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March 6, 2019

Via email and United States Mail

Jon Rokke, Water Resource Control Engineer  
Central Coast Water Board  
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San Luis Obispo, California 93401  
[Jon.rokke@waterboards.ca.gov](mailto:Jon.rokke@waterboards.ca.gov)

Re: Comment Letter—Cambria WDR Update

Dear Mr. Rokke:

I write to support Draft Updated Order No. R3-2014-0050 (the “Updated Order”) regarding the Cambria Emergency Water System (the “EWS”). I am a second generation Cambrian. My family has owned homes in Cambria since 1985. I am blessed to live in the County of San Luis Obispo and proud to be part of a long-standing family of tax and rate payers in this community. Issuing the Updated Order is in the interests of Cambria and San Luis Obispo County, and would further California public policy.

The Central Coast Regional Water Quality Board (the “Board”) should grant the update of the Cambria EWS water discharge and waste recycling permit. You no doubt have received many letters addressing Cambria’s water deficiencies both supporting the proposed update and in opposition. I will not restate what I believe is adequately addressed elsewhere.

Cambria’s water problems have adversely affected this community in several ways to include playing a material role in a severe shortage of affordable and low income housing. The Cambria Community Services District (the “CCSD”) largely has held new permits in abeyance for many years. This has restricted the market supply for rental units such that Cambria, for the first time in my memory, now commonly experiences multiple families, to include children, living in single unit housing, out on the street, on the banks of the river bed for the Santa Rosa Creek, on the Fiscalini Ranch Preserve, or in their cars. More than 90 students in our very small local school system have no homes. It now appears this soon may change. On February 28, 2019, the Cambria Community Services District Board of Directors voted unanimously to issue 57 water hook-up permits to supply water for affordable housing units to be built here. This is a huge step for Cambria to take because virtually no new water meters have been issued for residential purposes in Cambria since 2001.

The State of California has promulgated aspirational policies to address homelessness that are intended to encourage the development of affordable, low income housing. The affordable housing development has drawn objection in Cambria on the grounds that the community does not have the ability to provide an adequate supply of water for new housing while serving existing rate payers. While unquestionably there are hurdles to providing shelter and homes for those less fortunate than I am, I strongly believe that the ability to supply adequate, clean water should not be among them, in particular considering the means exist to resolve the problem should the need arise. As this Board appreciates better than anyone, providing clean water is a government function. This provides to the Board and to the county an opportunity to seamlessly support California’s public policy of increasing the supply of affordable housing by posturing Cambria to use its Emergency Water System (the “EWS”). I know of no more

honorable use of public accommodation than to encourage a supply of homes for those who have none, and that includes the availability of water. Passing the Updated Order will help bring this about.

Several of my fellow Cambrians have pointed out that the proposed updates to the Order are not needed because Cambria's EWS is not up and running, effectively mooted the issue of how to remove waste and the other questions the Updated Order is intended to address. Cambrians and this Board know too well that our community is just one dry year away from another Level 3 Water Emergency such as was declared in 2014. In this day of climate change and its symptom of unpredictable precipitation, the EWS needs to be ready to be used again on relatively short notice. It is unfair to expect this Board to stand by and await an emergency before it plays its own role in being prepared to address it. It is true that an emergency may arise sooner rather than later in light of the 57 new water permits. However, considering the means are in hand today to proactively address an emergency in Cambria, it would not in my humble opinion be an example of good government to wait until the inevitable exigency actually arises and then blithely hope for the best.

I also have learned that a contingent of Cambrians may oppose updating the Order because the emergency nature of the EWS is only a shield for broader development plans in Cambria. This, for some of my fellow Cambrians, warrants shuttering the EWS by any means necessary, to include declining to issue the Updated Order thereby permanently disabling the EWS, and opposing affordable housing. This is a red herring and, in any event, seeks to limit development in an off-point fashion by refusing to provide water. Whether the EWS may be turned on, or used more regularly, or become a means to provide water for increased development is an issue for another day and, perhaps, a different forum. The more focused, narrow and appropriate inquiry at this point is whether the EWS should be as well prepared to function as possible so that the EWS is able to play its role in providing water for everyone, including those who will live in affordable housing. I expect that preparing the EWS to function would help to resolve many of the more provincial objections to affordable housing now being raised in Cambria. Preparing the EWS to provide water by issuing the Updated Order would harmonize California's strong public policy supporting affordable housing with administering Cambria's EWS and need for affordable, clean water.

Based upon these factors, I request that the Board issue the Updated Order.

I am fully available to the Board at the contact points above to answer any questions or provide any data available to me. I plan to attend the May 10 Board meeting calendared to consider the Updated Order. Thank you, in advance, for your kind consideration.

Respectfully,

/s/ Mark D. Larsen

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