

January 15, 2024

Comments Agenda Item B-1 LAFCO Meeting January 18, 2024 – Cambria CSD MSR

Please accept this as my comments submission on Item B-1 Municipal Service Review and Sphere of Influence Study for Cambria Community Services District

**1. Status of and, opportunities for, shared facilities is vague.**

The determination section on the status of and, opportunities for, shared facilities is vague. It lacks known initiatives, ideas, or suggestions.

It is well known that the 2019 San Simeon Coastal Development Permit for its wastewater treatment plant includes moving it away from the ocean. This CDP requires examining a regional processing alternative meaning with San Simeon’s neighbor Cambria. This “shared opportunity” should be duly noted in the MSR.

San Simeon CSD is considering divestiture of its water and wastewater services and potential dissolution. The County may be an obvious recipient with the formation of a CSA. However, it is likely that LAFCO will require that other alternatives be considered. Those would, of course, include Cambria. LAFCO is fully aware of this initiative. This is non-trivial and needs to be included in the MSR.

Coordination between neighboring agencies for emergency response services lacks the obvious identification of “neighboring agencies” and lacks examples of those services. San Simeon CSD is a neighboring agency. Emergency response services suggestions should include water and wastewater operations and critical administration services like customer billing and bills payment or engineering.

The following is what is in the proposed MSR:

**5. Status of and, opportunities for, shared facilities**

- a. At present, the distinction between District and County services with the service boundary is clear.
- b. Opportunities for shared facilities may include:
  - i. Coordination between the District and nearby private water purveyors

- ii. Coordination between neighboring agencies providing emergency response services
  - iii. Coordinated open space preservation
  - iv. District and County parks and recreational facilities
- c. The potential to create shared relationships for providing some services is suggested and may be appropriate when providing certain services.
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## **2. Inclusion of the California Voting Rights Act (CVRA) requirement for by-district elections**

In the Determinations section of the MSR, item 6. Accountability for community service needs, including governmental structure and operational efficiencies, California Voting Rights Act requirements are not mentioned.

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### **6. Accountability for community service needs, including governmental structure and operational efficiencies**

- a. CCSD is governed by a five-member Board of Directors that are elected to four-year terms. Regularly scheduled monthly Board meetings are held and all meetings are open to the public and are publicly posted a minimum of 72 hours prior to the meeting in accordance with the Brown Act.
- b. CCSD maintains an up-to-date website which contains District information, documents, and updates.
- c. CCSD has demonstrated accountability and transparency in its disclosure of information and cooperation during the process of this MSR. The District responded to the questionnaires and cooperated with document requests.
- d. LAFCO determines that CCSD is accountable and transparent.

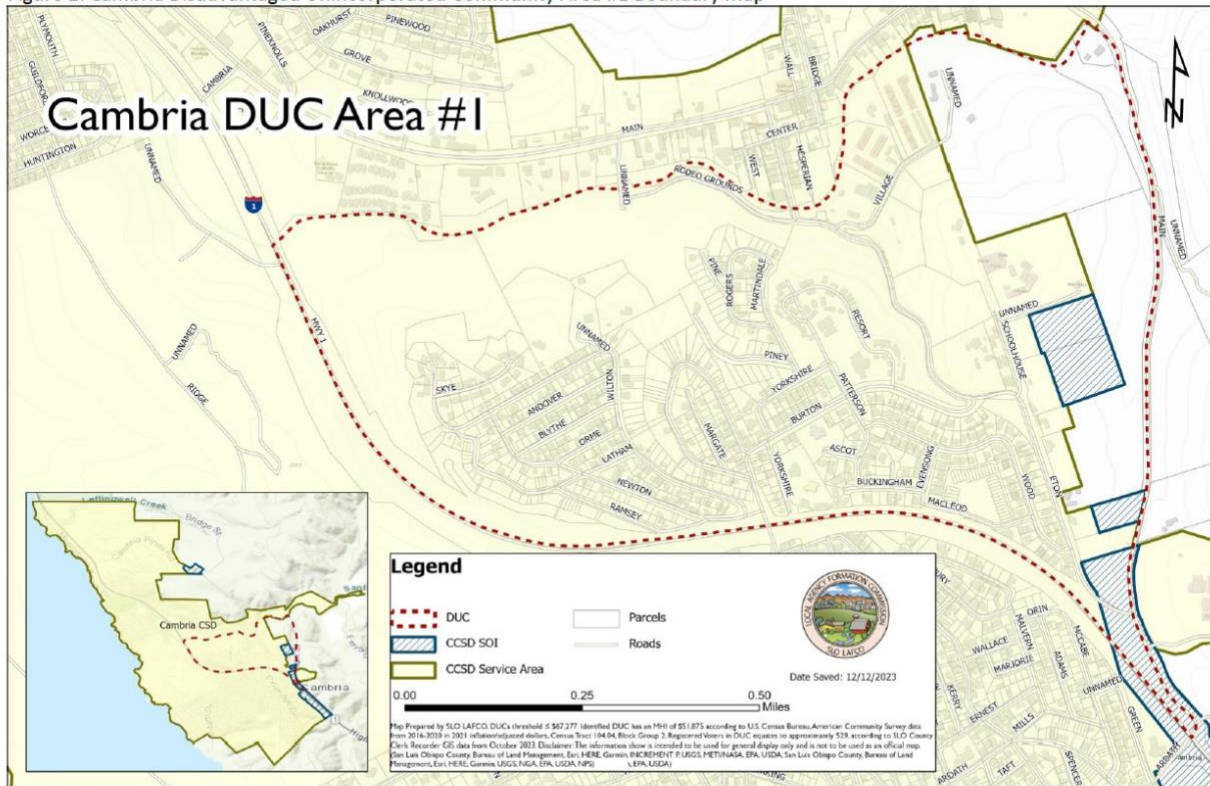
CCSD is still using an at-large-election system for its directors. The CVRA requires communities, including special districts with more than 100 voters, to hold by-district elections. The MSR should include the CVRA requirements for CCSD to move to by-district elections to comply with the law for community representation.

The Cambria Community Healthcare District moved to by-district elections in 2022. Its territory overlaps Cambria CSD's. Much smaller San Simeon CSD also changed to by-district elections in 2022.

NOTE: The MSR identifies the large DUC Area #1 with 529 voters. It is unclear if this DUC would be considered in a move to by-district elections. However, the MSR draws attention to this special area of Cambria CSD.

DUC	Census Block Group	Median Household Income	Registered Voters <sup>14</sup>
Cambria DUC Area #1	104.04.2	\$51,875	529

Figure 2: Cambria Disadvantaged Unincorporated Community Area #1 Boundary Map



### Social or Economic Communities of Interest in the Area

Respectfully,  
 Henry Krzciuk  
 San Simeon Resident  
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January 15, 2024

Comment Agenda Item B-2 LAFCO Meeting January 18, 2024

Please accept this as my comment on Item B-2 Municipal Service Review and Sphere of Influence Study for Avila Beach Community Services District

*1. Overstatement of Future Water Demand*

It seems like there is a material overstatement of “Future Water Demand,” as shown on page 22 of the MSR.

Table 5: Historic Water Demand

	2016	2017	2018	2019	2020	2021	2022	Average
<b>Water Demand (AFY)</b>	77.73	75.36	75.88	75.55	86.73	77.4	75.9	77.8

Future water demand is shown as:

Table 6: Future Water Demand

	2025	2030	2035	2040	Buildout
<b>ABCSD Estimated Population</b>	482	519	573	602	626
<b>Gallons Per Capita Per Day</b>	177	177	177	177	177
<b>Estimated Water Demand (AFY)</b>	96	103	114	119	124

Per the MSR, the present population of ABCSD is 461, with an average annual water demand of 77.8 AFY.

The question/discrepancy appears in the estimated Gallons Per Capita Per Day (GPCD) of 177. That is an extraordinarily high amount of water usage per day.

A recent California Department of Water Resources Study shows present new home water use per capita of approximately 55 gpcd.

New residential construction will have water-efficient appliances and fixtures. Of course, the Department of Water Resources estimates less usage in the future.

The DWR estimates 55 GPCD, which is dramatically lower than the 177 gallons per capita day ABCSD uses in their calculations.

Using a more likely number for future water demand of 55 gpcd, the buildout water demand would be 10 AFY associated with a residential population increase of 165 from the present 461 to a full buildout of 626 residents.

That means the estimated water demand for buildout would be 77.8 AFY plus 10.2 AFY or 88 AFY, not 124 AFY, as shown in MSR. That is a material difference. Again, new residential construction will use less water.

2. *Inclusion of the California Voting Rights Act (CVRA)*

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Respectfully,  
Henry Krzciuk  
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**From:** [Jim](#)  
**To:** [Morgan Bing](#)  
**Cc:** [Matthew McElhenie](#)  
**Subject:** Public Hearing 1/18 MSR Cambria comment/questions  
**Date:** Wednesday, January 17, 2024 2:05:10 PM

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## Public Hearing 1/18 MSR Cambria

Page 21 CCSD Land Use designations

CCSD Sphere of influence -

- When was the first mapping of these areas?
- What was the date of the last update to the Map?
- Who requested the inclusion on the map?
- The CCSD?
- The County?
- The property owners?
- LAFCO administratively?
- Other

Urban Reserve Line-

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- The CCSD?
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- LAFCO administratively?
- Other

Regards:

Jim Bahringer