

United Lot Owners of Cambria
“UnLOC”



Steve Monowitz
California Coastal Commission
725 Front St., Suite 300
Santa Cruz, CA 95060-4508

Re : Cambria Minor Use Permit Appeal

Dear Steve:

Thank you for taking the time on the telephone last week to discuss the submitted appeal to a recent application for a Minor Use Permit in Cambria. In our discussion, you had stated that you felt the appeal might have merit on the grounds that the number of water connection commitments pending at Cambria Community Service District (CCSD) would outstrip the available water supply. You stated further that CCC staff believes that the Baseline Water Supply Analysis prepared by Kennedy Jenks for CCSD supports that conclusion. This is not correct.

The CCSD District Engineer submitted a detailed analysis with his report to the District Board in preparation for the hearing on whether to declare a water shortage emergency. The analysis began by calculating the total number of water connections pending, including the 2001 Intent Letters, in equivalent dwelling units (EDU's). It went on to calculate water available from San Simeon Creek using formulae developed by Kennedy Jenks. *The report concluded that the District would still have the capacity to support an additional 121 EDU's even after all pending commitments are met.*

The engineer's calculations excluded any production from Santa Rosa Creek, even though the replacement well at the high school is completed and capable of production if required.

This is all against the backdrop of the peer review that was performed by Navigant Engineering that showed that Kennedy Jenks understated the water supply by 10%. The issues raised in the Navigant report have never been addressed by CCSD.

Community testimonials abound about how they're out of water and can't support any growth, but the fact is that there has never been any professional report that supports that conclusion. The professionals only conclude that they are at an increased risk of supply curtailment in the event of a drought. The Engineer's report lists a qualification that quotes the Kennedy Jenks report as stating that in the event of multiple back-to-back critically dry years the community would have to cut back use by 25%. He gives the opinion that this could be difficult to achieve given current conservation levels. But according to the USGS report on the same subject, that kind of drought event has a frequency of something over 100 years. Cambria's current per capita consumption is about 95 gpcd. Santa Cruz' normal consumption is 75 gpcd, 21% less without emergency measures.

The CCSD Board, with knowledge and understanding of their engineer's report, concluded that it was still safe to grant the Intent Letters for 2001 before declaring the moratorium. We think that the Board is being ultra-conservative with their water supply even with their position. If the CCC were to overrule them and attempt to stop the permitting process of the pending projects requiring connections on the grounds of inadequate water supply it would be totally groundless. To make matters worse, if you took such an action it would cost CCSD \$2.27 million in connection fees that

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it is counting on at a time when the District is struggling to find the funds to continue with work to solve the problem.

Upholding an appeal on this pending project and upcoming projects will have a devastating financial impact on the applicants and the community itself. We are asking that you weigh all factors very carefully in considering this upcoming case, and make sure that you have a fair and un-biased interpretation of the community's water supply before making any recommendations.

A copy of the District Engineer's report is enclosed for your review.

Thank you for your consideration.

Sincerely,

Deryl Robinson
President, United Lot Owners of Cambria

cc: Vern Hamilton, CCSD