

**Cambria Community Services District Emergency Water Treatment Facility  
Title 22 Groundwater Replenishment Reuse Project  
Proposed Order No. R3-2019-0051**

**PUBLIC COMMENTS & CENTRAL COAST WATER BOARD RESPONSES**

*Comments are presented in the order in which they were received. Commenters who submitted letters during both comment periods will have individual comments numbered. These comments include comments received during two public comment periods April 8, 2018 and February 8, 2019.*

<b>Comments Received During 1st Comment Period - Beginning on April 8, 2018</b>		
<b>Mary Webb - Greenspace - The Cambria Land Trust - Comments</b>		
<b>Comment No. – Topic</b>	<b>Public Comment</b>	<b>Central Coast Water Board Staff Response</b>
<b>Greenspace No.1.1 - Request for delay</b>	As you may know, our Exec. Director is out on disability so I have been working almost full time at the Greenspace offices since January 10th of this year. We would very much appreciate it if this item were delayed until we have a chance to comment.	Request Granted. This item was postponed until the May 2019 Board meeting.
<b>Elizabeth Bettenhausen - Comments</b>		
<b>Bettenhausen No. 1.1 – Terminology</b>	Several phrases referring to the operating time period of the EWS plant need clarification. a. On p. 4 of MONITORING AND REPORTING PROGRAM NO. R3-2014-0050 (MRP), these phrases are used: · “Prior to startup of the Cambria Advanced Water Treatment Plant (AWTP)...” · “During the first year of operation of the Cambria AWTP” On MRP-9 appears this sentence, “CCSD shall take these samples monthly for the first year of Operation.” This footnote is another example of clarification needed on this point. “10 If no problem is detected, analysis of nitrogen can be reduced to weekly after 12 months of data collection” (MRP-16).	After the originally scheduled hearing for this item was postponed, the Monitoring and Reporting Program (MRP) was updated administratively on July 3, 2018. The proposed Order does not include MRP revisions.  Next time the MRP is updated, the language will be changed to clarify that "12 months" and "first year" means 12 cumulative months.

<p><b>Bettenhausen No. 1.2 – Terminology</b></p>	<p>On MRP-9 appears this sentence, “CCSD shall take these samples monthly for the first year of Operation.” This footnote is another example of clarification needed on this point. “10 If no problem is detected, analysis of nitrogen can be reduced to weekly after 12 months of data collection” (MRP-16).</p>	<p>See response to comment 1.1 above</p>
<p><b>Bettenhausen No. 1.3 – Accuracy of Statement</b></p>	<p>This statement is simply not true:        21. Time and Hours of Operation - The EWS typically operates 8-hours per day, 5-days per week for 6-months of the year when drought conditions are most severe. The facility may operate longer hours in the future, at the discretion of the Discharger”.</p>	<p>There are no Central Coast Water Board constraints on facility operation times contained in the proposed Order. The permit allows the EWS facility to operate continually or part time.</p> <p>Finding 21 has been modified to clarify that the facility "...has typically operated 8-hours per day".</p>
<p><b>Bettenhausen No. 1.4 – Staffing and Funding</b></p>	<p>One element of that greater concern has to do with fiscal responsibility of CCSD and adequate staff for this project. Since the Requirements under consideration include adequate funding and staffing, i how is “adequate” defined here and by whom?        The MONITORING AND REPORTING PROGRAM NO. R3-2014-0050 states, “ii. The OMMP includes staffing levels with applicable certification levels for facility operations personnel” (MRP-4).</p>	<p>The permit requires the CCSD to follow operator staffing requirements prescribed by the Office of Operator Certification at the State Water Resources Control Board in Sacramento. Adequate funding refers to the CCSD's ability to pay the required operational personnel, and the operating costs required to run the facility. Regarding the MRP, please refer to response Bettenhausen No. 1.1 above.</p>

<p><b>Bettenhausen No. 1.5 – Definitions</b></p>	<p>This is stated under Reporting Requirements: “4. The existing OMMP shall be updated to accurately reflect the operations of the Cambria AWTP, and the date the plan was last reviewed” (MRP-12).          Both “operational” and “changes” are vague. It is also not clear whether changes made that are “subject to an adaptive management plan” also therefore fall under the OMMP.          For example, “... water discharged to San Simeon Creek to prevent dewatering of the freshwater lagoon. The rate of discharge to the Lagoon is subject to an adaptive management plan, and may vary” (WDRWRR-9). “The rate of discharge into the Lagoon” is a major component of the EWS plant, but this is the only statement about the ADP (sic) in these documents.</p>	<p>This response assumes that the acronym "ADP" is a typo and that the commenter meant "AMP" referring to the Adaptive Management Plan. Requirements for an Adaptive Management Plan are contained in the OMMP, and includes ongoing groundwater, surface water, and biological monitoring to verify that sensitive habitats and federally listed species are not being adversely affected by project operations. The rate of mitigation discharge to the lagoon is determined by the Adaptive Management Plan.</p>
<p><b>Bettenhausen No. 1.6 – New Development</b></p>	<p>Thank you for continuing to use EWS as the name of this plant.          Is it the judgment of the RWQCB that the changing of the purpose of the plant by the CCSD and the production of more treated water will keep to the Requirements specified in the actions before the Board in June 2018? Now 3524 residential units are customers served. Does the addition of more than 1000 new residential connections and the consequent increase in water production stay within the Requirements approved in June 2018?</p>	<p>The Department of Drinking Water (DDW) permits the San Simeon well field's municipal supply wells. DDW staff have stated that they are working on modifying the permit for operating these municipal supply extraction wells to require that the combined pumping rate of the wells does not exceed 400 gpm while the EWS is in operation, and for 60 days after the EWS has ceased injecting advanced treated water. This is needed to maintain the required 60-day residence time before treated water reaches the municipal supply wells.</p>

<b>Bettenhausen No. 1.7 – SEIR</b>	CCSD’s Board certified a Supplemental Environmental Impact Report (SEIR) for this project on July 27, 2017. The SEIR contains project modifications including changing the purpose of the project from a facility intended for use during emergency drought conditions to supply water to existing residents of Cambria, to an everyday facility which would supply enough water to accommodate new development. The SEIR refers to the project as the “Sustainable Water Facility” instead of the “Emergency Water Supply” project. The updated Order continues to use the EWS nomenclature consistent with the Emergency Coastal Development Permit (SR-5)	The proposed Order permits discharges from the EWS, not the proposed Sustainable Water Facility. The proposed Order does not include the project modifications proposed in the SEIR. Any significant project modifications would need to be permitted through a new or revised WDR.
<b>Christine Heinrichs - Comments</b>		
<b>Heinrichs No. 1.1 - Delay Request</b>	I request that you postpone the Order and MRP	Request Granted. This item was postponed until the May 2019 Board meeting.
<b>Heinrichs No. 1.2 - Terminology</b>	I concur with Elizabeth Bettenhausen’s questions regarding the meaning of “first year of operation” and “startup date.” These points require specific meanings on which all parties are agreed. Her point regarding “typical” operation also needs explanation. The plant has not operated enough to characterize “typical” operation.	Re: first year language, see response to Bettenhausen No 1.1 Typical hours of operation described in the Order are based on the 277 days the EWS has operated.
<b>Heinrichs No. 1.3 - SEIR</b>	Changing the plant from an Emergency Water Supply project to a Sustainable Water Facility raises questions as to the adequacy of the SEIR. The project has only a permit as an Emergency project from the county. The issue of transitioning to a Sustainable facility to add residential users in Cambria remains unresolved.	See response to Bettenhausen No 1.7.
<b>Claudia Harmon - Comments</b>		
<b>Harmon No. 1 - Delay Request</b>	I respectfully request that the hearing be postponed until Mr. Rokke can be present for questions and to provide possible clarifications.	Request Granted. This item was postponed until the May 2019 Board meeting.

<p><b>Heinrichs No. 2 - Concern about CCSD Compliance with proposed 400 gpm Maximum Injection Rate</b></p>	<p>Regarding the requirement of pumping =&lt;400 gpm, many Cambrians are concerned about compliance. What assurances can the Water Quality Board give us that the CCSD will adhere to this requirement? Their track record is to violate and ask for forgiveness or file emergency permits after the damage has been done.</p>	<p>The CCSD is required to comply with all Treatment Specifications, Discharge Limits, General Requirements, Provisions, and Division of Drinking Water (DDW) requirements contained within adopted Orders. Regional Water Board staff review monitoring reports and conduct inspections to ensure compliance with all aspects of adopted Orders.</p> <p>Non-compliance is considered a violation of the permit and may subject the CCSD to enforcement actions and potential penalties for non-compliance.</p>
<p><b>Heinrichs No. 3 - Tracer Test is Not Accurate</b></p>	<p>The simulation tracer test is not accurate. We would ask that an actual tracer test be proven without modeling.</p>	<p>In addition to the physical tracer tests, tracer test modeling is reviewed, evaluated, and approved by DDW staff, as is standard practice when dealing with subsurface travel times.</p>
<p><b>Heinrichs No. 4 - Concern About Mitigation in ESHA Area</b></p>	<p>Protection of ESHA has not been accomplished and may not be possible with the proposed “emergency water plant” surrounded by endangered species and two creeks flowing into the nearby ocean. Flooding and contamination of the holding pond occurred with some mitigation after the fact. What exact mitigation will be required to assure the native plants, animal and marine life are not irreversibly compromised?</p>	<p>Environmentally Sensitive Habitat Area (ESHA) designation has recently been assigned to the entire project site by Coastal Commission staff. The adaptive management plan (AMP) includes ongoing groundwater, surface water, and biological monitoring to verify that sensitive habitats and federally listed species are not being adversely affected by project operations. Exact mitigation measures are a product of the AMP.</p>
<p><b>Leslie Richards - Comments</b></p>		
<p><b>Richards No. 1.1 - Delay Request</b></p>	<p>I respectfully request that you remove from the June board meeting agenda CCSD's order No. R 3 2014 - 0050 (update june 28, 2018), and bring it back later in the year for review.</p>	<p>Request granted. This item was postponed until the May 2019 Board meeting.</p>

<b>Tina Dickason - Comments</b>		
<b>Dickason No. 1.1 - Delay Request</b>	I would like to request that the proposed hearing date of June 28-29, 2018 be re-scheduled to a later date...	Request Granted. This item was postponed until the May 2019 Board meeting.
<b>Dickason No. 1.2 - Request to Include a Prohibition of Surface Impoundment Liquid to Percolation Ponds</b>	I would also request that the revised order, originally issued in November, 2014, be immediately modified to preclude the discharge of diluted reverse osmosis (RO) brine waste into the percolation ponds...	<p>The Central Coast Water Board met on December 7, 2017, and approved the discharge of wastewater blended from the Class II Surface Impoundment and municipal effluent from the CCSD's wastewater treatment plant (WWTP), as proposed in the Impoundment Basin Closure Plan – Revised. The discharge was authorized under General Waiver Resolution No. R3-2014-0041.</p> <p><a href="https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2014/low_threat_general/low_threat_general_permit.pdf">https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2014/low_threat_general/low_threat_general_permit.pdf</a></p>
<b>Dickason No. 1.3 - Noting The Phrase "periods of inactivity" is Vague and Ambiguous</b>	Page 5, new requirement #3 of the proposed order, would allow for the suspension of groundwater monitoring during "periods of inactivity" which is a vague and ambiguous term, left up to the discretion of the CCSD. It should be noted that even though the emergency Water Supply (EWS) plant is not currently producing water, RO concentrate is currently being percolated into leaking per ponds next to San Simeon Creek	<p>A search of the current proposed Order and the current MRP (revised July 3, 2018) reveals that the word "inactivity" does not currently appear in either document.</p> <p>Please see response to previous comment (Dickason No. 1.2)</p>

<p><b>Dickason No. 1.4 - Noting that staff report does not mention chlorine discharge to Creek</b></p>	<p>While it is true that the vast majority of these NOV's were due to late reporting or non-reporting (page 4 of staff report), the staff report fails to disclose that some of the NOV's were related to chlorine discharges, and the discharges of excessive levels of boron (from the RO concentrate) and nitrate to the perc ponds.</p>	<p>A single NOV was issued related to the discharge of chlorinated water to Van Gordon Creek on February 27, 2015. This violation led to the installation of the dechlorination system included in the proposed Order.          See response to comment Dickason 1.3 above regarding RO concentrate to percolation ponds.</p>
<p><b>Dickason No. 1.5 - Staff Report Misleads the Public</b></p>	<p>Page 2, paragraph 4 of the staff report, misleads the public into believing that chlorinated water has not yet been introduced into San Simeon Creek, by stating that "introducing chlorinated water into San Simeon Creek and Lagoon would violate WDR's." In fact, the CCSD did introduce chlorine into Van Gordon Creek, a tributary feeder into San Simeon Creek State Natural Preserve, and habitat for several federal and state listed species, which is documented in a NOV.</p>	<p>The cited language no longer appears in the current staff report.</p>
<p><b>Dickason No. 1.6 - Order Grants Discharger the Ability to Operate the EWS When They Choose</b></p>	<p>Page 8, Item 21 (paragraph 5) of the draft order proposes to generously grant the discharger the discretion to operate "the facility" for longer hours in the future...when "drought conditions are most severe." Item 21 is vague and ambiguous, insofar as it does not define which facility it refers to (EWS or SWF, or portions thereof?), and it does not define "longer hours" or define "when drought conditions are most severe." Does the Board intend to give the discharger the discretion to operate the "Emergency Water System" year-round, including during the rainy season when the aquifer is full?</p>	<p>The CCSD has always had the ability to operate the EWS facility under our Order during the hours of their choosing. The Emergency Coastal Development Permit has tied operations to a Stage 3 Drought emergency, but not so with either the Water Boards current or proposed Orders. CCSD may operate 24/7 as long as they remain in compliance with our Order(s).</p>

<p><b>Dickason No. 1.7 - What Effect will the Central Coast Blue Water Reclamation Project have on CCSD's Ability to Dispose of Brine Waste at SSLOCSD?</b></p>	<p>Since the decommissioning of the surface impoundment, ordered by the RWQCB, the CCSD will be required to dispose of all brine waste from the facility when operational, by trucking to an approved facility. The District has a contract with the South San Luis Obispo County Services District (SSLOCSD) to dispose of brine waste, but the facility's NPDES permit limits brine waste to 50,000 gallons per day and is on a first-come, first-serve basis. When the Reclamation Project in South County is completed, how will that project impact the SSLOCSD's NPDES permit, and the possible impact it may have on Cambria's ability to dispose of their brine waste at that facility?</p>	<p>The proposed Order does not require that CCSD dispose of the EWS wastes at SSLOCSD.          The proposed Order states under It Is Hereby Ordered, General Requirements V(1):          "Reverse osmosis concentrate and other cleaning wastes previously sent to the Title 27 surface impoundment will now be stored on-site in tanks which are either double-walled or are provided with secondary containment, before being trucked to an appropriately regulated disposal facility."          The choice of which appropriately regulated facility to use is up to the CCSD.</p>
<p><b>Dickason No. 1.8 - Commenter unconvinced by Tracer Studies</b></p>	<p>I have yet to be convinced of tracer tests conducted in late 2014 which did not pass, and again in fall of 2016, which passed from my understanding through "modeling."</p>	<p>Physical tracer tests, tracer test modeling is reviewed, evaluated, and approved by DDW staff, as is standard practice when dealing with subsurface travel times for projects as the EWS project.</p>
<p><b>Dickason No. 1.9 - Commenter not convinced EWS can Produce 250 acre feet in 6 Month period</b></p>	<p>I am also not convinced of the plant producing 250 acre feet. There has been no proof to date that the project can produce what it has been purported to.</p>	<p>Comment noted</p>
<p><b>Dickason No. 1.10 - Surface Impoundment Wet Weather Report Submitted Late</b></p>	<p>In regard to Wet Weather Preparedness, while the Staff Report, page 2,...refers to "design flaws" related to flooding in early January 2017, I would add that the District did not respond to the Wet Weather Preparedness notice from the RWQCB of September, 2016, which required a response by October 1, 2016.summer</p>	<p>Wet Weather Preparedness Report refers to a Title27 Surface Impoundment requirement and is not the subject of the proposed Order.</p>



<p><b>Dickason No. 1.11 - The Amount of Mitigation Water to be Sent to San Simeon Creek is Ambiguous</b></p>	<p>Page 2, #7 of the Draft Order, states:  <i>7. In addition to re-injection of 576,000 gpd of reverse osmosis (RO) water, the CCSD potentially supplies approximately 72,000 gpd of membrane filtrate (MF) product water to San Simeon Creek to prevent dewatering of the fresh water lagoon, and discharges up to 90,000 gpd of MF backwash to the CCSD percolation ponds.</i>  <i>The words "potentially" and "Approximately" are ambiguous in the above paragraph. What do they really mean? Where is the clarification for water to be supplied to the lagoon?</i></p>	<p>The amounts of mitigation water sent to San Simeon Creek are to be determined by the CCSD's Adaptive Management Plan and will vary over time, thus the lack of exact language.</p>
<p><b>Dickason No. 1.12 - The Discharger Should Have Paid More Attention to Agency Comments</b></p>	<p>Other regulatory agencies have raised issues related to the EWS. Please see the attached letter from the California Coastal Commission to the San Luis Obispo County Planning Department, dated February 15, 2018 (see Attachment 2, below). The issues raised in the letter have created a huge stumbling block in pursuing the regular CDP. CCSD's plan in attempting to resolve the issues, are again at a huge expense to ratepayers. It would have been far wiser for CCSD to have paid attention in July of 2014, when the Coastal Commission, as well as other regulatory agencies, including RWQCB and members of the public, who made very clear in their comments when responding to the Initial Study Mitigated Negative Declaration (ISMND) to the CCSD, issues that the CCSD chose to ignore, but which have become major stumbling blocks as the District attempts to obtain a regular CDP.</p>	<p>Comment noted</p>

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<b>Dickason No. 1.13 - Commenter Notes Uncertainty About Indirect Discharges to Waters of the U.S.</b>	Another issue I would like to bring to the Board's attention, and am attaching a report for your convenience, relates to the "Clean Water Act May Be Required for Pollution Discharged Indirectly into Navigable Waters." If the hearing is delayed, I would ask that the Board consider taking some time to look into this issue, as it would seem that at some point it will need to be addressed.	Comment noted
<b>Comments Received During 2nd Comment Period Beginning on February 8, 2019</b>		
<b>Edward &amp; Suzzane Siegler - Comments</b>		
<b>Siegler No. 1 -</b>	Approval of the Monitoring and Reporting Program at your May 9-10 meeting is an important step to support of our Coastal community.	No Monitoring and Reporting Program (MRP) is on the agenda for this proposed action. The MRP was updated administratively for the second time on July 3, 2018.
<b>Mike Lyons - Comments</b>		
<b>Lyons No. 1 - In Favor of Approval</b>	I ask for your solid vote during the May meetings in support of the changes that have been proposed for brine disposal and monitoring/reports of tests of the product of the EWS/SWF	Comments noted.

<b>Gregory Gordon - Comments</b>		
<b>Gordon No. 1 - In Favor of Approval</b>	As a Cambria homeowner, I am very concerned that Cambria be able to provide its residents with sustainable water for safety and health. There is an group of individuals in our community that are opposed to the Sustainable Water Facility. I can't really understand why anyone would oppose the assurance of adequate water. If they want to discourage growth, it seems like they could find other means than threatening a dangerous level of water scarcity. Please do not allow this small, but loud and active group of Cambrians to thwart the efforts to run the SWF, particularly in drought situations. I can see no reason not to allow it to run whenever needed. We have rain now, but we all know how quickly that water disappears without adequate storage in California.	Comments noted.
<b>Bradly &amp; Gina Zane - Comments</b>		
<b>Zane No. 1 - In Favor of Approval</b>	Please approve Update Order No. R3-2014-0050	Comment noted.
<b>Mark Landgreen - Comments</b>		
<b>Landgreen No. 1 - In Favor of Approval</b>	Sir, please take notice of the serious nature of Cambria's need for completion of our water project. It is imperative that it move forward, not just for daily needs, but for fire protection.	Comments noted.
<b>Alvin &amp; Claudia Solomon - Comments</b>		
<b>Solomon No. 1 - In Favor of Approval</b>	Both my wife & I are totally in support of Cambria's EWS project as well as the Draft Updated order No R3-2014-0050	Comment noted.
<b>William &amp; Eleanor Seavey - Comments</b>		
<b>Seavey No. 1 - In Favor of Approval</b>	I support the continued efforts to make Cambria's SWF fully functional by being able to transport brine to an outside location rather than the use of the ill designed pond.	Comment noted.

<b>Noel Schmidt - Comments</b>		
<b>Schmidt No. 1 - In Favor of Approval</b>	We have lived in Cambria for over 20 years and know that periodic droughts will occur. Cambria now has in place equipment to supply potable water during expected droughts. It is very important that the required permits are issued to insure that this equipment can be activated when additional water is needed or useful for the health and safety of Cambria's residents. It is very important to have water available for fire prevention (irrigation) and fire suppression in this area.	Comments noted.
<b>Mark Herrier - Comments</b>		
<b>Harrier No. 1 - In Favor of Approval</b>	These proposed updates to the EWS are needed and welcome. They have my complete support. They have the support of most everybody in this town. And I strongly urge you to support them as well.	Comments noted.
<b>Bill Thompson - Comments</b>		
<b>Thompson No. 1 - In Favor of Approval</b>	I request your support in earning approvals for a brine disposal tactic for our SWS.	Comments noted.
<b>Lonnie &amp; Gloria Coffie - Comments</b>		
<b>Coffie No. 1 - In Favor of Approval</b>	We need the EWS/SWF for our health and safety as this would do the following: (1) Provide a permanent water supply facility that could be operated to meet Cambria's water demands and improve overall supply reliability, year-round (2) Cambria would be safeguarded against water shortages and maintain its self-sufficiency. (3) Prevent the migration of secondary wastewater effluent into the San Simeon Creek well field production wells. (4) Relieve stress on both San Simeon Creek and Santa Rosa Creek, thereby protecting wildlife and providing a buffer for agricultural water use.	Comments noted.

<b>Peter Chaldecott - Comments</b>		
<b>Chaldecott No. 1 - In Favor of Approval</b>	During the threat of MTBE entering our drinking water from nearby gas storage tanks some years back, your RWQCB worked closely with my CCSD board towards a common sense solution which was much appreciated by us here. I urge your same diligence with a positive referral of the WDR update.	Comments noted.
<b>Arthur Chapman - Comments</b>		
<b>Chapman No. 1 - In Favor of Approval</b>	I read the Cambria WDR update, and strongly support Draft Order No. R3-2014-0050 for the Emergency Water Treatment Facility and Recycled Water Re-injection Project. This will allow the CCSD to apply to the County of San Luis Obispo for a permanent operating permit to provide a sustainable water supply during future droughts	Comments noted.
<b>David Sassaman - Comments</b>		
<b>Sassaman No. 1 - In Favor of Approval</b>	I am writing you to support the request that the Cambria EWS be operated as required at the local level with decisions to operate the EWS by decisions made by our local citizens.	Comments noted.
<b>Deryl Robinson, President, United Lot Owners of Cambria - Comments</b>		
<b>Robinson No. 1 - In Favor of Approval</b>	I am writing on behalf of the hundreds of owners of vacant homesites in Cambria. We have all been waiting for decades now for Cambria CSD to resolve its water supply issues and start again to allow new water and sewer connections...To that end, we are asking that your board follow the staff recommendation and adopt Order No. R3-2014-0050, allowing the change in how effluent is disposed of, and therefore allowing the plant to continue to operate and provide drought protection to the community.	Comments noted.
<b>Andy Pickar - Comments</b>		
<b>Pickar No. 1 - In Favor of Approval</b>	I urge the Central Coast Regional Water Quality Control Board to adopt the proposed Order in its entirety.	Comment noted.

<b>Charlie &amp; Linda Casale - Comments</b>		
<b>Casale No. 1 - In Favor of Approval</b>	We have been Cambria full time owners since 2013. We love our community and need your help in approving our Emergency Water Project to becoming a permanent water supply facility that can be operated year-round if needed during a drought.	Comments noted.
<b>Jack Posemsky - Comments</b>		
<b>Posemsky No. 1 - In Favor of Approval</b>	We have a desal plant now that can and will supply us with the water we need to sustain this town for the long haul. I ask that you please work with all agencies to permit this EWS so we can all move forward into the future with a reliable second source of water.	Comments noted.
<b>Sandra Cade - Comments</b>		
<b>Cade No. 1 - In Favor of Approval</b>	I moved to Cambria 2 years ago and at the time of my move, we were under drought restrictions. To this day, I am still very careful with my water usage because I understand how important it is for our community as a limited resource. However, like many other residents and lot owners (in addition to my home, I purchased a vacant lot so in full disclosure I am also on the water wait list), I am confident that the proposed solution, and the great efforts of bright minds will be able to address the water situation in a fair and open-minded manner.	Comments noted.
<b>Elaine Gullotta - Comments</b>		
<b>Gullotta No. 1 - In Favor of Approval</b>	As a lot owner in Cambria I'm very am aware of the water needs of our community and highly recommend that you approve the EWS Project, which includes approval of a new brine-disposal method per Draft Updated Order No. R3-2014-0050. My neighbors and I need will EWS/SWF to ensure that our health and safety is maintained in the years to come.	Comments noted.

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<b>Barbara Choate - Comments</b>		
<b>Choate No. 1 - In Favor of Approval</b>	As long-time Cambria property owners we are writing to express our very strong support for the RWQCB's proposed revisions to the Cambria Emergency Water Supply (draft updated Order No. R3-2014-0050). We earnestly hope that the RWQCB will approve the proposed revisions at its forthcoming meeting in May. They are very much needed.	Comments noted.
<b>Jim Anderson - Comments</b>		
<b>J Anderson No. 1 - In Favor of Approval</b>	The up-coming hearing concerning Cambrian's water supply is extremely important. I have lived here for 32 years and owned property since mid 1950s. Water has always been a problem. Please help us keep the SWF in use. Even without any growth we need a water supply we can count on for periods on drought and fire protection.	Comments noted.
<b>Lance &amp; Debbie Rossford - Comments</b>		
<b>Rossford No. 1 - In Favor of Approval</b>	I have decided to keep this email short as you have plenty to do and I can only hope the vote will pass.	Comment noted.
<b>Don Anderson - Comments</b>		
<b>D Anderson No. 1 - In Favor of Approval</b>	We need the EWS/SWF for our health and safety	Comment noted.
<b>Jim Murphy - Comments</b>		
<b>Murphy No. 1 - In Favor of Approval</b>	I am in favor of the Central Coast Regional Water Quality Control Board revising its rules to allow Cambria's Sustainable Water Facility to dispose of its brine by trucking it to a waste disposal site.	Comment noted.
<b>Pat Taylor - Comments</b>		
<b>Taylor No. 1 - In Favor of Approval</b>	I am writing to the board asking you to take appropriate action to insure that the EWS Project continues on its path to completion for this communities benefit.	Comment noted.

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<b>Mark &amp; Cathy Larsen - Comments</b>		
<b>Larsen No. 1 - In Favor of Approval</b>	I write to support Draft Updated Order No. R3-2014-0050 (the "Updated Order") regarding the Cambria Emergency Water System (the "EWS"). [2-page letter submitted]	Comments noted.
<b>Glenn Donaldson - Comments</b>		
<b>Donaldson No. 1 - In Favor of Approval</b>	Having read the Draft Update Order R3-2014-0050, I am in support of approving this Order for the benefit of continued operation of the EWS project in Cambria, California. I request a "yes" vote for approval of this Order Update.	Comments noted.
<b>Robert &amp; Susan Detweiler - Comments</b>		
<b>Detweiler No. 1 - In Favor of Approval</b>	Please accept this brief statement in support of approval of the proposed update to Order No. R3-2014-0050, which pertains to the waste discharge requirements and water recycling requirements for the Sustainable Water Facility in Cambria, CA.	Comments noted.
<b>Barbara Gray - Comments</b>		
<b>B Gray No. 1 - In Favor of Approval</b>	I am writing to encourage you to do everything possible to continue to ensure that Cambria's water security.	Comment noted.
<b>Lee &amp; Bonnie Mellinger - Comments</b>		
<b>Mellinger No. 1 - In Favor of Approval</b>	We need having a fully permitted Sustainable Water Facility. We support this update as the community has a very real urgent need for this facility. It needs to be available at all times. Please vote for this.	Comments noted.
<b>Bob Horvath - Comments</b>		
<b>Horvath No. 1 - In Favor of Approval</b>	I strongly urge your adoption of the revised waste discharge requirements as proposed.	Comment noted.
<b>Mark Rochefort - Comments</b>		
<b>Rochefort No. 1 - In Favor of Approval</b>	I respectfully urge the Board to adopt the proposed Order in its entirety. [5-page letter submitted]	Comments noted.



<b>Jim Fedele - Comments</b>		
<b>Fedele No. 1 - In Favor of Approval</b>	<p>I am on the CCSD water wait list. It is true that there is a shortage of water intermittently, but the real problem is political, recently a lot that has position number 122 on the CCSD list, sold for \$20,000. The political problems Have caused tremendous financial hardship.            Your typical CCSD waitlist lot is owned by A husband and wife. Mom and Dad!            Mom is well into menopause, and Dad? His prostate is the size of a beach ball, they are just hoping to get a few years in Cambria.            The political problem in Cambria is wrong! Cambria is like a private country club that does not allow blacks and Jews. I need you to use your influence to end this injustice.</p>	Comments noted.
<b>Mary Maher - Comments</b>		
<b>Maher No. 1 - In Favor of Approval</b>	<p>I fully support the proposed updates to the Regional Water Quality Control Board's (RWQCB) Order: Waste Discharge Requirements and Water Recycling Requirements for Cambria's water treatment facility.</p>	Comments noted.
<b>Bill Currin - Comments</b>		
<b>Currin No. 1 - In Favor of Approval</b>	<p>The EWS Project, conceived in the throws (sic) of a severe drought, benefits residents and the environment through its ability to adapt water supply to large year to year precipitation variations. For these reasons, I support Cambria EWS Project and the RWQCB recommendations</p>	Comments noted.
<b>Mel McColloch - Cambria Chamber of Commerce - Comments</b>		
<b>McColloch No. 1 - In Favor of Approval</b>	<p>Please find attached my letter representing our nearly 350 members supporting the approval of Order No. R3-2014-0050.</p>	Comments noted.

Proposed Order No. R3-2019-0051  
 Response to Comments

<b>Ron Keck - Comments</b>		
<b>Keck No. 1 - In Favor of Approval</b>	I ask that you please support CCSD and the update for the Cambria water facility, the facility that the community desperately needs and the majority support.	Comment noted.
<b>Don Sather &amp; Lee Oliphant - Comments</b>		
<b>Lee/Oliphant No. 1 - In Favor of Approval</b>	Thank you for your consideration of our support for this update.	Comment noted.
<b>Sharon Ellington - Comments</b>		
<b>Ellington No. 1 - In Favor of Approval</b>	I am writing in support of Draft Updated Order No. R3-2014-0050. I believe it is important for the safety and health of all Cambrians. I hope RWQCB will vote to approve this important update.	Comments noted.
<b>John &amp; Kern MacKinnon - Comments</b>		
<b>MacKinnon No. 1 - In Favor of Approval</b>	Please help the small town of Cambria to take a step forward to solving a problem that has gone on way too long. I hope we all can take some responsibility for the situation we find ourselves in and work together to find a solution.	Comments noted.
<b>Tom Gray - Comments</b>		
<b>Gray No. 1 - In Favor of Approval</b>	I have been closely involved with the EWS project, from its inception (as a consultant to the CCSD) to the current efforts to obtain a regular Coastal Development Permit for the project under the label of "Sustainable Water Facility." I am currently on the steering committee of Cambrians for Water, a group with more than 800 members that is committed to getting a regular CDP for the SWF on terms that allow its operation to the maximum benefit of the community. I believe that this group represents the opinion of most Cambrians, who want true water security. Approval of the updates would bring us all closer to that goal.	Comments noted.

<b>David Pierson - CCSD Board President - Comments</b>		
<b>Pierson No. 1 - In Favor of Approval</b>	At our recent regular board meeting held on February 28, 2019, the Cambria Community Services District, Board of Directors reviewed the draft update of the RWQCB Order No. R3-2014-0050, Waste Discharge Requirements (WDRs) and Waste Recycling Requirements (WRRS) for the Cambria CSD Emergency Water Treatment Facility and Recycled Water Re-Injection Project] and authorized me to send a letter of support	Comments noted.
<b>Tom Luster - California Coastal Commission Staff - Comments</b>		
<b>Luster No. 1 - ESHA</b>	<ul style="list-style-type: none"> <li>• Environmentally Sensitive Habitat: We request that you inform the Board that Coastal Commission staff has identified the facility site as an environmentally sensitive habitat area (“ESHA”). Under the Coastal Act and the County’s Local Coastal Program, only limited types of development are allowed in areas designated as ESHA. While the proposed Order does not contemplate placing additional structures at the site, the continued presence and operation of the facility creates ongoing adverse effects to ESHA that have not yet been fully evaluated or mitigated. We expect to address these and other concerns as the County’s review of the facility’s proposed coastal development permit continues.</li> </ul>	Central Coast Water Board staff will work with Coastal Commission staff on any needed permit modifications as a result of the proposed coastal development permit.

<p><b>Luster No. 2 - Request to Urge CCSD to Empty Pond Quicker</b></p>	<p>•Reducing adverse effects of evaporation basin: We request that the Board require or urge the CCSD to more quickly remove and truck waste from the facility's now-closed evaporation basin. The basin contains wastes that may be hazardous to avian wildlife, and although the basin has been in place for almost six years, including all or part of six breeding and nesting seasons, it has not included measures meant to prevent birds from using the basin. Site monitoring shows that the basin receives extensive bird use, so the continued presence of basin wastes represents an ongoing and unmitigated adverse impact. Although the CCSD has been steadily removing the waste for a number of months, the removal rate is not keeping pace with rainfall, so the amount of waste within the basin is now increasing instead of declining. We understand, too, that the basin has occasionally been (and is currently) out of compliance with the Board's requirement that there be at least five feet of vertical separation between the bottom of the basin and the underlying groundwater. This presumably creates an additional risk to nearby biological resources in the event of a basin leak, and provides an additional reason to empty the basin as quickly as is feasible.</p>	<p>Central Coast Water Board staff will continue to work with CCSD staff to get the evaporation basin empty as soon as possible. CCSD staff currently estimate it will be empty by the end of May 2019.</p>
<p><b>Karen Chrisman - Comments</b></p>		
<p><b>Chrisman No. 1 - In Favor of Approval</b></p>	<p>As a homeowner in Cambria, I am writing to express strong support for the Central Coast Regional Water Quality Control Board's (RWQCB) update of the waste discharge and water recycling requirements for Cambria's Emergency Water Supply project, Draft Updated Order No. R3-2014-0050. This water project will enable Cambria to maintain its self-sufficiency by providing a reliable water supply to meet our water demands and safeguard against water shortages.</p>	<p>Comments noted.</p>

<b>Christopher Lewi - Comments</b>		
<b>Lewi No. 1 - In Favor of Approval</b>	I urge the Water Board to amend its rules to allow Cambria's proposal to dispose of the wastewater brine by tanker truck. Denying that approval will essentially kill the water project, a result that could kill Cambria as well, at least kill any chance for Cambria to prosper in the coming years.	The proposed Order has been updated to require reverse osmosis reject and other wastewaters to be trucked offsite to an appropriately regulated disposal facility.
<b>Crosby Swartz - Comments</b>		
<b>Swartz No. 1 - Clarification Requested</b>	There are several references in the Draft Updated Order that specify pumping rates at well 9P7. A one million gallon per day pumping rate and an 852,000 gallon per day pumping rate are specified. These pumping rates have not been demonstrated or verified for extended periods of operation. A reduction of pumping rates may be necessary to maintain percolation pond water levels adequate to prevent seawater intrusion into the area. To avoid misinterpretation of these pumping rate numbers as guarantees of performance, we recommend adding a disclaimer that these numbers are design targets which will be verified during future operation of the facility.	The proposed Order limits the amount of advanced treated water that may be injected into the aquifer to 400 gallons per minute, regardless of possible 9P7 well pumping rates. Potential sea water intrusion into the aquifer will be evaluated and responded to via the Adaptive Management Plan.
<b>Swartz No. 2 - Request for Added Statement</b>	We also recommend adding a statement that not all of the treated product water injected at well RIW-1 is recovered by the production wells SS-1 and SS-2. The CDM Smith Groundwater Modelling Report estimated that 50 to 60 percent of the treated water is recovered at the production wells. The balance of the treated water flows away from well RIW-1 toward the percolation ponds. Adding this statement will avoid misinterpretation of the 400 gallon per minute (576,000 gallon per day) injection rate at well RIW-1 as a guarantee of additional water available to the CCSD potable water supply.	The 400 gallon per minute injection rate limit is necessary to ensure that the required 60-day residence time for advanced treated water is maintained. It is not intended to express the amount of treated water that will become available to the people of Cambria.  The staff report was updated to clarify the purpose of this limit.

<b>David &amp; Louise Boyd - Comments</b>		
<b>Boyd No. 1 - In Favor of Approval</b>	<p>We support the Cambria EWS/SWF to enable Cambria to have a viable water supply annually for drinking water and also for fire protection.</p> <p>We would appreciate support from the Board in the writing of the necessary up dated water discharge &amp; waste recycle requirements for the EWS/SWF.</p>	Comments noted.
<b>Sherwin &amp; Marilyn Rubin - Comments</b>		
<b>Rubin No. 1 - In Favor of Approval</b>	<p>We support the EWS Project. Cambria needs a reliable water supply. It should not have to face water shortages because of climate change effects. The SWF will help prevent seawater intrusion into production wells. It will also prevent subsidence of the San Simeon Creek aquifer. These are just some of the important effects.</p>	Comments noted.
<b>Mike Nielson - Comments</b>		
<b>Nielson No. 1 - In Favor of Approval</b>	<p>My wife Doris and I firmly support of the SWF to ensure a consistent water supply to all Cambrians. Yes, we've made expensive mistakes trying to do this in the past, but until we have a vast reservoir of water available, this is our best bet to be sure water continues to flow through our tap even in severe droughts.</p>	Comments noted.

<b>Iggy &amp; Suze Federoff - Comments</b>		
<p><b>Federoff No. 1 - In Favor of Approval</b></p>	<p>My wife and I have lived in Cambria for the past 30 years and were so pleased several years ago when the Cambria Community Services District took bold, positive steps to insure a continuous supply of potable water to the District's residents with the construction of the Emergency Water Facility. Now there are modifications to this facility made necessary with the passage of time and additional knowledge gained by the operators and approving authorities.            Whatever changes of a reasonable and prudent nature need to be made to our EWS, those changes need to happen to assure an eventual approval to operate the facility whenever the District deems it necessary — not just under emergency conditions.            My wife and I trust all involved in the process will work together to achieve a permanently permitted water facility.</p>	<p>Comments noted.</p>
<b>Diane Kubat - Comments</b>		
<p><b>Kubat No. 1 - In Favor of Approval</b></p>	<p>I urge the Water Board to amend its rules to allow Cambria's proposal to dispose of the wastewater brine by tanker truck. Denying that approval will essentially kill the water project, a result that could kill Cambria as well, at least kill any chance for Cambria to prosper in the coming years.</p>	<p>The proposed Order has been updated to require reverse osmosis reject and other wastewaters to be trucked offsite to an appropriately regulated disposal facility.</p>

<b>Stewart Edwards - Comments</b>		
<b>Edwards No. 1 - In Favor of Approval</b>	<p>Although very complex, one of the water system hang-ups is disposing of the collected brine from the EWF (Emergency Water Facility) located in Cambria. I understand that you are the individual that can approve trucking the brine waste to an authorized dump site. Not knowing what other layers of government bureaucracies must approve trucking innocuous waste across county and state roads, approvals for disposal of the waste and other unknown hurdles. What reason could you have for not approving the trucking of waste from our EWF? I hope that you will allow the trucking of Cambria's waste water to an approved facility.</p>	<p>Trucking EWS wastewaters to an appropriately regulated facility is specifically approved of in the proposed Order.</p>
<b>Robert Tieman - Comments</b>		
<b>Tieman No. 1 - In Favor of Approval</b>	<p>I strongly support the proposed Update of the project's water discharge and waste recycling requirements. ALL of the issues involved in the update are beneficial to the project as well as to Cambria water customers. In addition, I fully support future operation of the EWS facility and look forward to the day when Cambrians no longer have to wonder whether we will have enough water for daily consumption and health needs.</p>	<p>Comments noted.</p>
<b>Joan &amp; Bruce Linton - Comments</b>		
<b>Linton No. 1 - In Favor of Approval</b>	<p>We are writing you today to encourage your support for The Draft Updated Order No. R3-2014-0050.</p>	<p>Comments noted.</p>
<b>Frank Scozzari - Comments</b>		
<b>Scozzari No. 1 - In Favor of Approval</b>	<p>I submit this letter to express my support for the Emergency Water Supply Project (EWS). For decades, Cambria has suffered from a chronic shortage of potable water. Now another drought has ended, but it doesn't fix the town's long-term water issues. Fire and drought has been a never-ending threat for Cambria. A reliable supplemental water source can alleviate both of these issues, permanently.</p>	<p>Comments noted.</p>



<b>Nick Lyons &amp; Kathy Yurman - Comments</b>		
<b>Lyons / Yurman No. 1 - In Favor of Approval</b>	<p>As full-time residents of Cambria who have witnessed the long-running struggles to obtain a permanent water security solution, we want to voice our support for the Emergency Water Supply (also known as the Sustainable Water Facility). It is critical that our community get the permits required to run this facility as needed. We believe the EWS/SWF is a viable and environmentally sound solution to our need for a local, drought-proof source of water.</p>	Comments noted.
<b>Christine Heinrichs - Comments</b>		
<b>Heinrichs No. 2.1 - Tracer Studies</b>	<p>As the draft staff report states: An initial tracer study conducted in 2014 injected water at a rate averaging 437 gallons per minute (gpm) and concluded that the minimum 60-day residence time requirement for indirect potable recharge projects was not met. A second tracer study was conducted in the fall of 2016 using an average injection rate of 406.9 gpm. The second study concluded that the 60-day minimum residence time was met, and the Division of Drinking Water conditionally accepted the study in a letter dated October 10, 2017 provided that the injection of recycled water does not exceed 400 gpm. This updated Order includes the 400 gpm limit on recycled water injection.</p> <p>This presented an issue for me as to the responsibility of the contractor. My understanding is that typically, the contractor is responsible for its project meeting the required standards. In this case, the test parameters were changed slightly so that the plant's performance would meet the required 60-day minimum. Thank you for setting the limits that help this plant meet the requirements.</p>	Comments noted.

<b>Heinrichs No. 2.2 - Violations History</b>	<p>The staff report states: The CCSD has received numerous notices of violation related to since the Order was adopted in 2014. The majority of the notices of violations were related to late submittal and missing data in required monitoring reports. All monitoring reports required by Monitoring and Reporting Program R3-2014-0050 have been submitted on time since the January 2017 monthly monitoring report. It should be noted that the EWS was not operational during 2017 or 2018, and the CCSD has yet to demonstrate that it can meet all data requirements and reporting deadlines while the facility is operational.</p> <p>The District has hired a qualified engineer to manage the plant, with the expectation that, should the plant be operated, he will meet all required reporting. The compensation for this person is around \$200,000, an expensive employee for a small district serving only 4,300 connections.</p>	Comments noted
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<p><b>Heinrichs No. 2.3 - CEQA</b></p>	<p>The staff report states: CCSD’s Board of Directors certified a Supplemental Environmental Impact Report (SEIR) for this project on July 27, 2017. The SEIR contains project modifications including changing the purpose of the project from a facility intended for use during emergency drought conditions to supply water to existing residents of Cambria, to an everyday facility which would potentially supply enough water to accommodate new development. The updates to this Order do not include the project modifications described in the SEIR. Any significant project modifications would need to be permitted through a new or revised WDR. Exactly what will be included in the District’s application for a permanent Coastal Development Permit remains unclear to me. If it includes the Surface Water Treatment Plant, I expect an additional EIR will need to be written to evaluate that. The District has made clear that it intends to operate the plant to supply water to serve new connections, for growth. I remain concerned about this aspect of the plant.</p>	<p>The project modifications described in the SEIR are not authorized by the updates to this Order. Any significant project modifications would need to be permitted through a new or revised WDR.</p>
<p><b>Heinrichs No. 2.4 - New Requirements</b></p>	<p>The staff report: Updates to the proposed Order include:          1. A new limit of 400 gallons per minute maximum that can be injected into the aquifer.          2. Reverse osmosis reject and other wastewaters must now be trucked off-site to an appropriately regulated disposal facility.          3. Addition of a dechlorination system for treated recycled water which may now be employed to supplement the membrane filtrate water used for lagoon water mitigation.          These are sensible requirements to protect Cambria’s water. The financial impact is substantial.</p>	<p>Comments noted</p>

<p><b>Heinrichs No. 2.5 - Project Costs and Affordability</b></p>	<p>Decommissioning the Brine Impoundment Pond is now the subject of a \$3.5 million lawsuit filed by the District against the contractor. That may or may not result in any money returning to the district. It certainly results in ongoing legal expenses, which, according to the District's Expenditure Reports, total about \$27,000 thus far.</p> <p>This in addition to the \$9 million initial loan to construct it (repayment, including interest, around \$13.4 million), plus the \$4.3 million grant which was to be used to pay down the principle of the loan but instead used to pay additional expenses, plus the ongoing expenses for testing, payment of fines for reporting inadequacies, high salaries for engineers, and the continuing overhead for Cambria's District engineers and other staff.</p> <p>While the RWQCB's responsibility does not specifically include costs, California law AB 685 (September 2012), Water Code Section 106.3, includes affordability: "...every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes."</p> <p>Despite a second recent rate increase last year, Cambria struggles to pay for anything except this EWS. Further rate increases will be necessary, as the District is already stretched financially. If the plant is used for growth, as the District has expressed it wishes to, the rate increases mean that current residents are paying higher rates to provide water for future residents. I urge you to consider the financial impact this project has had on Cambria. It is a cautionary tale for other communities considering desalination facilities.</p>	<p>Comments noted</p>
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<b>Sandra Sterling - Comments</b>		
<b>Sterling No. 1 - In Favor of Approval</b>	Dear Mr. Rokke, this is to express my support for the Cambria California EWS/SWF plant on the central coast. While we have received much needed rain this season we know what it is like to experience severe drought. We as a community and I as a resident for over 50 years want to make sure we are prepared for the next dry period. Please join with us in making provision for a vital and necessary water plant in this area.	Comments noted.
<b>Blair &amp; Sana McCormick - Comments</b>		
<b>McCormick No. 1 - In Favor of Approval</b>	We are residents of Cambria for 32 years. In all of those years the argument over water has never stopped. The checks have continually out-weighed the balances. The District manager once pointed to a shelf full of binders in his office and said, "That's our \$10 million dollar collection. Failed attempts to provide water storage or some form of sustainable water for dry years. The Emergency Water Supply system on San Simeon Creek Road is the first chance we have to change this dilemma. Why is it that common sense is not part of the decision? Please do not allow another few million dollars be wasted.	Comments noted.
<b>Walt Andrus - Comments</b>		
<b>Andrus No. 1 - In Favor of Approval</b>	As a concerned citizen of Cambria, I would like to express my support for the update to the Emergency Water Supply(EWS) project These needed changes will help ensure the continuing viability of Cambria as a community by providing a sustainable, reliable and efficient use of our limited water resources. It will help prevent saltwater intrusion and help protect habitats for wildlife species in the San Simeon Creek Lagoon, as well as adding to water self-sufficiency to address local fire protection resources for homes and business'.	Comments noted.

<b>Nancy McLaughlin - Comments</b>		
<b>McLaughlin No. 1 - In Favor of Approval</b>	Cambrians are desperate for completion pf our SWF and hope you will support the proposed updates of water discharge and waste recycling requirements for Cambria’s Sustainable Water Facility. I strongly support the completion of the facility as well as a full use permit.	Comments noted.
<b>Lyn C Baker - Comments</b>		
<b>Baker No. 1 - In Favor of Approval</b>	I am writing to support the proposed changes for the update on water discharge and waste recycling for Cambria's sustainable Water Facility. My Neighbors and I feel strongly that this will result in a proactive response to out continuing water situation.	Comments noted.
<b>Gerald Wagner - Comments</b>		
<b>Wagner No. 1 - In Favor of Approval</b>	<p>With the Emergency Water Supply (EWS) project we have the opportunity to move off the water availability argument and address the real immediate needs of the community (sewage treatment plant upgrades, fire prevention and fire fighting capacity, environmental health of forest, streams and aquafers.</p> <p>And most importantly water availability for our citizens without the extreme quotes and restrictions. I'll never forget when one of out (sic) present CCSD boards members came in to a board meeting with a large wash bucket and told everyone that they should be showering in the bucket. I'm not sure what an 80 year is to do to empty a full bucket.</p> <p>It is time to put the EWS solution, that the majority of the community voted for and paid for in the past, and to move on. From there we can continue to look for ways to better it, over time, as we gain an understanding of its ACTUAL pros and cons not hidden agendas.</p>	Comments noted.

<b>Ron &amp; Lorraine Bates - Comments</b>		
<b>Bates No. 1 - In Favor of Approval</b>	This letter is in support of the proposed updates of water discharge and waste recycling requirements for Cambria's Emergency Water Supply (EWS) project. Please, help keep Cambria safe in any water emergency.	Comments noted.
<b>Disk Morse - Comments</b>		
<b>Linton No. 1 - In Favor of Approval</b>	As citizens of Cambria, we must and do accept the fact that we need water security and must augment our source of water to sustain our future as a viable town. It is therefore, mandatory for us to support the proposed updates of water discharge and waste recycling requirements for Cambria's Sustainable Water Facility. All activities necessary to insure proper brine disposal which you have approved and recommend for adoption are essential and I support them 100%. They are reasonable and allow us to continue toward our objective of being able to utilize the SWF that the overwhelming majority of our residents support wholeheartedly for the reasons stated above.	Comments noted.
<b>John Rumi - Comments</b>		
<b>Rumi No. 1 - In Favor of Approval</b>	I am writing in support of the Cambria Emergency Water Supply (EWS) also termed the Sustainable Water Facility (SWF). Not only has Cambria developed a modern desal-like solution to water shortage, we have also taken steps to restrict future population and housing growth even after we get more water. Cambria bought and retired the Fiscalini Ranch limiting development. The town supported limits on developing the Hearst Ranch. So much of the United States is unprepared for a future of changed climate and Cambria should be congratulated – not admonished – for dealing responsibly with a changing future.	Comments noted.

<b>Shale Hanson - Comments</b>		
<b>Hanson No. 1 - In Favor of Approval</b>	Although we have had a wet year here in Cambria, it is important that we can use our Desal facilities on a regular basis. To use only in an emergency is very inconvenient. The restricted water use in the emergency affects all Cambrians. Also I own a lot with a water position and it would be nice if my Daughter could build on it someday.	Comments noted.
<b>Clive Mettrick - Comments</b>		
<b>Mettrick No. 1 - In Favor of Approval</b>	While I have been away, I've been monitoring the weather in Cambria closely from a 1600-mile distance. We've had a bit of luck with the rain this year, and I'm very happy about that. However, we cannot count on such good fortune in the future. We have an Administration in Washington blind to the fact that man-made climate change is causing weather extremes, including exacerbating the droughts we will experience. We cannot rely on Washington for solutions to our problems. We need to make our own luck, and our best hope at this is pushing the peanut forward and getting the EWS a permanent permit. Please, PLEASE do whatever you can to keep this project on track. Listen to the RWQCB Staff's recommendations to keep us moving forward.	Comments noted.
<b>Robert Maston - Comments</b>		
<b>Maston No. 1 - In Favor of Approval</b>	I believe it is imperative that the new brine-disposal method be approved so that the EWS can operate. Without it, we will not have enough water to ensure the health and safety of our community.	The proposed Order has been updated to require reverse osmosis reject and other wastewaters to be trucked offsite to an appropriately regulated disposal facility



<b>Clyde Warren - Comments</b>		
<b>Warren No. 1 -Effect on Water Level When 2 Wells Operated at the Same Time</b>	<p>My interest in this project is that my irrigation well (9P2) is approximately 95 feet from the District's 9P7 production well for their EWS. It is slightly upstream from 9P7. During the initial testing and operation of the EWS, the water quality improved in my well. This is a good thing. In this "Draft Order No. R3-2014-0500" under, IV.RECYCLED WATER INJECTION SYSTEM, #24 Extration (sic) and Supply Wells, it describes the pumping rate of 9P7 at 591 gpm. My question is, what effect is there on the water level when I operate my well 9P2 at 275 gpm if we pump at the same time? I assume it is taken into consideration in an adaptive management plan?</p>	<p>Central Coast Water Board staff will contact CCSD staff with instructions to ensure that the Adaptive Management Plan includes environmental evaluations when both wells 9P7 and 9P2 are operated simultaneously. Coordination with CCSD on the commenters part will be required to time observations appropriately.</p>
<b>Constance Edwards - Comments</b>		
<b>Edwards No. 1 - In Favor of Approval</b>	<p>Although very complex, one of the water system hang-ups is disposing of the collected brine from the EWF (Emergency Water Facility) located in Cambria. I understand that you are the individual that can approve trucking the brine waste to an authorized dump site. Not knowing what other layers of government bureaucracies must approve trucking innocuous waste across county and state roads, approvals for disposal of the waste and other unknown hurdles. What reason could you have for not approving the trucking of waste from our EWF? I hope that you will allow the trucking of Cambria's waste water to an approved facility.</p>	<p>The proposed Order has been updated to require reverse osmosis reject and other wastewaters to be trucked offsite to an appropriately regulated disposal facility</p>

<b>Matthew Ortiz - Comments</b>		
<b>Ortiz No. 1 - In Favor of Approval</b>	<p>As a lot owner and future Cambrian I would implore the The (sic) Central Coast Regional Water Quality Control Board (RWQCB) to support the upcoming water project update on May 9 &amp; 10. This action would allow for a reliable water source for all Cambrians (sic) who would like a responsible build out plan. Support for the EWS project would allow Cambrians to have peace of mind during the next drought. It would prevent extreme water rationing measures. Please take the appropriate measures to mitigate the impact that a drought can have on the Cambrian community</p>	Comments noted.
<b>Steve Ode - Comments</b>		
<b>Ode No. 1 - In Favor of Approval</b>	<p>I know that the RWQCB will soon be voting on an update of the water discharge and waste recycling requirements for the Sustainable Water Facility (SWF) of Cambria, aka the Emergency Water Supply (EWS) Project. My understanding is that the update is known as Draft Updated Order No. R3-2014-0050. As a property owner in Cambria since 2003, I am writing to express my strong support of approval for the proposed update...As you probably know, those of us on the CCSD wait list have been dutifully paying annual property taxes for many years while waiting for a sustainable water supply that will enable us to get permission to build on our properties. My wife and I have been waiting for 16 years. We are entering our retirement years, and are still hoping to be permitted to build our retirement home in Cambria. How much longer do we have to wait?</p>	Comments noted.

<b>Ted Key - Comments</b>		
<p><b>Key No. 1 - Sodium Bisulfite is a Known Toxin to Fish</b></p>	<p>First, the amounts of hazardous chemicals that are going to be included in the water used to mitigate the extraction from the San Simeon Lagoon: Sodium Bisulfite is a known toxin to fish. Using Sodium Bisulfite in the de-chlorinating process will introduce cumulative amounts that will surely be deadly to newborn fish in the nursery. I am aware that ordinance allows for these low levels to be released, but we do not know yet how the dewatering of the Lagoon will affect that threatened species habitat and we do know that the chemistry will accumulate given the volume of 57,000 gallons each operation day for six months each year.</p>	<p>Sodium Bisulfite (SBS) will be used to remove residual chlorine from disinfected advanced treated water should the need arise, and only if the volume of available MF water is insufficient to mitigate San Simeon lagoon water level drawdown. SBS is routinely used to remove excess chlorine in both wastewater and drinking water around the country. Ensuring that SBS is not used in excess, as with all treatment process chemicals, is the responsibility of the system operators and is a routine part of their job. Surface impoundment water and blended effluent were both recently tested by the SLO County water quality lab and both tests showed 0 mg/L of SBS.</p>
<p><b>Key No. 2 - Chemicals in MF Flush Water</b></p>	<p>In addition, placing MF system flush water into the earthen percolation ponds allows for seepage, and subjects the local area to dangerous chemical accumulations over time. I will not discuss each of the other chemicals, as their MSDS points out the dangers in them. We do not yet know what chemicals are used for the de-scaling.</p>	<p>Membrane Filtrate flush water, or backwash water contains no chemicals or additives other than those already present in the source water pumped from well 9P7. The MF backwash water sent to the percolation ponds contains inert particulates, organic particulates, colloidal particulates, pathogenic organisms, bacteria, and other particles excluded by the membrane based upon the size of the particles. All of the excluded materials were already present in the groundwater, and therefore no new dangerous chemicals will accumulate over time.</p>

<b>Key No. 3 - How Can We Trust CCSD?</b>	Cambria CSD has an epic record of failure to create reports and due diligence on this project. How can we trust that more failures won't occur and that the CCSD will report/respond to them in a timely manner such as the effluent pond failure reported by a citizen that forced their report? Our town nearly lost our water source with MBTE intrusion and now we're contemplating these risks. There's no room for error in our fragile environment!	Central Coast Water Board staff will continue to monitor CCSD's compliance with the Order, including reporting requirements and follow through with enforcement, if appropriate.
<b>Key No. 4 - How Can We Trust CCSD?</b>	This AWTP is absolutely and Emergency State Three drought system. It should be operated only under those conditions. We must only subject these delicate ecosystems minimally.	See response to Dickason 1.6 above.
<b>Key No. 5 - In Favor of Approval</b>	Again, I support the changes your board suggests and know that none of this changes shuts the system down permanently.	Comment noted.
<b>Mary Webb - Greenspace, the Cambria Land Trust - Comments</b>		
<b>Webb No. 2.1 - CCSD Took Advantage of Drought Emergency to Avoid CEQA</b>	Taking advantage of the Governor's suspension of the California Environmental Quality Act (CEQA) during this time, and even though well levels were above historical average, the Cambria CSD claimed that Cambria would run out of water and immediately declared a Stage 3 water emergency to avoid CEQA on an ill defined project that has yet to be fully and appropriately permitted. At the time, San Simeon and Santa Rosa Creeks were listed in the CASGEM as being "very low priority" in the 2014 drought. Santa Rosa Creek was listed at #403 of 515 basins State Wide, and San Simeon Creek was listed as #512 very low priority out of 515 basins. Yet the Cambria CSD was allowed to start construction on an emergency brackish water, reverse osmosis desalination plant located between two coastal creeks that contain threatened and endangered species, in highly protected areas surrounded by CA State Parks campgrounds with no Environmental Impact analysis and only the Central Coast Regional Water Board permits in hand.	Comments noted.

<p><b>Webb No. 2.2 - Project is Too Costly</b></p>	<p>Regional board staff hours and ratepayer increases continue to add up month after month, year over year even though the project remains idle. Environmental justice is a consideration today, but cost was not considered at the time this project was being allowed. Although Cambria is considered a very wealthy community, many of our residents live below the poverty line working in hotels, motels, restaurants that serve the tourism industry and many residents are elderly relying on monthly social security checks. The cost of this project has ballooned to \$20 million or more and rising with operation costs of hundreds of thousands per year even though the project is idle.</p>	<p>Comments noted.</p>
<p><b>Webb No. 2.3 - Hauling Brine has not Received Environmental Review or Cost Analysis</b></p>	<p>Construction on this public works project continues to this day due to the many violations it has received requiring revisions including adding a dechlorination system, removing the multimillion brine waste evaporation pond and hauling the brine waste to an “appropriately regulated disposal facility”; a plan which has also not received an Environmental Review or cost analysis.</p>	<p>Comments noted.</p>
<p><b>Webb No. 2.4 - Surfrider Concerns re: Trucking Impacts and Additional Flows to South County Sanitation Outfall (sent 11/26/18 to DeSimone)</b></p>	<p>[2-page Letter]</p>	<p>The Surfrider letter was written regarding Draft Order No. R3-2019-0002, South San Luis Obispo County Services District reissuance of Waste Discharge Requirements, not for this proposed Order. The Surfrider letter will be entered into the administrative record.</p>

<p><b>Webb No. 2.5 - Request Board Confirm Project to be Operated in Stage 3 Drought Emergency Only</b></p>	<p>We ask that the Regional Board confirm that the project is an “Emergency Water Project”, which is only permitted to run during a CSD declared Stage 3 Water emergency (as defined in CSD ordinances as of January of 2014), for existing customers only and that it is not a project that will allow new water connections to a system that has been unreliable since 1999. This project has not been proven to provide water during an actual emergency for existing customers only for 6 months during an actual drought.</p>	<p>See response to Dickason 1.6 above.</p>
<p><b>Webb No. 2.6 - Concern the Project will Lower the Water Table and Stream Flow in San Simeon and Santa Rosa Creeks resulting in "Take" of Endangered Species</b></p>	<p>As your staff report indicates, the rate of pumping that can be allowed continues to be reduced from 437 gallons per minute (gpm) to 406.9 gpm to only 400 gpm in today's report to avoid impacts to the environment. Our organization is very concerned that if the project is allowed to serve new connections it will lower the water table and stream flow in both San Simeon and also to Santa Rosa Creeks which could result in unpermitted ‘take’ of endangered species, subsidence and resulting aquifer collapse.</p>	<p>Please see response to Bentenhuisen 1.6 above.</p>
<p><b>Webb No. 2.7 - Failure to Obtain CDP has Resulted in Harm to ESHA</b></p>	<p>Greenspace is very concerned about the Cambria CSD's continued failure to obtain a regular Coastal Development Permit on this project, which should have been done within 30 days of receiving Emergency Permit ZON2013-00589 in May of 2014. This five-year delay has resulted in serious, ongoing, unmitigated harms in this ESHA environment surrounding the plant, to the watershed, wildlife and habitat as well as to visitors at CA State Parks and the surrounding camping and ranch areas. We believe that the environment and coastal creeks will only be protected through the process of obtaining the regular Coastal Development permit and a regular environmental review process that should be mandatory for any multi-million dollar public works projects such as this.</p>	<p>Comments noted.</p>

<b>Webb No. 2.8 - Request that Regional Board Require New Permits &amp; EIR if District Allows New Water Connections to the System</b>	Greenspace requests that your agency require the Cambria CSD to apply for new permits from the Regional board and an Environmental Impact Report if they pursue a project that would allow new water connections to this system.	The purpose of the proposed Order is to protect water quality in the San Simeon aquifer a source of municipal potable water for the town of Cambria. The Order does not regulate the number of water connections the CCSD allows. The request that new water connections by CCSD trigger new regulatory action(s) is beyond the scope of the proposed Order and our authority. Please see Bettenhausen No. 1.6 response above.
<b>Nancy Rentler - Comments</b>		
<b>Rentler No. 1 - In Favor of Approval</b>	As a property owner in Cambria, I am writing you today to express my support for the proposed updates of the water discharge and waste recycling requirements, and the continued operation of the Emergency Water Supply (EWS) project, more recently referred to as the Sustainable Water Facility (SWF).	Comments noted.
<b>Phil &amp; Becky Robnett - Comments</b>		
<b>Robnett No. 1 - In Favor of Approval</b>	My wife and I urge the approval of the proposed updates and changes for the ongoing operation of our Cambria Emergency Water Supply Facility.	Comments noted.
<b>Betty &amp; Ron Swierk - Comments</b>		
<b>Swierk No. 1 - In Favor of Approval</b>	We support going forward to complete the EWS, including solving the brine pond issue.	Comments noted.
<b>Judith Pratt - Comments</b>		
<b>Pratt No. 1 - In Favor of Approval</b>	I am in favor of the proposed updates of water discharge and waste recycling requirements in order to keep our SWF functioning.	Comments noted.

<b>Leslie Richards - Comments</b>		
<b>Richards No. 2.1 - CEQA Review</b>	<p>Prior to my retirement to Cambria, I reviewed numerous CEQA related documents, including Tiered, Program EIR's similar to CCSD SEIR approved by the RWQCB and now attached to this revised order. It is my opinion that RWQCB has erred here in their acceptance of this flawed document. Critical data is missing or contradicts earlier assumptions about the EWS project. This mis-information does not allow responding agencies to have the resources available to make accurate judgements about the overall impacts of the EWS project. That is exactly why it was left out in the first place. For RWQCB to accept this flawed document and endorse the current project is negligent. The current 3rd tiered off of the original 2008 Water Master Plan Programed EIR, and is referred to by the district as a "hybrid approach" which stands for a bastardization of the total process by combining two very flawed reports together, and does not constitute appropriate CEQA protocol. This is referred to as "piece-mealing", or "patch working" of a CEQA document and is strongly discouraged by the rules of process. The original administrative EIR draft for the EWS was circulated in October 2014 and garnered so much negative press that the CCSD hastily pulled it. CCSD then did a full pivot and changed focus of the EWS project from Emergency Drought contingency to a full blown, in ground, public works water project, specifically for growth and development. To state in your order that the EWS is the SWF is misleading and a re-creation of the projects historical record. I strongly object to this wording in the order, and if it remains, will be compelled to appeal the final decision of the RWQCB Board, if it is approved.</p>	<p>Comments noted.</p> <p>Regarding "piece-mealing", appellate courts have long wrestled with application of the relevant legal principles, which essentially attempt to prohibit a lead agency's "chopping up" of a project into smaller components so that it can turn a "blind eye" to reasonably foreseeable environmental impacts of the "whole" action.</p> <p>In accordance with CEQA Guidelines 15378(a), the Project must consist of the whole of the action. Piece-mealing phases of projects is discouraged by CEQA. Therefore, the entirety of the Project was presented in the DSEIR; The Project Description included a thorough description of the Sustainable Water Facility, as well as potential SWF project modifications. The Order includes requirements for the current EWS project not the SWF project. If CCSD moves forward with modifications to the current project (i.e., SWF) the Order will need to be updated/revised.</p> <p>Having multiple iterations of an EIR prior to adoption does not constitute piece-mealing.</p>



<p><b>Richards No. 2.2 - Previous CCSD Board Corrupt &amp; Project Costs Now Top 17 Million Dollars</b></p>	<p>Cambria citizens through a legal 218 vote, approved a skid loaded, temporary rental RO unit, at the cost of 3.5 million dollars, to supply emergency backup water for the current residents, only. Now, through bait and switch tactics, performed by a previous corrupt CCSD Board, we have this monstrosity of a project, currently topping 17 million and counting, with no end in sight.</p>	<p>Comment noted</p>
<p><b>Richards No. 2.3 - SEIR Mitigation Measures Lacking</b></p>	<p>The mitigation measures in this current SEIR are incomplete and sorely lacking in quantitative baseline data.</p>	<p>Comment noted.</p>
<p><b>Richards No. 2.4 - Adaptive Management Plan May Result in Dead Endangered Species</b></p>	<p>The AMP is a flawed series of non-confirmed assumptions. Literally, in a nut shell it states, 1. Run the SWF. 2. Kill protected endangered species. 3. Monitor and document these die offs. 4. Analyze the cumulative data points. And 5. At the end of each operational year, prescribe changes to the operational protocols to avoid ADDITIONAL endangered species die offs, in the future.</p>	<p>The Adaptive Management Plan specifies in Section 4.6:        "In order to determine the point at which creek outflow may be adjusted or other management actions may be implemented to avoid impacts to listed species, it is necessary to determine the thresholds at which the potential for an adverse impact would need to be evaluated. Unless otherwise attributable to natural causes, or anthropogenic activities by riparian users upstream and apart from the CCSD controlled property within the watershed (e.g., an agricultural accident leading to a chemical spill), should any of the following conditions be documented during regular surveys or otherwise during creek monitoring, management actions shall be required:</p> <ul style="list-style-type: none"> <li>· Unexplained deaths or die-offs of tidewater goby, steelhead trout, and/or California redlegged frog;</li> <li>· Early closure of the San Simeon Creek Lagoon sandbar due to dropping water levels;</li> <li>· Failure of California red-legged frog egg</li> </ul>

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		<p>masses due to desiccation;</p> <ul style="list-style-type: none"><li>· Unexplained changes in population levels of these species;</li><li>· Project-related drop in groundwater levels below previous historic minimum levels causing impacts to riparian habitat;</li><li>· Decrease in lagoon surface water levels below historic minimums."</li></ul> <p>Staff notes that ADP's by design are evolving documents that improve over time and offer no guarantees that endangered species die-offs will not occur.</p>
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<p><b>Richards No. 2.5 - Adaptive Management Program Does Not Meet Requirements</b></p>	<p>The CCSD, to date has not completed the following in regards to the AMP.</p> <ol style="list-style-type: none"> <li>1. No consistency determination.</li> <li>2. No Federal Habitat Conservation Plan.</li> <li>3. No Incidental Take Permit or exemption.</li> <li>4. No Biological Opinion from 4 lead agencies.</li> </ol> <p>Federal Guidelines specifically state that strict monitoring protocols must be applied and followed, which the AMP lacks. I personally have had first hand experience with this lack of mitigation measures when I documented the environmental damage caused to the lagoon during the second tracer study. CCSD staff and or their hired biologists was required to do visual monitoring of the Lagoon, to determine if the excessive pumping regime for the second tracer study was doing harm to the lagoon habitat due to draw down. Over the course of the entire study, since no staff worked weekends, the tracer study was on autopilot between Friday evening and Monday mornings . On Sunday afternoons, with permission of State Parks, I stationed myself at the monitoring point and at no time saw any CCSD staff. I documented the repeated dewatering of the lagoon, and sent out the real time photos to the responsible agencies, including RWQCB, with no response! What good are monitoring and mitigation programs when there is no over site or enforcement when they fail?</p>	<p>Comments Noted.</p> <p>Adaptive management is a structured, iterative process of robust decision making in the face of uncertainty, with an aim to reducing uncertainty over time via system monitoring. In this way, decision making simultaneously meets one or more resource management objectives and, either passively or actively, accrues information needed to improve future management. Adaptive management is a tool used not only to change a system, but also to learn about the system. Because adaptive management is based on a learning process, it improves long-run management outcomes.</p> <p>The adaptive management plan employed by CCSD with regard to San Simeon Creek and lagoon is not required to abide by federal guidelines or monitoring protocols.</p>
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<p><b>Richards No. 2.6 - Human Right to Water States that Water Must Be Clean and Affordable. CCSD Provided Water Is Not Affordable to Many in the Community</b></p>	<p>Implementation of Water Code 106.3                  In 2015, the State Water Board documented the statewide implementation of HRTW.* CCRWQCB referenced Cambria’s EWS in three separate areas of the survey to show the inclusion of HRTW in their permitting process. Page 10, line 1, states "Cambria EWS permit to provide continued access to water for Cambria residents during drought." * Currently, RWQCB staff contend that Water Code 106.3 does not apply to the Cambria because we are a "wealthy, beach front community".                  Since Water Code 106.3 is referenced in this update to the original order, discussion of what constitutes "affordable" should be allowed.                  55.4% of Cambria residents are currently struggling to make ends meet, financially. That includes paying the exorbitant water bills, which have doubled since the inception of this disastrous water project. Millions of dollars are being funneled to the EWS while critical infrastructure needs are not addressed...Cambria now has the privilege of being the most expensive Desal water project in American history. How can RWQCB staff claim that Water Code 106.3 does not apply here? 50% of Cambria residents can not afford the EWS project. Period.</p>	<p>The EWS project was originally permitted during a period of prolonged drought, during which the CCSD made the determination that this project was the best way to continue to assure that the Cambria community had access to safe, clean, and accessible water. This action was consistent with the Human Right to Water requirement enshrined in Water Code Section 106.3.</p> <p>Proposition 218 specifies that a 50% + 1 majority of affected area residents and property owners may petition to block proposed rate increases.</p> <p>In October 2018 such a rate increase was proposed by the CCSD and efforts to stop the increase failed to garner the 50% + 1 protest signatures. This process was the legal mechanism for affected citizens to democratically stop the higher rates proposed by CCSD.</p>
<p><b>Richards No. 2.7 - DOF 2018 Audit Concludes that CCSD Has Not Tested Whether EWS Can Produce 235-250 Acre Feet of Water In A 6-Month Period</b></p>	<p>Also, Department of Finance, Audit of May 2018,* concerning the 4.3 IRWM Prop. 84 grant program concluded in Finding 2. "The EWS is a non-operational project and to date CCSD has not tested whether its modified plant will be able to produce the requisite amount of water ". DWR requires confirmation of this in a timely manner. If the EWS fails to produce 235 - 250 acre feet of product water for the Cambrian residents, CCSD is required to refund the 4.3 million dollars to the County of San Luis Obispo, Dept. of public works.</p>	<p>Comment Noted</p>

<p><b>Richards No. 2.8 - Various Requests</b></p>	<p>My request to the RWQCB Board is simple. Stop. Shelve this Order Update until the CCSD:</p> <ol style="list-style-type: none"> <li>1. Completes the regular Coastal Development Permit, with requisite EIR addendum.</li> <li>2. Finish the closure plan for the now condemned Brine impoundment.</li> <li>3. Allow for a community wide 218 vote so the residents of Cambria can choose which direction they want to go with the future of this water project. Whether it be only for emergency drought conditions or to be used for growth and development.</li> <li>4. Guarantee that all future mitigation measure required by the SEIR be completely funded and operational BEFORE expansion of the water project is allowed to proceed. This includes not just the AMP but the BUILD OUT REDUCTION PLAN as well.</li> </ol>	<p>Shelving the proposed Order would leave the current Order in force, which does not limit advanced treated water injection rate to 400 gpm, allows RO condensate disposal to the surface impoundment, and does not acknowledge the addition of the de-chlorination system.</p> <p>It is not reasonable to delay adoption of the above noted to requirements until: 1) the completion of a regular CDP, 2) finishing the surface impoundment closure plan, 3) a proposition 218 vote, or 4) guarantee of funding for all future mitigation measures, waiting for all future mitigation measures to become operational, or to tie this Order to the Build Out Reduction Plan. The purpose of the proposed Order is to protect water quality and the update will allow enforceability of the maximum injection rate.</p>
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<b>Tina Dickason - Comments</b>		
<b>Dickason No. 2.1 - Human Right to Water</b>	<p>According to California Water Code 43, “every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking and sanitary purposes.” In California Water Code 44, “discharges of waste into waters of the state are privileges, not rights. Nothing in this Order creates a vested right to continue the discharge.”</p>	<p>The EWS project was originally permitted during a period of prolonged drought, during which the CCSD made the determination that this project was the best way to continue to assure that the Cambria community had access to safe, clean, and accessible water. This action was consistent with the Human Right to Water requirement enshrined in Water Code Section 106.3.</p> <p>Proposition 218 specifies that a 50% + 1 majority of affected area residents and property owners may petition to block proposed rate increases.</p> <p>In October 2018 such a rate increase was proposed by the CCSD and efforts to stop the increase failed to garner the 50% + 1 protest signatures. This process was the legal mechanism for affected citizens to democratically stop the higher rates proposed by CCSD.</p>
<b>Dickason No. 2.2 - Inability of CCSD to Meet RWQCB Requirements</b>	<p>In the case of the Emergency Water Supply (EWS) project, I have concerns as to whether the Cambria CSD is actually capable of providing the community with safe, clean, affordable and accessible water from the EWS facility. The District has demonstrated on numerous occasions since the implementation of the EWS, their inability to meet the requirements of the RWQCB, as well as other agencies in a timely, reliable and responsible manner. (The RWQCB’s NOV’s attest to the above).</p>	<p>Central Coast Water Board staff will continue to oversee the proper implementation of the permit conditions and consider enforcement if CCSD is out of compliance.</p>

<p><b>Dickason No. 2.3 - Is Project Capable of Producing 250 Acre-Feet Within a 6-Month Dry Period?</b></p>	<p>Accessibility--the plant has been shut down since December 2016. The CCSD has yet to prove what it has maintained--that the plant is capable of producing 250 acre-feet within a 6-month dry period. In a question to staff at the DDW, I asked what percentage of potable water was returned from the tracer tests conducted in 2015 and 2016—the response: 50%. The first tracer test, conducted in early 2015, failed. The second tracer test, (which was supposed to run in the dry season of 2015), was stalled until September of 2016—just before the onset of the rainy season. It also failed, but was deemed successful through a “modeling” projection? So, is the CCSD capable of achieving their goal of producing 250 acre-feet of water within a 6-month dry-period time frame? We don't know!</p>	<p>Comment Noted</p>
<p><b>Dickason No. 2.4 - DOF Audit Recommendations</b></p>	<p>From an audit conducted by the Department of Finance, related to the DWR's Prop. 84 grant funding, of which \$4.3 million was allocated for Cambria's EWS project, two items raised concern in their report of May, 2018. Under the heading, “Recommendations” they stated the following: <b>A.</b> “Monitor Cambria's efforts in complying with the Regional Board's cease and desist Order and modification of the plant.” And, <b>B.</b> “After Plant modifications, require Cambria to test whether the new Plant can produce the requisite 240-250 acre-feet of water over a six-month dry period and report the results of its testing to the District and DWR.”</p>	<p>Comment Noted</p>

<p><b>Dickason No. 2.5 - Project Costs have More Than Doubled. District was Negligent</b></p>	<p>In terms of affordability, the costs associated with the EWS project, have more than doubled from the original estimate, and continue to escalate at a steady and alarming rate. Ratepayers' are the constant source to pay for the added costs. At the Regional Board meeting, July, 2017, a board member questioned whether a town the size of Cambria could sustain the costs of maintaining such a project; he was right! The ill-conceived, rush-to-judgment project, is not something any regulatory agency should be proud of permitting. Board chair, Dr. Wolff, (at the meeting mentioned above) said if he had known in November of 2014, what he knew in July, 2017, the District wouldn't have received either of its two permits for the EWS project! (CCSD is suing the project's engineering firm, CDM-Smith, for design flaws--the firm they revered for its design and construction, costing Cambria ratepayers even more dollars! Possibly there are design flaws, but in my opinion, this also speaks to the negligence and incompetence on the part of the District).</p>	<p>Comment noted</p>
<p><b>Dickason No. 2.6 - Emptying Surface Impoundment Is Behind Schedule</b></p>	<p>At the Regional Board meeting in Watsonville, July, 2017, the CCSD was ordered to decommission the impoundment basin. The expectation for removal of the pond's contents was August 31, 2018. That did not occur. The approximate volume in the Impoundment Basin at the end of the "dry season" 2018, was 537,000 gallons. Presently, there are approximately 1.5 million gallons. From my inquiry to staff at the Regional Board, I learned that the CCSD has only recently begun pumping 7 days a week—a year and a half since the pond was ordered to be decommissioned!</p>	<p>Implementation of the Cease and Desist Order, other than excluding the surface impoundment as an option for receiving any additional EWS waste, is not the subject of this proposed Order.</p>



<p><b>Dickason No. 2.7 - 5-feet of Seperation From the Liner Requirement Has Been Violated Again During This Rainy Season</b></p>	<p>From information I have obtained through requests to Regional Board staff, related to freeboard levels in the impoundment basin, I learned that there is currently an out-of-compliance issue with the 5-foot separation between the base of the basin and the groundwater beneath. While I understand that the CCSD and Regional Board staffs are aware of this, there is reason for concern of possible contamination as we continue to receive more precipitation. How will this be resolved?</p>	<p>Staff acknowledges that the 5-foot separation requirements has been violated again this year, however the threat to water quality presented by liquids in the impoundment is now significantly reduced due to dilution from above average rainfall this rainy season.</p> <p>The status of the surface impoundment, other than excluding it as an option for receiving additional EWS waste, is not the subject of the proposed Order.</p>
<p><b>Dickason No. 2.8 - Project Has Not Yet Received Regular CDP.</b></p>	<p>The project, after completion in October 2014, has not received approval for a regular CDP from the Planning Commission.</p>	<p>Comment Noted</p>
<p><b>Dickason No. 2.9 - SWRCB Working on Updated Water Licenses</b></p>	<p>The SWRCB is in the process of preparing the District's updated water licenses, which expired in the Santa Rosa aquifer in 2010 and the San Simeon aquifer in 2005.</p>	<p>Comment Noted</p>
<p><b>Dickason No. 2.10 - Trucking Brine Has Not Gone Through EIR Process</b></p>	<p>The trucking of brine waste to the SLO South Sanitation District, has not gone through an EIR process;</p>	<p>Section 8.5 of the SEIR considers the effects of trucking RO concentrate offsite for disposal at the rate of 10 truck trips per day (beginning on page 8-27) and concludes: "Offsite RO concentrate disposal would not significantly impact intersections, streets, highways, freeways, mass transit, or Congestion Management Program (CMP) facilities. Additionally, the Project modifications would not impact pedestrian or bicycle paths, since none are located on or immediately adjacent to the Project site."</p>
<p><b>Dickason No. 2.11 - De-Chlorination System Has Costs</b></p>	<p>there is the additional cost of a de-chlorination system</p>	<p>Comment Noted</p>

<p><b>Dickason No. 2.12 - In-stream Flow Studies have Not Yet Been Conducted</b></p>	<p>In-stream flow studies that as yet, have not been conducted.</p>	<p>Comment Noted</p>
<p><b>Dickason No. 2.13 - Coastal Commission Determined that the Site is in ESHA. Presence of Water Fowl and Proximity of Chemicals to Creek</b></p>	<p>From a recent Coastal Commission, staff ecology report, it was determined that the site of the facility is in Environmentally Sensitive Habitat Area (ESHA). Concerns remain with the presence of water fowl and many varieties of birds that are seen frequently in the impoundment basin. The notion that a project of this scope, using harmful chemicals in such close proximity to San Simeon Creek, and home to endangered species is troubling, and in my opinion, should never have been allowed and permitted.</p>	<p>Comment Noted</p>
<p><b>Dickason No. 2.14 - Commenter Presented Better Alternative Water Supply In 2013</b></p>	<p>A reservoir, off-stream storage project, that rancher Clyde Warren, and I worked on in the fall of 2013, would have been a far better project for Cambria's water issues. The site, (a dry-wall canyon, not a blue line stream) is across from the District's San Simeon well field. Engineering studies revealed a capacity of 600-700 acre feet, and seepage and evaporation of 5%. We presented this alternative to the community, Jan. 2014, and received an overwhelming vote of support for such a project. That site is still available!</p>	<p>Comment Noted</p>