



Tuesday, July 21, 2017

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California Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401  
Attn: Steve Saiz, Peter Von Langen

**RE: September 21-22, 2017 RWQCB Agenda: Draft Discharge Requirements (WDR) Order No. R3-2017-0032, NPDES Permit No. CA0047364 - Carpinteria Sanitary District Wastewater Treatment Plant, Santa Barbara County**

Dear Chair Jean-Pierre Wolff and Members of the Regional Board:

Heal the Ocean has had a chance to review the Draft Order R3-2017-0032 for the Carpinteria Sanitary District Waste Discharge Requirements (WDR), and have come across an issue we'd like to see if the Board would consider fixing.

We respectfully request that the NPDES permit include language allowing for, and facilitating, the Indirect Potable Reuse (IPR) project that CSD and the Carpinteria Valley Water District (CVWD) are moving forward with.

Specifically we ask the Board to insert language now, to cover the planned improvements/changes at the CSD treatment plant - a "reopener provision" that would allow modification of the permit when the time comes, for CSD to move forward with its WWTP facilities upgrade for IPR.

Heal the Ocean would like to ask that there is no undue delay (and expense) for CSD to run into, by having to apply for an entirely new permit as it moves forward with its IPR project.

We ask the Board that this section of the permit be reworded accordingly to include the IPR/Recycling project, so that CSD is not required to reopen the permit to put in language for the advanced treatment project.

The current Draft WDR is for five years. During this time, before the permit is up for renewal, CSD/CVWD will be well on their way to finishing design, completing permitting/CEQA, and very possibly even breaking ground for the

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*HTO Founding Board/Emeritus Directors: Jeff Young (HTO Co-Founder); Sally Bromfield; Jean-Michel Cousteau\*; Stan Harfenist; Hillary Hauser\*; Joseph Liebman; Francoise Park\*; Charles Vinick\*; Jonathan Wygant; Jana Young (\*still active)*

advanced treatment facility. The Title 22 section of the NPDES Permit should have provisions - now - that allow for and facilitate the upgrade to the treatment plant. .

Heal the Ocean has long been an advocate for WWTPs upgrading to recycled water plants. We have hired consultants to access State Water Board funds for planning grants, as well as convince a number of districts to move in the direction of Proposition 1 construction grants for recycled water facilities upgrade. We were successful in our outreach to the Goleta Water District/Goleta Sanitary District, as well as the Santa Ynez Community Services District.

In 2015 we were preparing to approach CSD/CVWD, to introduce the Districts to a RMC Water consultant who could get them started in this process. We were pleasantly surprised to find CSD/CVWD far ahead of us (!), in that they had already contacted the RMC consultant, and were well into the process of developing its *Carpinteria Valley Recycled Water Facilities Plan*, which was finalized in April 2016:

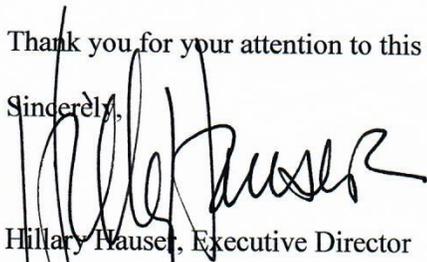
[http://healtheocean.org/images/ugc/uploads/misc/CARP\\_SAN\\_CARP\\_WATER\\_DISTRICT\\_FACILITIES\\_UPGRADE\\_PLAN\\_TO\\_RECYCLED\\_WATER.pdf](http://healtheocean.org/images/ugc/uploads/misc/CARP_SAN_CARP_WATER_DISTRICT_FACILITIES_UPGRADE_PLAN_TO_RECYCLED_WATER.pdf)

Having collaborated with Carpinteria Sanitary District on a number of projects - most notably the South Coast Beach Communities Septic to Sewer Project (Rincon), Heal the Ocean knows the District well. We know of the incentive and follow-through of its General Manager and Board of Directors. We are very pleased that the CSD/CVWD districts are leading the way in Santa Barbara County to recycled water upgrade, to IPR and to groundwater recharge!

Therefore, we ask the Regional Board to help remove time-consuming obstacles to this project, by inserting a provision into the current draft permit that allows the Districts to move forward without having to reapply for a new permit that requires them to start all over again.

Thank you for your attention to this matter.

Sincerely,



Hillary Hauser, Executive Director

cc: Craig Murray, General Manager Carpinteria Sanitary District  
Robert McDonald, General Manager Carpinteria Valley Water District