

The Cambria Community Services District requests a change to its existing condition 10(d) on SWRCB permit 20387 due to this change being urgently needed; not causing injury to any other lawful user of water; the change being made without unreasonable effect upon fish, wildlife, or other instream beneficial users; and, the change being in the public interest. The following discussion further summarizes the CCSD's rationale on each of these points.

1. Urgent Need for Requested Change

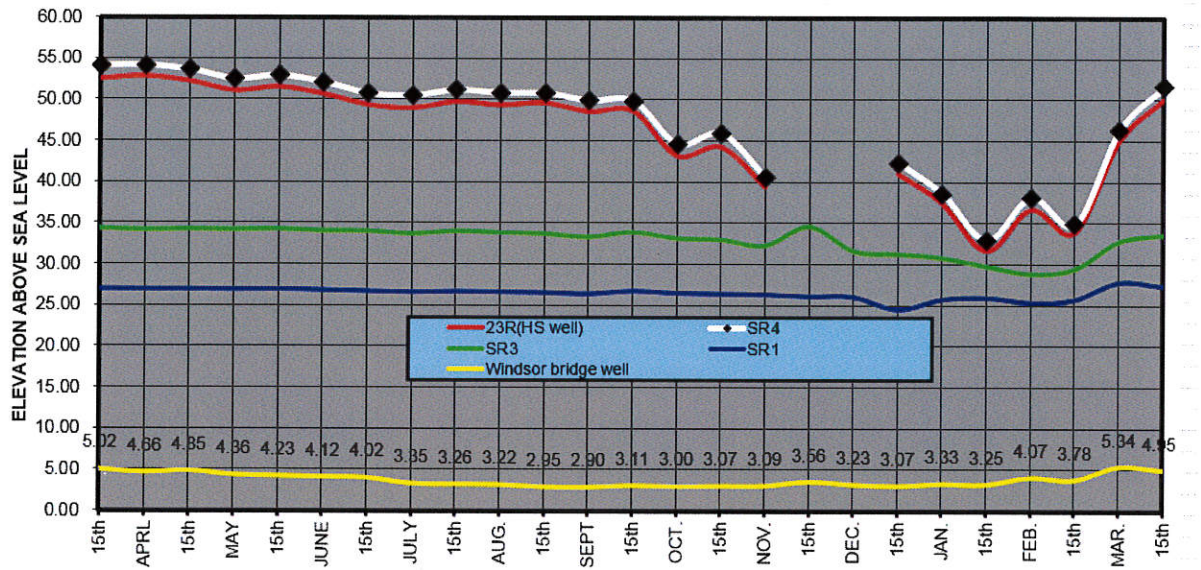
The Cambria area is on the central coast of California, which is under the most severe drought ranking issued by the National Drought Mitigation Center, "Exceptional Drought." Cambria is an isolated community along the coast and its water supply relies solely upon two coastal stream aquifers, which need seasonal rainfall to recharge each year. The most recent water year brought only 80 percent of the minimum amount needed to recharge the area's two seasonal coastal stream aquifers. These relatively narrow and thin aquifers can become depleted rapidly during late summer to late fall as the underflow ceases from upper springs within higher elevations in each watershed. Because there are no assurances that seasonal rainfall will occur early enough to recharge the local aquifers, the CCSD has invoked very aggressive, mandated conservation measures, while also completing an emergency water supply project. The emergency supply project is currently being fast-tracked to allow its operation by late October to early November of this year. Conservation measures are in place that include a prohibition on all outdoor water irrigation using potable water, limiting residential water use to no more than 50 gallons per person per day, reducing all commercial water use by 20 percent, and stiff penalties for not meeting conservation requirements.

The CCSD's emergency water supply project will be treating brackish water on CCSD property located off lower San Simeon Creek Road, which is about two miles north of Cambria. The brackish water will consist of a combination of creek underflow, treated wastewater effluent that has percolated through the ground, and a mixture of freshwater and saltwater from a lower saltwater wedge. Because this project must meet state standards for indirect potable reuse of recycled water, it is currently completing a 67 day tracer study from July 21, 2014 to approximately September 26, 2014. These study results will be used to verify that advance treated water takes at least 60 days to travel underground before reaching the CCSD's potable wells within its San Simeon Creek well field. To avoid delaying this test and possibly biasing its results, the CCSD plans to rely solely upon the Santa Rosa aquifer during this 67-day test period. Without completing the emergency water supply project, the Cambria community is at risk of running out of water.

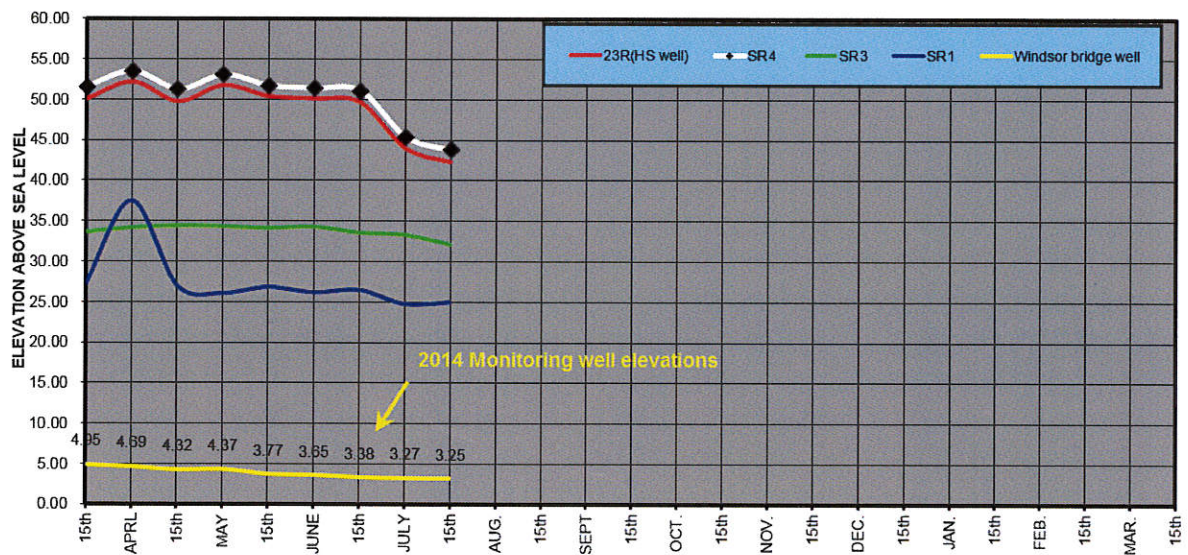
Based on observed monitoring wells and operations during the summer and fall period of 2013, the Santa Rosa monitoring well fell to its three-foot minimum during mid-August. At that time, the CCSD operations would include using its San Simeon well field. This allowed the Santa Rosa aquifer wells to recover slightly, which subsequently allowed restarting the CCSD's Santa Rosa well. Because of the current tracer study and the potential loss of creek underflow from the area's Exception Drought condition, the CCSD anticipates the monitoring well to again drop below the three-foot minimum criteria. Currently, the Santa Rosa monitoring well is a 3.25 feet above sea level. For this reason, the CCSD is requesting a temporarily allowance for the Santa Rosa Creek operations to occur with a two-foot monitoring well minimum. The following graphs show the Santa Rosa Creek aquifer well

levels during 2013 and 2014. The lower yellow line for the Windsor Boulevard Bridge well is the subject monitoring well.

2013 CCSD Well Level Data – Santa Rosa Creek Aquifer



2014 CCSD Well Level Data – Santa Rosa Creek Aquifer



2. Change Will Not Cause Injury to any Other Lawful User of Water

Wells with the nearest proximity to the monitoring well include a County-owned irrigation well (well 27S 08E 21R03), which is about 300 feet further down gradient from the monitoring well. The County well is used to irrigate Shamel Park, a county-owned and operated park that is located off of Windsor Boulevard in Cambria. The next closest well would be a privately owned well by Black, which is about 1.5 miles up gradient from the monitoring well. The Black well (parcel number 013-262-016) is used at a commercial lodging facility in Cambria's east village area. The change to condition 10(d) of only one foot on the monitoring well should not adversely impact either of these existing wells. In addition, no change is being requested existing conditions 10(b) and 10(c), which would remain in place, and were previously established to safeguard against saltwater intrusion.

3. Change May Be Made Without Unreasonable Effect Upon Fish, Wildlife, or Other Instream Beneficial Uses

The monitoring well elevation change to two feet from its existing three feet could have a short-term, temporary impact on pools near the Windsor Boulevard bridge area. On Thursday, July 17, 2014, CCSD staff observed the area immediately under the bridge as being dry creek bed with a pool located upstream from the bridge. Existing pools upstream and downstream of these areas would likely recede with the lowering of the shallow groundwater table in this area. During this same period, CCSD staff also measured the depth in the downstream lagoon at 3-feet 2-inches in depth within an area next to the Shamel Park. Because there was no continuity within the stream channel from the downstream lagoon to the pool area upstream from the bridge, it is assumed that fish species relying upon, or preferring the saltier environment of the lagoon water, would have remained in the lagoon area as the dry channel reach developed under the bridge.

Should the underflow of the existing Santa Rosa Creek channel cease due to the severe drought impacting the watershed, the entire reach of channel could conceivably dry out, including the downstream lagoon. Such dry lagoon conditions have occurred in the past during less extreme dry periods, as illustrated in the following Google Earth satellite images from June 3, 2003 and May 24, 2009. In comparison to the current three-foot minimum permit criteria, on June 3, 2003, the monitoring well was at 6.02 feet above sea level, while on May 24, 2009, the monitoring well level was at approximately 5.26 feet above sea level. From this past history, there is no assurance that maintaining the three foot minimum criteria in place during the current drought will ensure protection of the pooled water within the downstream lagoon area.

June 3, 2003 Google Earth image with Santa Rosa lagoon & upstream creek area in a dry state



May 24, 2009 Google Earth image with Santa Rosa lagoon & upstream creek area in a dry state



4. Change is in the public interest.

Because of the historic "Exceptional Drought" condition impacting the Cambria area, and the potential for the community to run out of water by year's end, relaxing the current 3-foot monitoring well level criteria is in the public interest. This request is also temporary, and requested over a period not to exceed 180 days. Because of the immediate need for regulatory relief to allow for the continuation of municipal water service to the Cambria community, the CCSD is urging the State to temporarily reduce condition 10(d) of permit 20387 from its current 3-foot minimum to a 2-foot minimum elevation above sea level.