Policy 11- Preserving Groundwater Recharge - In suitable recharge areas, site design and layout shall retain runoff on-site to the extent feasible to maximize groundwater recharge and to maintain in-stream flows and riparian habitats.

Other Items

Other information – Please note that based upon review of the requested items and responses from other referrals additional information may be required.

- Additional items may be required as Staff receives referral response from other agencies. Once received, staff will forward referral response to your project team.



COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING
TREVOR KEITH, DIRECTOR

THIS IS A NEW PROJECT REFERRAL / SUMMARY *

DATE: 7/26/2020

TO: 2nd District Legislative Assistant, Building Division, Environmental Health, Public Works, Stormwater, Cambria CSD, Army Corps of Engineers, Caltrans, CA Fish & Wildlife, Coastal Commission, RWQCB, State Parks, U.S. Fish & Wildlife, North Coast Advisory Council

FROM: Young Choi, ychoi@co.slo.ca.us (805) 788-2086

PROJECT NUMBER & NAME: DRC2013-00112 Cambria Sustainable Water Facility Project (SWF)

PROJECT DESCRIPTION*: Cambria CSD – Cambria Sustainable Water Facility Project (SWF)
 Development Plan / Coastal Development Permit DRC2013-00112
 Conditional Use Permit

The proposed project is the regular Development Plan / Coastal Development Permit for the Cambria Sustainable Water Facility Project (SWF), which was authorized and constructed under Emergency Permit ZON2013-00589 as the Cambria Emergency Water Supply Project (EWSP). A Subsequent Environmental Impact Report (SEIR) was prepared for the SWF and is available for review here: <https://www.cambriacsd.org/swf>. The Emergency Water Supply Project, together with the modifications derived from the SEIR along with consultation with other regulatory agencies, is the project sought by the Regular CDP.

The SWF project is intended to improve the reliability of the community's water supply during times of shortages. In addition to securing a reliable water supply for existing development, the SWF would accommodate buildout of the community in accordance with the provisions of the North Coast Area Plan. Please refer to attached project description.

APN(s): 013-051-024, -008

Please submit comments no later than 14 days from receipt of this referral. CACs please respond within 60 days. Thank you.

PART I: IS THE ATTACHED INFORMATION ADEQUATE TO COMPLETE YOUR REVIEW?

- YES (Please go on to PART II.)
 NO (Call me ASAP to discuss what else you need. We have only 10 days in which we must obtain comments from outside agencies.)

PART II: ARE THERE SIGNIFICANT CONCERNS, PROBLEMS OR IMPACTS IN YOUR AREA OF REVIEW?

- YES (Please describe impacts, along with recommended mitigation measures to reduce the impacts to less-than-significant levels, and attach to this letter.)
 NO (Please go on to PART III.)

PART III: INDICATE YOUR RECOMMENDATION FOR FINAL ACTION.

Please attach any conditions of approval you recommend to be incorporated into the project's approval, or state reasons for recommending denial.

**All information and/or material provided in the following Referral Package is valid for 90 days after this correspondence. After that time please contact the Project Manager for the most updated information.*



COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING
TREVOR KEITH, *DIRECTOR*

Date: August 12, 2020

To: Young Choi

From: Anthony Schuetze, Stormwater Program Manger

Subject: Referral Comments, DRC2013-00112

Thank you for the opportunity to provide information on the proposed project. Based on the information provided in the referral package, the applicant should be made aware of the following conditions and requirements that may impact the proposed project.

Recommended Project Conditions of Approval:

1. At the time of application for any construction permits, the applicant must account for the total area of disturbance associated with construction and indicate the limits of disturbance on the plans. Projects that disturb greater than 1.0 acre for construction related activities must enroll in the Construction General Permit (CGP) for Stormwater Discharges Associated with Construction (Order 2009-0009-DWQ).
2. This project and proposed operation may meet the criteria to require enrollment in the Industrial Stormwater General Permit (IGP) for Discharges Associated with Industrial Activities (Order 2014-0057-DWQ). The applicant should review the facilities Standard Industrial Classification (SIC) Code to determine if planned operation is a regulated industry.

Building Division Stormwater Comments:

1. Projects that are required to enroll in the Construction General Permit will be required to provide evidence of enrollment, including providing WDID#, NOI, QSD/P, and copy of SWPPP.
2. Based on your SIC Code, your facility may need to enroll in the IGP to comply with industrial stormwater regulations. If your SIC Code is a regulated industry, you must provide verification of enrollment in IGP by providing your Waste Discharge Identification Number prior to issuance of any land use or construction permit or submit information to the Central Coast Regional Water Quality Control Board demonstrating why the Industrial General Permit is not applicable to your facility.

From: [Christine Heinrichs](#)
To: [BoardComment](#)
Subject: Written comment June 20 meeting
Date: Monday, June 24, 2024 9:44:30 AM

Please include. Thank you.

Item 4: PUBLIC COMMENT:

First let me give a Shout-Out to Director Harry Farmer, for public service. After last week's meeting, he went out on Friday and removed the poison oak from the Main Street bridge. He didn't make a phone call, or work up a presentation for another meeting. He solved the problem. Bravo!

General Manager McElhenie said he would keep the public informed of the costs of the recent dispute with Coast Union School Board. Was the \$10,363 paid to District Counsel Carmel for additional legal advice, over and above his \$13,500 monthly retainer, for advice on the CUSD well dispute? Was the \$9,006.50 to Rutan & Tucker part of that? Thank you.

Item 6A PUBLIC COMMENT

Let me draw your attention to a couple of items on the Expenditure Report. Mr. McElhenie is advocating for cost cutting of the \$3,720 for AGP recording and archiving of board meetings, and \$1,275 for professional janitors to clean the public restrooms. Both these responsibilities would be assigned instead to in-house staff, as the restroom cleaning already has been.

That \$5,000 a month is dwarfed by other district expenses: legal bills amounting to over \$30,000 last month, nearly \$50,000 for the usual PG&E bill, and over \$14,000 in Confidential Professional Consulting and Coaching.

AGP's professional video and audio services are not easily replaced by staff members who lack expertise and training. Professional janitorial services keep the restrooms presentable for visitors, and allow Facilities & Resources staff to focus their energies on important district properties. Please consider reducing other expenses before cutting these important services. Thank you.

Item 7A PUBLIC COMMENT

Let me highlight several points.

Mr. McElhenie, in his narrative of this Agenda Item, states that funding for the project was approved by ratepayers. Perhaps he is unaware, but ratepayers never approved funding for this project. The board approved funding, in a meeting at which many ratepayers objected to it. You can review that August 4, 2014 meeting through the resources of AGP Video, which makes Cambria's past meeting easy to access through its archives. Well worth that \$3,720 a month!

The Agenda Item notes that future costs are undetermined. Those costs, however, would be substantial: constructing the Zero Liquid Discharge plant, trucking brine, operating the plant. Cost should be of concern for Cambrians. Potential costs are in the millions.

Two new transformers were installed during construction of the existing plant. What is the estimate for power use? How much will it add to Cambria's \$50,000 monthly bill?

The Project Description continues to include future "existing commitments." [The Coastal

Commission does not recognize any “grandfathered” connections, per its decision in Hadian, 2021, <https://documents.coastal.ca.gov/reports/2019/11/W32e/w32e-11-2019-report.pdf>] This has been the sticking point in past CDP applications. If the Project Description were limited to existing connections, the project would have a better chance of getting a permit approved, as explained by Paavo Ogren back in 2019.

The Brine Storage Treatment and Disposal section, pages 127-128, is vague. If the untested Zero Liquid Discharge technology works, it will cost millions to implement. If not, it will cost millions to store and truck the brine waste away. This application pushes those issues to some undetermined future date, but Cambrians and the board may want to confront these prospects now.

The Adaptive Management Plan included is the proposed plan from 2017. Its recommendations for establishing baselines were not carried out. This AMP was based on Cleveland Biological’s inadequate wildlife observations. The district contracted with Merk & Associates to get the work done in 2022, but that contract was not carried out, purportedly because the scope of work was expanded to include Van Gordon Creek. Was any work done? The public didn’t get any reports. Utilities reports state that work is “ongoing,” and a completed report is due in June. That biological information needs to be included in this application.

I ask the board to refer this application back to staff to address these significant questions. And to get those biological reports done. Thank you.

--

Christine Heinrichs