STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING OFJUNE 20-21, 2024
Prepared on May 29, 2024

ITEM NUMBER:	**7**
SUBJECT:	**Consideration of Proposed Order R3-2024-0001, Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit CA0049224 for the City of San Luis Obispo Water Resource Recovery Facility**
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KEY INFORMATION

Location:	35 Prado Road, San Luis Obispo, San Luis Obispo County
Type of Discharge:	Disinfected tertiary treated wastewater
Permitted Monthly Average Effluent Flow:	5.4 million gallons per day (MGD)
Treatment:	Wastewater treatment includes mechanical screening, grit removal, primary settling, Modified Ludzack-Ettinger bioreactors, ultrafiltration, and ultraviolet (UV) disinfection. Sludge is thickened with rotary screw thickeners before anaerobic digestion and liquid removal with a screw press and belt filter press.
Disposal:	Inland surface water discharge to San Luis Obispo Creek. Digested biosolids are hauled away for composting.
Reclamation:	Production of recycled water for irrigation of onsite landscaping and other landscape irrigation uses in the City of San Luis Obispo.
Existing Orders:	NPDES Order R3-2014-0033 and Master Reclamation Requirements Order R3-2003-081
ACTION:	**Consideration of Proposed Order R3-2024-0001**

SUMMARY

This staff report provides a brief overview of the proposed reissuance of the existing NPDES permit for the City of San Luis Obispo Water Resource Recovery Facility (Facility). The Facility is a publicly owned treatment works (POTW) operated by the City of San Luis Obispo (Discharger). Proposed Order R3-2024-0001 includes effluent limitation and monitoring changes from prior orders issued to the Discharger based on the results of a reasonable potential analysis (RPA).[1] The Discharger was the only entity to submit comments during the public comment period. The Discharger's comments and Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff responses are detailed in Attachment 1. A discussion of the permit revisions based on the RPA and in response to the Discharger's comments is provided in this staff report. The proposed order includes requirements that ensure the discharge of treated wastewater is protective of water quality and beneficial uses and that recycled water is treated to a standard that is protective of public health and the environment. Central Coast Water Board staff recommends adoption of the proposed order (Attachment 2).

DISCUSSION

The Discharger owns and operates the Facility and treats wastewater from the City of San Luis Obispo; California Polytechnic State University, San Luis Obispo; and the San Luis Obispo County Regional Airport. The Facility receives domestic, commercial, and industrial wastewater. The Discharger currently discharges tertiary-treated wastewater from the Facility pursuant to Order R3-2014-0033, NPDES Permit CA0049224. The Discharger submitted a report of waste discharge (i.e., permit renewal application), dated May 28, 2019, to continue discharging a permitted monthly average dry weather effluent flow up to 5.4 million gallons per day from the Facility.

The Facility discharges tertiary treated disinfected effluent to San Luis Obispo Creek. Currently, enrollment in Master Reclamation Requirements Order R3-2003-081 allows the Discharger to produce recycled water for use on the Facility site and for direct non-potable uses at various locations within and around the City of San Luis Obispo, such as for irrigation and construction dust control. The proposed order has been updated to authorize the Discharger to act as the producer of recycled water. The use and distribution of the recycled water for offsite uses will be authorized by other permits.

During the late spring to early winter, the natural creek flows are low, and the effluent discharge makes up the majority of the creek flow below the effluent discharge point.

[1]A reasonable potential analysis is used to determine whether a discharge, alone or in combination with other sources of pollutants to a waterbody and under a set of conditions arrived at by making a series of reasonable assumptions, could lead to an excursion above an applicable water quality standard. Federal regulations also specify that the reasonable potential determination must apply not only to numeric criteria, but also to narrative criteria.

Summary of Time Schedule Orders

During the permit term for Order R3-2014-0036, the discharger could not immediately achieve compliance with the permit's chlorodibromomethane, dichlorobromomethane, and nitrate effluent limitations. The Central Coast Water Board issued two time schedule orders (TSOs) to set interim effluent limitations and compliance timelines: TSO R3-2014-0036 and TSO R3-2019-0124. TSO R3-2014-0036 set interim limits for the three aforementioned pollutants with full compliance with the permit's final effluent limitations by November 30, 2019. With the planned upgrades to the Facility's biological and disinfection units, TSO R3-2019-0124 extended the deadlines to meet the interim effluent limitations with a compliance deadline of March 31, 2020 for chlorodibromomethane and dichlorobromomethane and a compliance deadline of July 31, 2023 for nitrate. The interim effluent limitations were established considering the Facility's performance. When operating under a TSO, if an effluent concentration exceeds the final effluent limitation but does not exceed the interim effluent limitation, an effluent violation has not occurred, and mandatory minimum penalties do not apply. If an effluent concentration exceeds both the final and interim effluent limitation values, then an effluent violation has occurred, and mandatory minimum penalties do apply.

To address compliance issues with nitrate, chlorodibromomethane, and dichlorobromomethane, the Discharger has been implementing a significant upgrade of the Facility's biological, disinfection, and biosolids units since 2019. The Facility now uses Modified Ludzack-Ettinger bioreactors for nutrient removal. Filtration and disinfection are now achieved with hollowfiber membranes and UV disinfection. Final completion of all phases of the upgrade is on track for November 2024.

Compliance History

The following discussion is a summary of the violations that occurred during the term and administrative extension of Order R3-2014-0033. During the time period from December 1, 2014, to May 31, 2023, the Discharger incurred effluent violations related to nitrate, oil and grease, total coliform, chlorine residual, dichlorobromomethane, and chlorodibromomethane. The number of violations, violation type, and reported value range are provided in Table 2. Of the exceedances shown below, 17 were determined to be subject to mandatory minimum penalties and were resolved through Expedited Payment Letters R3-2021-0061 and R3-2023-0005.

Table 1. Compliance Summary from December 1, 2014 through May 31, 2023

Pollutant	Monitoring Period	Violation Type	Number of Violations	Reported Value Range	Permit Limitation	Units[2]
Nitrate (Total as N)	December 2016-November 2022	Monthly Average (Mean) Limit	9	43.2-51.7	10	mg/L
Oil and Grease	March 2017	Monthly Average Limit	1	6	5	mg/L
Total Coliform	July 2018-October 2020	30-Day Specific Limit	3	33-1600	23	MPN/100mL
Total Coliform	December 2019-October 2020	Daily Maximum	3	540-1600	240	MPN/100mL
Residual Chlorine	February 2020-December 2022	Daily Maximum	2	0.35-0.75	ND	mg/L
Dichlorobromomethane	April 2020-October 2022	Monthly Average Limit	4	2.5-17.8	0.56	µg/L
Dichlorobromomethane	April 2020-October 2022	Daily Maximum	4	2.5-17.8	1	µg/L
Chlorodibromomethane (Dibromochloromethane)	April 2020-October 2022	Monthly Average Limit	3	1.2-5	0.40	µg/L
Chlorodibromomethane (Dibromochloromethane)	April 2020-October 2022	Daily Maximum	3	1.2-5	1	µg/L

The Discharger conducted eight acute and 26 chronic toxicity tests using the species *Pimephales promelas* (fathead minnow) between October 2015 and October 2022. The Discharger failed zero acute toxicity tests and 14 chronic toxicity tests, representing a

[2] mg/L is milligrams per liter; MPN/100mL is most probable number per 100 milliliters; µg/L is micrograms per liter.

chronic toxicity test fail rate of 54 percent. The failed chronic toxicity tests occurred between 2017 and 2018. After an extensive review of the treatment system and discharge pipeline, the Discharger submitted a Toxicity Reduction Evaluation (TRE) Workplan Conclusion report on May 22, 2019. The conclusion of the TRE Workplan was that all effluent sampling events from October 2017 to October 2018 exhibited at least one of the three qualifying data interpretations of sporadic mortality, suggesting biological interference was the cause of observed toxicity. To mitigate the potential biological interference, the Discharger chlorinated the effluent line twice in late 2018 and early 2019. The effluent has not failed any chronic or acute toxicity tests since October 2018.

Changes from the Existing Order

Central Coast Water Board staff structured the proposed order in accordance with the statewide NPDES permit template. Central Coast Water Board staff also reviewed the previous order and incorporated requirements from the previous order that need to be carried forward. The following summarizes the significant proposed changes from the previous order, which are also discussed in detail in the proposed order fact sheet:

Accessibility updates. The State Water Board template for NPDES permits has been updated and revised to accommodate document accessibility needs associated with text styles formatting to facilitate the use of document reader software for persons with visual impairments or learning disabilities. Most notably, there are numerous changes to table formatting and outline structure from the previous order.

Updated Owner, Contact Information, and Facility Name. The Facility has new contact information since the adoption of the previous order. The proposed order updates the current contact information (Attachment F – Fact Sheet, Table F-1).

Updated Facility Description. The Discharger has been implementing a significant upgrade of the Facility's biological, disinfection, and biosolids units since 2019. A focus of the facility upgrade was to improve removal of chorine disinfection byproducts and nitrate to meet the effluent limitations of the previous permit. The proposed order updates the description of wastewater and biosolids treatment and controls in Attachment F - Fact Sheet.

Updated references. Many guidance documents, policies, and orders referenced in the previous order have been updated, amended, or superseded since 2014. The proposed order includes updated citations and provides website links where direct access to the current versions of the references are available.

Recycled Water Production. The proposed order implements the Recycled Water Policy by supporting the production of recycled water and requiring volumetric reporting of wastewater and recycled water to the State Water Board.

Effluent Limitations Changes. The effluent limitation for n-nitrosodimethylamine has not been retained from the previous order. The elimination of this water quality-based effluent limitation (WQBEL) is consistent with the exception to the Clean Water Act's anti-backsliding requirements expressed at section 402 (o)(2)(B)(i), which allows a reissued permit to include less-stringent limitations when information is available that was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and that would have justified the application of a less-stringent effluent limitation at the time of permit issuance. In these circumstances, less-stringent limitations (here, the removal of limitations) are based on new data, which was generated during the term of previous order, and which demonstrates no reasonable potential for discharges from the Facility to cause or contribute to exceedances of applicable water quality objectives for this pollutant. Therefore, the effluent limitation for this pollutant is not retained in the proposed order.

Reasonable potential to cause or contribute to exceedances of standards has been determined for mercury, chlorodibromomethane, chloroform, dichlorobromomethane, methylene chloride, pentachlorophenol, nitrate, nitrite, methylene blue activated substances (MBAS), un-ionized ammonia, molybdenum, total dissolved solids (TDS), chloride, sulfate, and sodium, requiring effluent limitations for these parameters.

Effluent Monitoring Decreases. Effluent monitoring requirements have been retained from Order R3-2014-0033 for Discharge Point 001 to San Luis Obispo Creek, with one exception. Quarterly effluent monitoring for n-nitrosodimethylamine has been removed since there was no reasonable potential to exceed water quality objectives in the receiving water. Annual monitoring for all 126 priority pollutants listed in the California Toxics Rule, including n-nitrosodimethylamine, is included in the proposed order.

Effluent Monitoring Additions. Effluent monitoring requirements have been retained from the previous order for Discharge Point 001, with some exceptions. Effluent monitoring frequency has been increased in the proposed order to monthly for those pollutants with a reasonable potential to cause or contribute to an exceedance of a water quality standard and for which effluent limitations were established: mercury, chlorodibromomethane, chloroform, dichlorobromomethane, methylene chloride, pentachlorophenol, nitrite (as N), un-ionized ammonia, MBAS, TDS, sulfate, chloride, and sodium. Chronic toxicity monitoring has increased to monthly to reflect the requirements of the updated Toxicity Provisions. A quarterly effluent monitoring requirement has been established for hardness to assist with the next permit's reasonable potential analysis. For all other pollutants, including California Toxics Rule priority pollutants, pollutants with established maximum contaminant levels (MCLs), and pollutants with numeric water quality objectives in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan), an annual effluent monitoring frequency has been established.

Receiving Water Monitoring Additions. Receiving water monitoring requirements have been retained from the previous order, with some exceptions. Receiving water monitoring for fecal coliform was replaced with *E. coli* monitoring to be consistent with the updated State Water Board Bacteria Provisions. Annual monitoring has been established for CTR pollutants, Title 22 pollutants, and those pollutants shown to have a reasonable potential to cause or contribute to an exceedance of a water quality standard. This additional receiving water monitoring will assist with the next permit's reasonable potential analysis.

303(d) Listings. The U.S. EPA approved the state's 2020-2022 303(d) list of impaired water bodies on May 11, 2022. The 2020-2022 303(d) list identifies San Luis Obispo Creek, below Osos Street, as impaired for chloride, sodium, benthic community effects, *Escherichia coli* (*E. coli*), dissolved oxygen, nitrate, and toxicity. The proposed order includes requirements for the Discharger to not cause or contribute to these impairments, by establishing effluent limitations for chloride, sodium, total coliform, dissolved oxygen, nitrate, and chronic toxicity.

Maps and Process Flow Diagrams. Attachments B and C have been updated with higher quality maps and process flow diagrams.

Mercury Water Quality Objective. Since the adoption of the previous order, the State Water Board adopted and approved *Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions* (ISWEBE Plan Part 2). The ISWEBE Plan Part 2 includes one new narrative and four new numeric mercury water quality objectives applicable to inland surface waters, enclosed bays, and estuaries of the state that have any of the following beneficial use designations: commercial and sport fishing (COMM), tribal tradition and culture (CUL), tribal subsistence fishing (T-SUB), wildlife habitat (WILD), marine habitat (MAR), rare, threatened, or endangered species (RARE), warm fresh water habitat (WARM), cold fresh water habitat (COLD), estuarine habitat (EST), or inland saline water habitat (SAL). The proposed order implements the new mercury objectives and revised mercury-specific procedures developed in accordance with ISWEBE Plan Part 2, including establishing a new effluent limitation for mercury.

Bacteria Provisions. On August 7, 2018, the State Water Board adopted Part 3 of the *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Bacteria Provisions and a Water Quality Standards Variance Policy* (Bacteria Provisions), which establishes bacteria water quality objectives for reasonable protection of people that recreate within all surface waters, enclosed bays, and estuaries of the state that have the water contact recreation beneficial use (REC-1). The proposed order establishes *E. coli* receiving water limitations, based on the water quality objectives in the Bacteria Provisions, in place of the previous fecal coliform receiving water limitations.

Toxicity Provisions. On October 5, 2021, the State Water Board adopted a resolution to confirm that the Toxicity Provisions were adopted as state policy for water quality control for all inland surface waters, enclosed bays, estuaries, and coastal lagoons of the state. The provisions were approved by the California Office of Administrative Law on April 25, 2022, and were approved by the U.S. EPA on May 1, 2023. The provisions include statewide numeric water quality objectives for both acute and chronic toxicity and a program of implementation to control toxicity. The provisions provide consistent protection of aquatic life beneficial uses in inland surface waters, enclosed bays, estuaries, and coastal lagoons throughout the state from the effects of known and unknown toxicants. The proposed order implements the toxicity provisions and effluent limitations for chronic toxicity.

Order Findings. The proposed order (Findings, section 2) has been updated to include findings for Water Reclamation Requirements for Recycled Water Production and Use, Response to Climate Change, Human Right to Water, and Disadvantaged Community Status.

Climate Change Adaptation Implementation Progress Report. The Discharger has been proactive in its approach to climate change planning and initiatives. The proposed order (Other Special Provisions) has been updated to require that the Discharger submit a Climate Change Adaptation Implementation Progress Report to the Central Coast Water Board Executive Officer describing the Discharger's progress in implementing, monitoring, and updating its long-term approach for identifying and addressing climate change hazards and vulnerabilities at the Facility, including all associated infrastructure (e.g., treatment facilities, conveyances to discharge points, discharge facilities). The proposed order requires the progress report to be submitted every five years to align with the updates of the other planning documents.

Public Comment Period and Draft Time Schedule Order

The draft order was released for public comment on December 14, 2023, and comments were due by January 16, 2024. Additionally, Central Coast Water Board staff mailed individual letters to 17 tribal contacts notifying them of the draft order and of the opportunity to participate in the development of the order.

One set of comments was received on the draft order, from the Discharger, via email on January 11, 2024. Central Coast Water Board staff revised the proposed order in response to the Discharger's comments. A summarized version of the comments and detailed responses to comments are provided in Attachment 1. The Discharger stated that it may not be able to comply immediately with new limits in the draft order for TDS, chloride, sodium, sulfate, and molybdenum and requested an in-permit compliance schedule to protect it from third-party lawsuits and mandatory minimum penalties. As discussed in the response to comments document (Attachment 1), Central Coast Water Board staff determined that the Discharger is not eligible for an in-permit compliance schedule, but the Discharger is eligible for a TSO.

To provide the Discharger time to implement changes to its pretreatment program to ultimately comply with the proposed order's new effluent limitations for TDS, chloride, sodium, sulfate, and molybdenum, Central Coast Water Board staff developed draft TSO R3-2024-0021 (Attachment 3). The draft TSO includes interim effluent limitations based on Facility performance from January 2015 through December 2023 and a compliance schedule for achieving the final effluent limitations in the proposed order. The Central Coast Water Board publicly noticed the draft TSO from March 12, 2024, to April 11, 2024. No comments were received during the public comment period. The TSO will be signed by the Executive Officer and will go into effect on the effective date of the permit. The TSO will require the Discharger to implement a plan to improve discharge water quality and meet final effluent limitations for TDS, chloride, sodium, sulfate, and molybdenum within five years.

Staff also made various minor, non-substantive changes to the draft order for clarity and accuracy.

Recycled Water Production and Use

The proposed order allows the production and use of disinfected secondary and tertiary recycled wastewater in compliance with applicable state and local requirements regarding the production and use of reclaimed wastewater, including those requirements established by the State Water Board's Division of Drinking Water (DDW) in title 22, sections 60301-60357 of the California Code of Regulations, Water Recycling Criteria. Additionally, the proposed order includes water reclamation requirements for the Facility pursuant to DDW's recommendations submitted to the Central Coast Water Board. The distribution and offsite reuse of recycled water produced by the Facility is subject to the State Water Board's *General Water Reclamation Requirements for Recycled Water Use* (State Water Board Order WQ 2016-0068-DDW), or other applicable permit, dependent on final use.

Response to Climate Change

Climate change refers to observed changes in regional weather patterns such as temperature, precipitation, and storm frequency and size. At the local scale, within urbanized areas, climate change may directly impact groundwater and surface water supply; drainage, flooding, and erosion patterns; and ecosystems and habitat. This shift in climate, combined with California's growing population, has increased reliance on pumping, conveying, treating, and heating water, increasing the water sector's greenhouse gas emissions. The State Water Board's Resolution 2017-0012, *Comprehensive Response to Climate Change*, requires a proactive response to climate change in all California Water Board actions, with the intent to embed climate change consideration into all programs and activities.

Aligning with Resolution 2017-0012, the proposed order supports the beneficial reuse of the Facility's treated effluent to offset potable water supplies for irrigation and dedicated in-stream flows to support critical creek habitat. The proposed order incorporates requirements for the Facility to beneficially reuse treated effluent, which serves to diversify the State's water supply portfolio to prepare for uncertainties in water

resources due to the changing climate through ongoing implementation, monitoring, and updating of the Discharger's climate action planning efforts using the best available data and technology for wastewater treatment and operation.

In 2019, the Discharger participated in the development of the *Multi-Jurisdictional San Luis Obispo Hazard Mitigation*, a planning effort that identifies and prioritizes the Discharger's vulnerability to hazards and outlines mitigation goals and objectives. In August 2020, the Discharger adopted its Climate Action Plan with goals for community-wide carbon neutrality by 2035. Most recently, on January 17, 2023, the Discharger adopted the *Climate Adaptation and Safety Element* as part of its general plan. According to Disaster Mitigation Act (DMA) requirement §201.6(d)(3), the Discharger must review and revise this plan within five years for continued mitigation project grant funding. Additionally, the Discharger is currently undergoing construction of the SLO Water Plus project, which includes Facility upgrades to improve the Facility's energy efficiency, provide flood protection improvements, increase treatment capacity, and improve resource recovery. To incorporate proactive planning for the future, the proposed order requires the Discharger to report on implementation progress, monitoring, and planning updates at this Facility as they relate to flooding, wildfire, renewable energy generation and energy efficiency, temperature, water recycling, biosolids reuse, and influent flow and loading fluctuations exacerbated by climate change.

Human Right to Water

California Water Code section 106.3, subdivision (a) states that it is the policy of the State of California "that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation purposes." On January 26, 2017, the Central Coast Water Board adopted Resolution R3-2017-0004, which affirms the realization of the human right to water and the protection of human health as the Central Coast Water Board's top priorities.

Consistent with the human right to water stated in California Water Code section 106.3, subdivision (a), and the Central Coast Water Board's Resolution R3-2017-0004, the proposed order promotes actions that advance the human right to water and discourages actions that delay or impede opportunities for communities to secure safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. The proposed order implements recently updated mercury water quality objectives that are more stringent than previous objectives to more adequately protect beneficial uses related to water and fish consumption.

Environmental Justice

Environmental Justice principles call for the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income in the development, adoption, implementation, and enforcement of all environmental laws, regulations, and policies that affect every community's natural resources and the places people live, work, play, and learn. The Central Coast Water Board implements regulatory activities and water quality projects in a manner that ensures the fair treatment of all people,

including Underrepresented Communities. Underrepresented Communities include but are not limited to Disadvantaged Communities (DACs), Severely Disadvantaged Communities (SDACs), Economically Distressed Areas (EDAs), Tribes, Environmentally Disadvantaged Communities (EnvDACs), and members of Fringe Communities.[3] Furthermore, the Central Coast Water Board is committed to providing all stakeholders the opportunity to participate in the public process and provide meaningful input to decisions that affect their communities.

The proposed order regulates the production of recycled water and discharge of treated domestic wastewater to inland surface waters. Using 2020 census data, 16 block groups were identified as DACs in the City of San Luis Obispo, representing over half of the city population. Operation of this publicly owned treatment works in compliance with the proposed order will not pose a significant threat to water quality and is therefore unlikely to impact DACs. If impacts to surface water result from the discharges regulated by the proposed order, Central Coast Water Board staff will help facilitate outreach and education to inform affected parties and connect them with available resources. The potential costs to the Discharger and associated communities related to the new requirements are supported by the water quality and beneficial use protection and restoration benefits, including the protection of public health. In addition, the TSO will provide temporary relief to the Discharger and associated communities from potential mandatory minimum penalties while the Discharger implements corrective actions in response to the new effluent limitations.

CONCLUSION

Proposed Order R3-2024-0001 has been drafted and prepared in compliance with the Basin Plan and state and federal guidance and regulations. The proposed order is protective of water quality, requires a monitoring and reporting program sufficient to demonstrate compliance with the proposed order's effluent limitations and other requirements given the results of the reasonable potential analysis, and supports efforts to produce and reuse recycled water.

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[3] Disadvantaged Community: a community with an annual median household income that is less than 80% of the statewide annual median household income (Public Resources Code section 80002(e)); Severely Disadvantaged Community: a community with a median household income of less than 60% of the statewide average. (Public Resources Code section 80002(n)); Economically Distressed Area: a municipality with a population of 20,000 persons or less, a rural county, or a reasonably isolated and divisible segment of a larger municipality where the segment of the population is 20,000 persons or less with an annual median household income that is less than 85% of the statewide median household income and with one or more of the following conditions as determined by the department: (1) financial hardship, (2) unemployment rate at least 2% higher than the statewide average, or (3) low population density. (Water Code section 79702(k)); Tribes: federally recognized Indian Tribes and California State Indian Tribes listed on the Native American Heritage Commission's California Tribal Consultation List; EnvDACs: CalEPA designates the top 25 percent scoring census tracts as DACs. Census tracts that score the highest five percent of pollution burden scores but do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data are also designated as DACs (refer to the CalEnviroScreen 3.0 Mapping Tool or Results Excel Sheet); Fringe Community: communities that do not meet the established DAC, SDAC, and EDA definitions but can show that they score in the top 25 percent of either the Pollution Burden or Population Characteristics score using the CalEnviroScreen 3.0.

RECOMMENDATION

Adopt Proposed Order R3-2024-0001

ATTACHMENTS

1. Comments and Staff Responses
2. Proposed Order R3-2024-0001
3. Draft Time Schedule Order R3-2024-0021

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