

8 March 2019

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To the Board and Mr. Rokke:

Thank you for your attention to Cambria's Emergency Water Supply Project. I appreciate your work to bring this project into compliance.

I would like to address several sections.

The Tracer Studies:

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.

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.

Under Violations History:

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.

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.

Regarding CEQA:

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.

The RWQCB's New Requirements:

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.

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.

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.

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."

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.

Maintenance on other water and wastewater infrastructure has been deferred beyond reason. The community suffers frequent water line breaks. The Stewart Street water tank is deteriorating and needs to be replaced. The Wastewater Treatment Plant needs updating.

The debt burden is such that Cambria is unable to qualify for other loans. It's a difficult situation for every aspect of service district management.

People packed the February CSD meeting to tell about the difficulty of finding affordable housing in Cambria. While the housing situation is complicated, rising water costs affect affordability. The burden falls most heavily on the service workers, an issue of environmental justice.

Father Mark Stetz, pastor of Santa Rosa Catholic Church, said that the majority of the Spanish-speaking members of the congregation need financial help. Many families with children are homeless, and a substantial percentage of students in Cambria's schools qualify for low-income meals.

Cambria's Chamber of Commerce and restaurant and hotel owners appealed for help on affordable housing. One CSD board member made the point that while retired residents may be rich in home equity, they may be living on a fixed income that is stretched to cover regular expenses such as water bills.

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.

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