

## Rokke, Jon@Waterboards

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**From:** swartcr@earthlink.net  
**Sent:** Friday, March 8, 2019 11:53 AM  
**To:** Rokke, Jon@Waterboards  
**Subject:** Comment Letter - Cambria WDR Update

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Jon,

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.

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.

Thank you for your consideration of these comments.

Regards,  
Crosby Swartz  
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