

## Rokke, Jon@Waterboards

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**From:** leslie richards <heitera@hotmail.com>  
**Sent:** Friday, May 18, 2018 3:41 PM  
**To:** Rokke, Jon@Waterboards  
**Subject:** Regional Water Quality Control Board, San Luis Obispo

Regional Water Quality Control Board, San Luis Obispo

John M. Robertson  
Executive director

May 18, 2018

Dear Sir,

My name is Leslie Richards, 30 year resident of Cambria. I owned and operated an equestrian boarding and training facility for 17 years, adjacent to the Cambria CSD EWS project, until Jan. 15, 2015, when operations of the brine disposal impoundment blowers caused catastrophic injuries to my charges, and I was forced to close my business. Since that day, I have become a "reluctant activist" concerning the EWS project. I have spent years now monitoring the current project, educating myself on all aspects of operations, including researching the reporting criteria, operational manuals, hydro. modeling etc. and have assisted your excellent staff at the San Luis Obispo Regional office in documentation of potential negative environmental impacts by operations of this problematic project.

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. Senior staff responsible for this project will not be available to you or the board for questions and or clarifications concerning the changes of the the original EWS order issued November 2014. CCSD staff, as recent as yesterday, at a finance committee meeting, stated that there was some sort of rush by the district to push for this revised order because they, CCSD, intend to operate the AWTP in September 2018, so that additional data can be compiled concerning effective operational protocols, and thus allow the district to modify there reporting regime, saving the district money. This makes no sense to me with the information I have obtained concerning Regionals operational requirements. Currently, according to RWQCB order R3-2014-0050, the CCSD could operate the AWTP today if they so wished. Nothing is holding back this process, since the current permit from Nov. 2014 is still in effect. We the citizens of Cambria, are attempting to work towards effective solutions for this very problematic project. We have an election in Nov. for three new directors of the CCSD and I believe there will be a different approach concerning the ultimate outcome of the EWS. What is the rush here? Cambria's well fields are at an all time high, due to the march rains. We are not in a stage 3 water emergency. However, by using Regionals monitoring criteria as the excuse, CCSD staff may be asking county of San Luis Obispo County Planing Department to grant an operational exception to their ECDP, to run the plant during non-stage 3 water emergencies i.e. at stage 2, which is currently our position. In my opinion, this could set a dangerous precedent. Please delay your review of the updated order until after our new directors have been seated. This may save your staff and board time and energy from the possible event that, once again, the order would be brought back for a second opening and review by this new CCSD board.

In conclusion, I will not waste you're valuable time on a legal analysis concerning the quality of the updated draft order. I plan to send those comments directly to your staff for review. However, prior to my retirement to Cambria, 30+ years ago, I worked for the Law Firm of Richards, Watson, Dreyfuss and Gershon. I am not an environmental atty. but have extensive research experience and my cursory review of you're draft order pin points some legal holes, which could be challenged in court, in the future. The staff report is a better written document then the draft order, so why not allow your SLO staff the time they need to address the response letters, and affect possible corrections or changes to your draft order? Please remove from the June 2018 Regional Board meeting agenda, CCSD's EWS ,Order NO R 3 2014-0050, for consideration at a later date.

Thank you,

Leslie Melina Richards  
1501 San Simeon Creek Road  
Cambria , California. 93428

Sent from my iPad