

Tina S. Dickason  
574 Leighton St.  
Cambria, CA 93428

March 10, 2019

Jon Rokke  
Water Resource Control Engineer  
Central Coast Water Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

RE: "Comment Letter-Cambria WDR Update"

Dear Mr. Rokke,

Thank you for the opportunity to comment on the Cambria WDR Update. I am addressing issues that I wish to bring to the Regional Board's attention, and feel are worthy of their consideration.

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."

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).

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!

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: **A.** *"Monitor Cambria's efforts in complying with the Regional Board's cease and desist Order and modification of the plant."* And, **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."*

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).

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!

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?

Other issues still remain: The project, after completion in October 2014, has not received approval for a regular CDP from the Planning Commission. 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. The trucking of brine waste to the SLO South Sanitation District, has not gone through an EIR process; there is the additional cost of a de-chlorination system, as well as In-stream flow studies that as yet, have not been conducted.

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. I remain skeptical as to the final outcome of this project and its many challenges.

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!

I wish to thank members of the Regional Board staff, who have worked tirelessly on this project.

Sincerely,

A handwritten signature in cursive script, reading "Tina S. Dickason".

Tina S. Dickason