

## Rokke, Jon@Waterboards

---

**From:** Luster, Tom@Coastal <Tom.Luster@coastal.ca.gov>  
**Sent:** Friday, March 8, 2019 9:36 AM  
**To:** Rokke, Jon@Waterboards  
**Cc:** 'bgresens@cambriacsd.org'  
**Subject:** Comments -- Cambria WDR Update -- Draft Order No. R3-2014-0050

To: Jon Rokke  
Central Coast Regional Water Quality Control Board

Re: Proposed Update of Order No. R-3-2014-0050

Hi Jon,

Thank you for the opportunity to comment on the above-referenced draft Order for the Cambria Community Services District ("CCSD").

We have just two brief comments for the Board's consideration:

- **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.
- **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.

Thanks again for this comment opportunity. Please let me know if you have questions,

Tom Luster

---

**Tom Luster**

Senior Environmental Scientist  
California Coastal Commission

45 Fremont Street #2000  
San Francisco, CA 94105  
415-904-5248

<http://www.coastal.ca.gov/>



Every Californian should conserve water. Find out how at:



[SaveOurWater.com](http://SaveOurWater.com) · [Drought.CA.gov](http://Drought.CA.gov)