

Rokke, Jon@Waterboards

From: Tom Gray <tsgrey@sbcglobal.net>
Sent: Thursday, March 7, 2019 4:42 PM
To: Rokke, Jon@Waterboards
Subject: Comment Letter - Cambria WDR Update
Attachments: Cambria WDR Update -- Order No. R3-2014-0050.docx

Dear Mr. Rokke,

I am writing to you in support of the proposed updates of Order No. R3-2014-0050, Waste Discharge Requirements and Waste Recycling Requirements for the Cambria CSD Emergency Water Treatment Facility and Recycled Water Re-Injection Project.

As a full-time resident of Cambria for nearly 10 years, I am acutely aware of what chronic water shortages can do to a community's quality of life. I know how important it is that Cambria, since 2014, has had a reliable supplemental water source to ensure that it does not run dry in severe droughts.

I also know how hard the staff of the Central Coast Water Board has worked to make sure that our Emergency Water Supply (EWS) operates effectively and in accord with all of the water quality standards in the Water Board's jurisdiction. The relationship between the Cambria Community Services District and the Water Board has had its frictions, but at this point I am glad to see the two entities truly working as partners.

In my view, the proposed updates of order No. R3-2104-0050 reflect this collaborative spirit. They codify changes that were made to EWS operations as problems arose and solutions were worked out at the staff level between CCSD and the Water Board.

The most crucial of these changes is in the method of R/O concentrate disposal. With the evaporation pond no longer used for this purpose, it is essential that an alternative method – off-site trucking in this case -- be approved by the Water Board so that the EWS can operate in the next (inevitable) drought. Another important change is a reduction in the frequency of groundwater monitoring when the EWS is not running. These and other updates are fair, reasonable and beneficial to Cambria.

You will most likely be hearing from opponents of the water project urging the Water Board to delay, if not reject, the proposed updates. If the past is any guide, they may present arguments that pertain only to the project's environmental review under CEQA and the Coastal Development Permit process, not to the specific issues of water quality and safety that are under your purview.

They may also suggest that the CCSD is not competent or adequately staffed to operate the EWS safely. As your staff report points out, the CCSD has had a sterling record of on-time reporting since early 2017; it also now has a full-time employee whose sole responsibility is operation and maintenance of the EWS.

Moreover, actions taken by the CCSD since 2015 have significantly improved the quality of groundwater and surface water in and near lower San Simeon Creek. It is fair to note, as you do, that the CCSD's solid record of the past two years pertains to a period in which the facility was not operating. However, it is also fair, given that same record, to allow the facility's operation to go forward by approving the proposed WDR updates.

I have been closely involved with the EWS project, from its inception (as a consultant to the CCSD) to the current efforts to obtain a regular Coastal Development Permit for the project under the label of “Sustainable Water Facility.” I am currently on the steering committee of Cambrians for Water, a group with more than 800 members that is committed to getting a regular CDP for the SWF on terms that allow its operation to the maximum benefit of the community. I believe that this group represents the opinion of most Cambrians, who want true water security. Approval of the updates would bring us all closer to that goal.

Sincerely,

Tom Gray
Cambria, CA
805-927-5176
tsgray@sbcglobal.net

P.S.: Please see attachment for a version of this letter in Word.