

Kessler, John

From: [REDACTED]
Sent: Friday, September 10, 2021 9:37 PM
To: Kessler, John
Subject: CASE NO. PL19-0039--Board of Supervisor Hearing, September 14, 2021, 3 p.m.
Attachments: Well #7 capital project white paper 180619.pdf; 24 Jan 2019 staff rpt on Well #4 Options .pdf

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

John,

I've been reading the letters posted today and noticed that the September 8 letter from Stephen and Bethany Carfaro says it is attaching two Crestview white papers, but they are not included in the public file. Perhaps they forgot to attach them. As it happens, I have copies of both documents and attach them here and ask that you include them in the record and in the documents provided to Supervisors.

Regards,

Roger Chittum

Stephen and Bethany Carfaro

September 8, 2021

Honorable Linda Parks, Chair
Honorable Kelly Long, Supervisor
Honorable Robert O. Huber, Supervisor
Honorable Carmen Ramirez, Supervisor
Honorable Matt LaVere, Supervisor
Board of Supervisors
County of Ventura
800 S. Victoria Avenue
Ventura, CA 93009-1740

RE: CASE NO. PL19-0039-Board of Supervisor Hearing, September 14, 2021, 3 p.m.

Dear Honorable Chair Parks and Supervisors:

I urge the Board of Supervisors should uphold the unanimous decision of the Planning Commission to deny a Conditional Use Permit to drill Well #7 at 191 Alviso. Crestview's message that the only alternative to Well #7 is buying water from Calleguas is part of a calculated effort to mislead and stampede shareholders and public officials with statements that are simply not true. There are at least three better and cheaper alternatives that can be implemented more quickly.

The best, cheapest, and fastest alternative to drilling Well #7 is to rehabilitate and restart Well #4. This can be done for about \$250,000 according to two reports to Crestview's board by its general manager. These June 15, 2018 and January 24, 2019 white papers are attached. This is less than one-tenth the cost of Well #7, which Crestview's general manager projected at the August 2021 board meeting would be 3.5 to 4 million dollars. If Well #4 had been rehabilitated last winter when it was off line, the money saved by not buying Calleguas water in the summer and fall of 2021 would have paid for that entire investment.

Even if Well #7 is installed, rehabilitation of Well #4 is necessary because Crestview's operations plan is to have Well #7, Well #4, and Well #6 operate in rotation. See the June 15, 2018 white paper. Well #4 can be rehabbed before the spring of 2022, and it can be done without permits or

any impact on neighbors. That Crestview has not already spent approximately \$30,000 to evaluate the well in detail, define specific improvements, and nail down the costs of doing the work is, at best, serious mismanagement.


\$30,000 is much less than Crestview has spent on public relations consultants and opinion polling. In the poll, shareholders were given a grossly misleading description of the Well #7 project. It did not disclose the unsolvable problems of the neighboring septic systems, the inability to comply with the noise ordinance, the reasons the Planning Commission denied the permit, or what the costs are realistically going to be. It did not disclose that the Crestview board considered on January 24, 2019 **nine options** to buying more expensive Calleguas water. Shareholders were then invited to say whether they favored or opposed Well #7. It was a push poll, the results are meaningless, and the consulting fees were wasted.

I urge Supervisors to uphold the unanimous decision of the Planning Commission to deny Crestview's application to drill a new well at 191 Alviso.

Sincerely,


Stephen Carfaro Jr




Bethany Carfaro



BOARD OF DIRECTORS WHITE PAPER

TO: CRESTVIEW MUTUAL BOARD OF DIRECTORS
FROM: ROBERT ERANIO, CONSULTING GENERAL MANAGER
TOPIC: WELL #7 CAPITAL PROJECT
DATE: JUNE 19, 2018

Recommendation: To receive the report, as this will assist the Board in its decision-making on how best to proceed with the proposed Well #7 project, fitting within the company's mission statement.

Fiscal Impacts: Future project costs are estimated at \$1.8 million dollars to complete. If approved at this meeting, costs impacts between approval and end of the fiscal year would equal approximately \$30,000. Total costs spent to date equal \$515,000.

Background / Analysis: Crestview Mutual Water was formed in March 1950. Since that time, Crestview has drilled 6 production wells or roughly one every 15-years. In 1982, Well #4, (located at 6 Alviso Drive) was drilled to a depth of 1,400ft and it quickly became the primary source of water for the district. In the summer of 1993, Crestview drilled Well #5 located at 602 Valley Vista Drive, Camarillo to a depth of 1,800ft. In May 1995, Well #5 was started to production and by the fall of 1995, water quality started to degrade. Between 1996 and 2003, Crestview invested approximately \$500,000 to identify the source of the poor water quality, and identify options to treat or seal specific water producing zones that were causing the problems. Unfortunately, all options to address the problem were cost prohibitive due to the lack of available space at the existing facility or they would decrease production to a point where the well would be no longer be viable to meet demands.

In the spring of 2006, Crestview drilled Well #6 at 241 Crestview to a depth of 800ft, and destroyed Well #3 that was drilled in 1966 and was located at 589 Avocado Place. Once Well #6 proved operational and a good source, Well #5 was removed from service in October 2007. Since that time, Well #5 has been in "Stand-by" status and not placed into the system.

Now Crestview is looking to drill Well #7 to replace and destroy Well #5. Well #6 was completed for a total cost of \$1.1 million, with Well #7 being estimated to cost \$2.2 million. The reason for the cost difference is Well #6 was drilled to 800ft, Well #7 is expected to be drilled to 1,400ft. Also the land that Well #6 is located on is a 99-year

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lease for \$40,000, where the land for well #7 was purchased for \$505,000 in December 2016. Finally, approximately 1,600ft of 10" Transfermain should be installed to tie Well #7 to the existing Well #4 Transfermain to the Treatment Plant to ensure the best chance for good water quality.

Reasons / Need for Well #7:

Currently, each year between April and November, Crestview is solely dependent on two (2) local groundwater sources, Well #4 and Well #6. If either well experiences a failure during that time, Crestview would experience significant increases in production costs and/or imported water cost due to peaking charges. The reason for the increased costs is Well #4 or Well #6 by themselves do not have enough capacity to meet all system demands during the summer months and water quality from Well #5 is so poor, it can reasonably be used only during the most drastic of emergency situations.

As everyone is aware, we are now in the 7th out of the past 8 years of a continuing drought. The groundwater levels in the Grimes Canyon Aquifer are continuing to decline. In February 2015, Crestview lowered the pump in Well #4 from 580' below ground surface (bgs) to 620' bgs. The effect of this is Well #4's pump is sitting in the perforations zone, exposing the pump to potential water cascading causing aeration and cavitation of the pump bowls. Also if water levels drop another 20', we will have to take the well offline to prevent breaking suction and damaging the pump assembly. At that time, the whole pumping assembly including motor, pump, tube and column will have to be reengineered to accommodate a new and deeper pump setting.

The Well #7 facility would be located at 191 Alviso between the existing Well #4 and the destroyed Well #3 facility (located at 589 Avocado Place, 560 feet west of Well #7), making the geology under the property well known. Additionally, Crestview has two sets of piping immediately in front of the proposed facility. In Alviso Drive there is an existing 8" transite water main for Zone 3 gravity, and a 10" transite transfer main from Well #3 for Zone 2 gravity. With the installation of a Variable Frequency Drive (VFD) the well will be able to produce water for either zone directly which is a huge benefit.

Since the facility will be able to produce water for multiple zones, it makes it an excellent location for a natural gas Emergency Generator. The installation of a Natural Gas Emergency Generator would insure the district could provide water service during an extended power outage such as what was experienced during the Thomas Fire of December 2017. With the Generator being Natural Gas, emissions are lower and overall equipment operation is quieter especially when enclosed in a sound attenuated enclosure. Plus with a natural gas service being installed, there are no concerns about

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refueling if an extended run becomes necessary with no diesel fuel maintenance being required. Other issues to consider, immediately in front of the parcel there is an existing 480-volt Edison power transformer to provide power the facility, and directly behind the parcel is a natural storm water channel for operating the well-to-waste as needed.

Anticipated Method of Operation:

Thanks to large storage reservoirs, Crestview operates all of their pumping equipment at night when electrical rates are at their lowest. Crestview typically start Well #4 and Well #6 at 12:30 am and operate to 9:00 am, 7-days a week from April 1 through November 30 each year. The rest of the time, we take our State imported water from Calleguas because we do not have sufficient groundwater allocation from Fox Canyon GMA to meet all or our demands. During the winter months, the Wells' are offline and in Stand-by mode.

It is anticipated Well #7 would be place into a rotating lead / lead / stand-by rotation with Well #4 & Well #6, where the lead wells are switched each Monday morning when the on-duty Water System Operator changes their Stand-by rotation. An example of the rotation would be Well #4 producing to Zone 3, with Well #6 producing to Zone 2, and Well #7 in Stand-by. The next Monday we would place, Well #7 producing to Zone 3, Well #6 producing to Zone 2, and Well #4 in Stand-by. The following Monday, we would place Well #7 producing to Zone 2, Well #4 producing to Zone 3 and Well #6 in Stand-by.

A 2,000–gallon horizontal chemical storage tank, to hold 12.5% Sodium Hypochlorite Bleach, (NaOCl) would be placed inside a vinyl lined, pre-cast vault that would be sized to hold 125% (2,500 gallons). Currently, Crestview receives 4,000 gallons bulk deliveries of 12.5% Sodium Hypochlorite every 4-weeks during operation. Chemical deliveries would be incorporated into normal delivery routine to minimize traffic disruption and or noise. All deliveries would be during normal business hours of 9:00a to 1:00p Monday – Thursday. The use of NaOCl is for disinfection of the groundwater as required Department of Health Services.

Site, Neighbor and Landscape Considerations:

The site is located at 191 Alviso (APN 152-0-034-106) within a residential neighborhood. Prior to construction starting, Crestview will meet with the Las Posas Hills HOA Architectural Committee to present concept drawings and elevations for all facilities anticipated to be constructed on the parcel. Crestview will notice via mail and phone requesting to meet with each neighbor, within 300 feet of the project location, in

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person to present and discuss any concerns they may have. Distances greater than 300 feet will be addressed via the HOA. As Crestview has operated water production facilities in the neighborhood since 1966, we are well known and have a proven track record as being good neighbors.

BOARD OF DIRECTORS STAFF REPORT

TO: CRESTVIEW BOARD OF DIRECTORS
FROM: ROBERT ERANIO, CONSULTING GENERAL MANAGER
TOPIC: WELL #4 OPTIONS
DATE: JANUARY 24, 2019

RECOMMENDATION: Provide direction to Staff about operational priorities, water system operation and future unbudgeted expenditures.

FISCAL IMPACTS: Being that there are nine different options for Board consideration, potential fiscal impacts are wide ranging: from several thousand dollars per year to in excess of \$1.0 million per year in new recurring expenses. There are also multiple options with one-time expenses associated for Board consideration.

EXECUTIVE SUMMARY: In recent years, Well #4 has provided approximately 45% of the district's groundwater supply, down from 60% in the early 2000's. Water levels, both static and pumping, are continuing to fall in Well #4, and are at a point where it is reasonable to assume that Well #4 will have to be removed from service in CY2019. With the apparent delay in Well #7's construction due to legal challenges, and in anticipation of another "dry" winter, Staff has identified 9 options for how the water system will be operated in the future and is requesting direction about new expenditures that will be incurred in response.

BACKGROUND / ANALYSIS: Each time Crestview embarks on a major capital or significant expense, it provides an opportunity to measure the proposed project operation against our Mission Statement and check the viability of our business model. With Well #7 being delayed for an unknown period of time, the "drought" continuing into an 8th consecutive year, and Well #4 water levels continuing to fall, Staff is being challenged to ensure the continued delivery of water under all circumstances while staying within Board policy and budgetary constraints.

Well #4 was drilled in 1985 to a depth of 1,350 feet. The completed well has a depth of 903' with the top 560' being 16" - black iron blank casing, from 560' - 600', we have 16" - 304 Stainless Steel blank casing and from 603' - 903' is reduced to 12" - 304 Stainless Steel wire screen. This design is considered to have a 50-year useful life due to the existence of black iron being exposed to the water table. By comparison, Wells #1, #2 and #3 were 100% black iron and were decommissioned after only 30 - 35 years due to multiple holes in the casing and falling water levels. Well #6 is 100% Stainless Steel and is considered to be a 100-year facility.

When Well #4 was completed, the static water table was at 494' below ground surface (bgs). Today, the static water table is at 562.82' bgs. Originally, Well #4 was designed for the well pump to be placed at 580' bgs, within the 16" Stainless Steel blank casing. In the fall of 2014, Well #4 broke

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suction due to falling water levels, and in February 2015, the well pump was lowered 40' to 620' bgs. The lowering of the pump resulted in a 40gpm decrease in production and increased the motor demand to 101% of nameplate capacity. The pump suction is now within the well perforations, a practice that is not recommended and can cause permanent damage to the well casing. Since current pumping levels are only 12' above the pump, if water levels do not stabilize or increase during the winter of 2019, Well #4 can be expected to break suction again sometime between June and August. This means the well will have to be removed from service to prevent food grade bearing oil from being pulled into the pump suction, or worse yet, significant damage to the pump itself. If this happens, the facility will not be usable again until water levels return to normal, if ever.

The original plan in case of water levels continuing to fall was two-fold. The first part was the construction of Well #7, with the Well construction being similar to Well #6 in that Well #7 would be completed to the bottom of the aquifer and perforated through the bottom half of the water bearing strata. The second part was envisioned that the Well #4 pump would be dropped another 40', possibly facilitating a larger 300hp motor being installed. While researching the specifics of dropping the pump, Staff identified multiple problems that makes this action significantly more difficult than originally thought. The severity of the issues identified with Well #4 drove Staff to identify other options for the Board's consideration.

Options for Board Consideration

1. Install liner, drop pump level, reduce capacity - most likely requiring a Treatment Plant restart
2. All supply provided by Well #6 during peak with irrigation scheduling of large irrigators
3. Increase size of Well #6 pump and motor with irrigation scheduling of large irrigators
4. 100% Imported Water
5. 70% Well #6, 30% Calleguas, year-round blending to meet peak demands
6. 55% Well #6, 15% Well #4, 30% Calleguas, with irrigation scheduling of large irrigators
7. 40% Well #6, 30% Well #5 with a Treatment Plant restart, 30% Calleguas
8. Consolidate with City of Camarillo
9. Consolidate with Cal-Am

Staff will discuss in greater detail the challenges, benefits, disadvantages and fiscal impacts for each of the 9 options that we are requesting Board guidance and direction. All recurring or new expenses were identified by using the Financial Budget Model and changing assumptions to meet various options. All price comparisons were identified by using the Water Rate Comparison Model that Staff runs in support of District rate increases. The options are not listed in any order of preference, only in that they are listed as Staff identified them.

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OPTION #1 – The current pumping level in Well #4 is at the top of the perforations. As the water table falls, more of the perforations will be exposed, leading to “cascading water” falling into the Well casing. This cascading water will have entrained air that will lead to pump cavitation and the pump will be damaged in short order. To prevent that, we could place a blank liner inside the well casing from 603’ bgs to 700’ bgs, effectively sealing that water production zone. Because the liner will take up space inside the well casing, we would have to reduce the pump size from 8” to 6” and lower the new pump to 690’ bgs. Production capacity would be reduced from the current 950 gpm to an estimated 680 - 700 gpm. This would mean that water from much lower depths that has been sitting for many years would start to be drawn upon. When we lowered the pump in February 2015, Staff noticed a distinct degradation in water quality with chlorine demands increasing due to drawing water from new levels. Staff expects the lower we go into this 33-year old facility, the worse the water quality will be for some unknown period of time, most likely facilitating the restart of the Treatment Plant. Staff believes this option to be a temporary fix, as it does not address the original design issue of having black iron sitting within the water table. The estimated cost for Well #4’s work is \$250,000.

The Treatment Plant was decommissioned in October 2007 and placed into “Stand-by” status. Staff inspected the water treatment facility and identified multiple items that would need to be replaced or and upgraded prior to start up. The filter media would need to be replaced, chemical containment storage would need a new liner, the PLC’s built in 1995 are no longer supported and parts are not available. Other items would also need to be addressed including replacement of face piping, with the estimated cost being \$100,000 and requiring 4 months to complete.

OPTION #2 – Well #6 currently has 103’ of water above the pump bowls with production at 1,100gpm. The water table is approximately 10’ below optimal pump design. Simply turning off Well #4 and using Well #6 to provide 100% of system demands would add approximately \$55,000 in annual electrical costs with another \$10,000 in one-time cost to reactivate the chemical injections systems at the Treatment Plant. Staff would have to work closely with large irrigators to manage watering schedules to prevent overlap of demands. This option would require equipment operation within Restricted Edison hours, thereby requiring the changing of rate tariffs. The likelihood of short-term intermittent water outages occurring is moderate to high with current maximum daily production capacity being limited to 1.584 million gallons per day (MGD), and peak irrigation demands exceeding 1.7 MGD on occasion. This option does not address the lack of production facilities within Zones 3, 3B or 3E where our greatest demands are.

OPTION #3 – The design of Well #6 would facilitate the installation of a larger pump, column pipe and motor to increase production. Well #6 is a 16” – 304 Stainless Steel casing from top to bottom. Currently the pump for Well #6 is 10” in size. We could purchase and install a 12” pump and relocate the 300hp motor from Well #5 to increase production to an estimated 1,400gpm. This production amount is limited by the size of our existing water pipe in Crestview and Valley Vista being 10” transite pipe. Any additional increase in flow would increase the risk of water leaks and main breaks on Ramona Place. Current static pressure on Ramona Place varies from 132 – 145psi, depending upon system operations and Reservoir #2 levels. Increasing flow on Crestview and Valley Vista would increase the pressure on Ramona above the pressure rated capacity of the water lines. This option does not address the lack of production facilities within Zones 3, 3B or 3E where our greatest demands are.

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The increase of 300 gpm over current capacity would not prevent the necessity to operate within Restricted Edison hours, but it would be enough to eliminate the concern of short-term water outages. Staff would still need to develop rotating irrigation schedules to prevent overlap. The estimated cost for this option is \$80,000 for the new pump and column pipe, \$7,000 for new discharge head, \$3,000 to relocate and wire the 300hp motor, \$10,000 for the chemical injection system at the Treatment Plant, for a total of \$100,000 in one-time cost and \$45,000 in increased annual electrical expenses.

OPTION #4 – Import 100% of Crestview's water supply from Calleguas Municipal Water District. This option is straightforward and relatively easy to model as the number of variables is relatively few. This option is presented for consideration because there are multiple local utilities including Cal-American Water, City of Thousand Oaks, California Water Service and the City of Simi Valley operate under this business practice. This option would add approximately \$1.0 million per year in new expenses. There would be cost shifting of lower power costs by not operating our wells, but that would be swallowed by increase imported water costs and new peaking charges for taking water between May 1 and October 1 of each year.

OPTION #5 – 70% water supply from Well #6, 30% of supply from Calleguas. Current operation for Crestview is to operate the wells from mid-April until our annual groundwater allocation is extracted, usually about mid-November. Then Crestview turns off the wells and brings Calleguas water into the district through the winter, until the process repeats again. With the current operating scheme, our wells provide approximately 70% of the total system demand and Calleguas provided the remaining 30%. The difference with this option is when and how we take our imported water.

As great as Well #6 is, it was pointed out in Option #2, Well #6 cannot meet all summertime demands by itself. In this option we would take Calleguas water at a reduced flow rate of approximately 300 gpm at the same time that we run Well #6 to blend to two different waters. When Edison power charges require us to shutdown, we would leave Calleguas on to supply the system. This option would require an upgrade of chlorine injection facilities at the Office and at the Treatment Plant to break the chloramine compound and due to the long travel time within the system. Staff would expect water quality challenges in Zone #2 (Reservoir #2) due to the unequal mixing of chlorine and chloramines. Water quality on the west end (La Marina, Via Zamora, Ashdale) would be inconsistent and prone to taste and odor complaints. This option adds \$96,700 in new expenses, and \$12,000 in one-time costs. This option does not address the lack of production facilities within Zones 3, 3B or 3E where our greatest demands are.

OPTION #6 – 55% Well #6, 15% Well #4, 30% Calleguas. With this option, Well #4 would only operate on the days that our irrigators are watering to meet system demands. The rotation of groundwater to imported water would remain the same; we use Well #4 sparingly. Staff would have to work closely with large irrigators to manage watering schedules and prevent overlapping irrigation demands. In theory, this could work, but since Crestview does not operate in a vacuum, and other pumpers also extract from the same aquifer or basin; water levels most likely will continue to fall until we receive significant rainfall over several years. This option adds \$9,000 in increased electrical rates and is considered a temporary fix that may not even get us through 2019.

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OPTION #7 - 40% Well #6, 30% Well #5, 30% Calleguas – In this option, we would restart Well #5 to replace lost production from Well #4. Since Well #5 is completed into the Pleasant Valley Basin, the water table would allow its use. The Treatment Plant would need the same restoration as Option #1, and due to operational challenges associated with Well #5, Staff would incur overtime each day to babysit the operation of the plant. Water quality would decrease due to color and organic loading of the filters. There is also significant potential we would fail Total Trihalomethane's (TTHM's) and Halo Acetic Acid (HAA5) samples, which would trigger a Tier #1 Maximum Contaminate Level Violation due to the high organic load within Well #5 raw water. This option would add an estimated \$100,000 - \$120,000 in one-time costs with \$25,000 in electrical costs and overtime for Staff or shifting of work schedules.

OPTION #8 – Consolidate and merge with the City of Camarillo. The State of California, State Water Resources Control Board has a stated goal for the consolidation of Small Water Systems into larger Municipal Water Districts due to the increasing complexity of water quality regulations and aging infrastructure costs. Staff could begin the process of consolidation with the City and it is estimated it would take between 2-3 years to complete. Since the City operates wells, it is anticipated Crestview would receive blend of Calleguas and well water similar to Spanish Hills development. The cost to facilitate a merger are not fully identified as several variables exist between the systems including annexation, water meters and inter-connections. Approximately 60% of Crestview's accounts are not annexed to the City, and how that would be addressed is unknown. It is reasonable to assume, if Crestview merged with the City, shareholders would pay the City of Camarillo's water rates for continuing service.

Each year Staff compares Crestview's water rates with surrounding agencies. Since every district has a different rate structure, Staff has developed a model to normalize the data. The model is designed to take a low, average and high demand shareholder and import their annual usage by month into the other districts rate structure to see what the cost difference would be for the same amount of water used. If Crestview were to merge with the City, the average Crestview shareholder would pay approximately 38% more for the same amount of water as they are today. This option would not be completed in time for the upcoming year, but is more of an intermediate objective.

OPTION #9 - Consolidate and merge with Cal-American Water. Cal-American Water has expressed an interest in acquiring Crestview in the past. This option could reasonably be completed within 1-year. Cal-Am operates the neighboring water system in and around the Las Posas Country Club with approximately 600 water service accounts on the north side of the Camarillo Hills. Cal-Am does not operate any wells within its Camarillo or Thousand Oaks Districts so it is not unreasonable to expect that our wells would be turned off and Calleguas would become the predominate water supply for the area. Using the Price Comparison Model, water rates would increase 54% for the average water user. Crestview's Water Rights would most likely be forfeited under this option. This option would not be completed in time for the upcoming year, but is more of an intermediate objective.

Final Thoughts – The idea of a scheduling irrigation for large demand users will not be a simple task. The top 10 (1.6%) individual water demand shareholders account for 11% of all water sales within the company. The idea of irrigation scheduling will not be appreciated. Given Staff's experiences from

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other districts, the policing of the individual shareholders to ensure compliance will be time consuming. The Board has a current policy that the use of information provided by Smart Meters will not be used against a shareholder in how or when they choose to use water. That policy may need to be revisited.

Your water system infrastructure, the location of facilities, current electrical rate tariffs, Staff work schedules, levels of certifications, and how the equipment is operated is already as close as practical to maximum efficiency. This is why even without economies of scale we are able to have the lowest water rates and retain qualified Staff. The business model and the long-standing successes of the Company are being tested by influences outside of Staff's control. Staff will implement whatever option or direction the Board provides, but without Well #4 or Well #7, this is a very different business model. For comparison, Well #7 with a cost of \$2.2 million will add \$44,000 to depreciation, or an additional \$1.50 per share per month for each shareholder.

Crestview Mutual Water Co.

From: Sol Chooljian [REDACTED]
Sent: Thursday, September 09, 2021 4:18 PM
To: Jane Usher; Crestview Water; Doug Off; Laurie Bennett; [REDACTED]
Subject: FW: Permit for Crestview Mutual Water's Well Number 7

From: Murali Rao [mailto:m.[REDACTED]]
Sent: Thursday, September 09, 2021 7:43 AM
To: Sol Chooljian <[REDACTED]>
Subject: FW: Permit for Crestview Mutual Water's Well Number 7

Hi Sol,

FYI, below is the reply from Brian Miller, Chief of Staff to Kelly Long, to my email.

Murali

From: Miller, Brian [mailto:Brian.Miller@ventura.org]
Sent: Thursday, September 2, 2021 11:11 AM
To: [REDACTED]
Subject: FW: Permit for Crestview Mutual Water's Well Number 7

Murali-

Supervisor Long asked me to respond to your recent email expressing support for Crestview Mutual Water Company's application to drill a new water well on Alviso Drive. We appreciate that you took the time to communicate your position and your support is noted.

As you may be aware, this item will be heard before the Board of Supervisors on Tuesday September 14 and would encourage your participation.

Thank you again-

Brian Miller

Chief of Staff

Supervisor Kelly Long, 3rd District

:

From: Murali Rao <[REDACTED]>
Date: September 2, 2021 at 8:40:10 AM PDT
To: "Long, Kelly" <Kelly.Long@ventura.org>
Subject: Permit for Crestview Mutual Water's Well Number 7

Dear County Supervisor Long,

Please approve the permit for Crestview Mutual Water's Well number 7.

I belong to one of the approximately 1000 households in Las Posas Estates that are serviced by Crestview Mutual. As you probably know the community consists of upscale homes on large lots. A majority in the community are your supporters. County planning staff has approved the well design. Crestview Mutual has addressed concerns of residents near the proposed well. An overwhelming majority of households support the well.

I am asking for your support for the following reasons.

1. We need an independent water supply source due to drought and wildfires.
2. Water availability from Calleguas is not guaranteed in case of a fire.
3. Buying water from Calleguas will increase our bills substantially.
4. Property values will decrease if water supply is uncertain.

I hope you will consider the needs of the larger community and approve the permit.

Sincerely,

Murali Rao



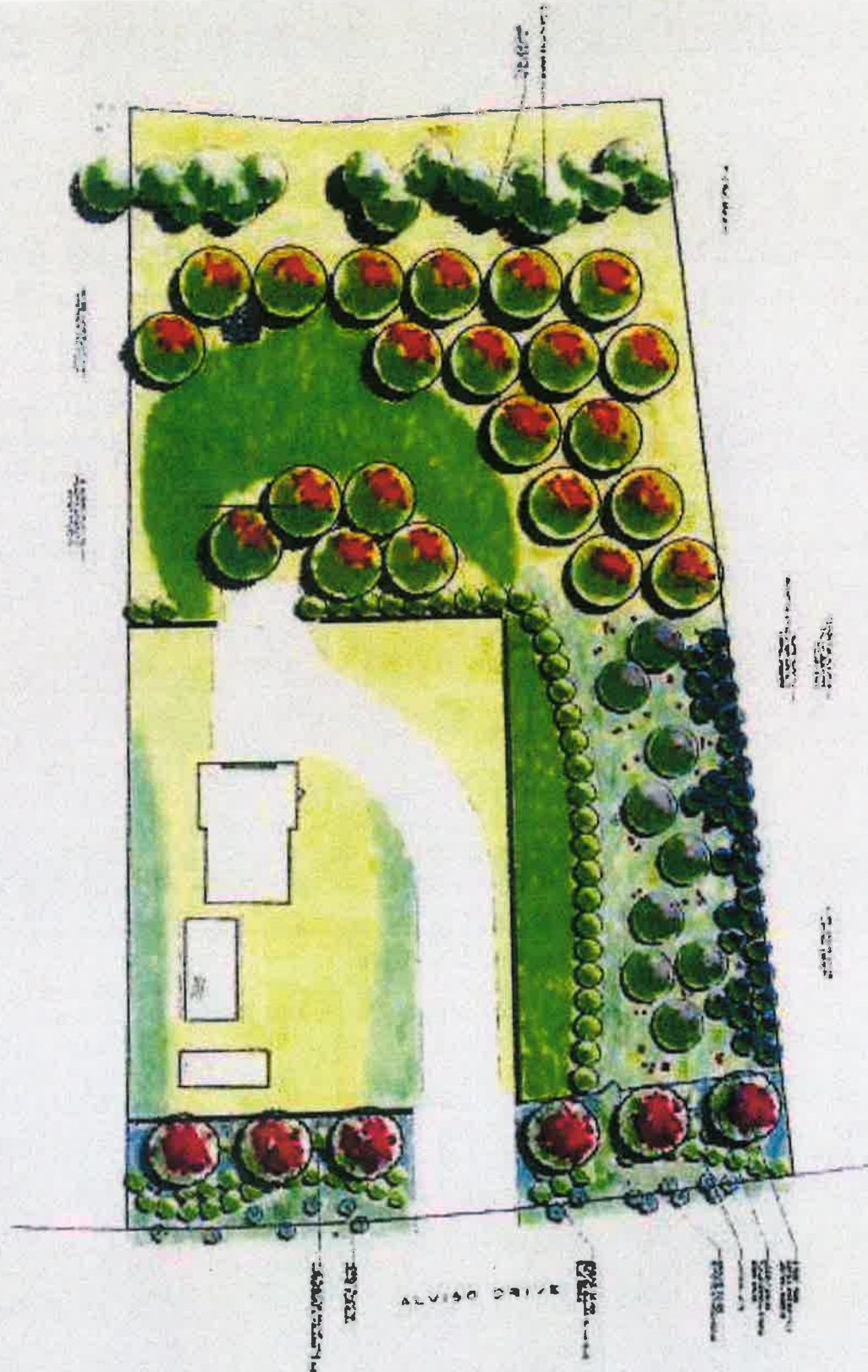
COMMENTS ON CRESTVIEW'S PROPOSED WELL 7

Crestview has done nothing to dispute or mitigate any of the findings upon which the Planning Commission based its denial of the application.

The Applicant failed to prove
to the Planning Commission
that the proposed
development:

- Is compatible with the character of the surrounding, legally established development,
- Would not be obnoxious or harmful or impair the utility of neighboring property uses,
- Would not be detrimental to the public interest, health, safety, convenience, or welfare, and
- Is compatible with the existing and potential land uses in the general area where the development is to be located.

Initially Given To Surrounding Homeowners 9/25/2018





Las Posas Hills Owners Association

C/o Concord Consulting & Association Services, Inc.

888 West Ventura Blvd. Suite C Camarillo

(805) 445-1040 / (805) 445-1373

DearConcord@concordconsulting.net

June 25, 2019

Crestview Water District
C/o Robert Eranio
328 Valley Vista Dr.
Camarillo Ca 93010

Via-email

Re: Architectural Request 191 Alviso

Dear Robert and Board of Directors:

Attached please find a denial for your choice of roofing for your proposed lot at 191 Alviso.

The Association's Architectural Committee voted not to approve your plans based upon the issues as outlined in the attachment.

As you may be aware you are welcome to appeal this decision to the entire Board of Directors at their next meeting.

Sincerely,

On Behalf of the Board of Directors of Las Posas Hills Owners Association

Ruth Cederstrom, PCAM®, CCAM®
Community Association Manager

Encl. BOD

EXHIBIT "A"

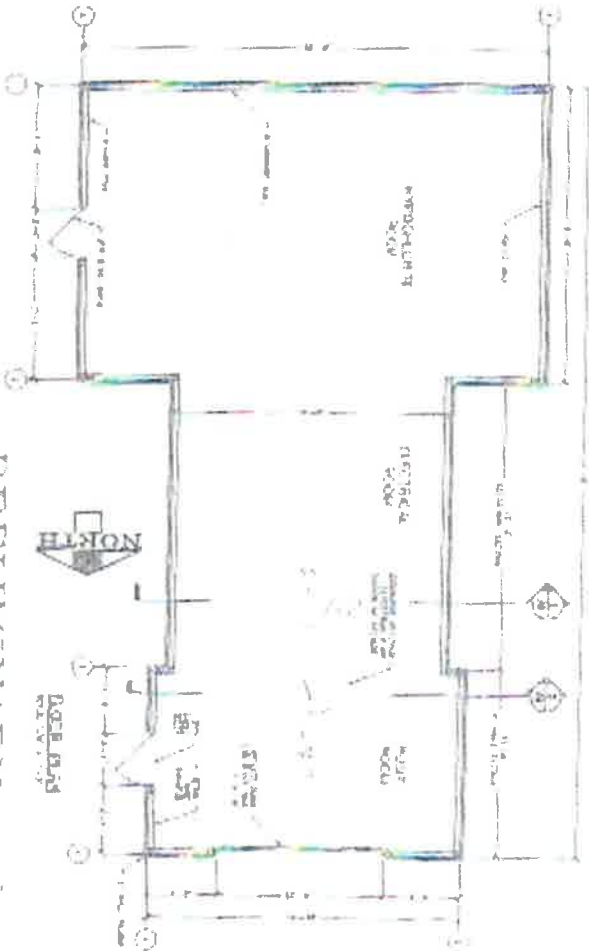
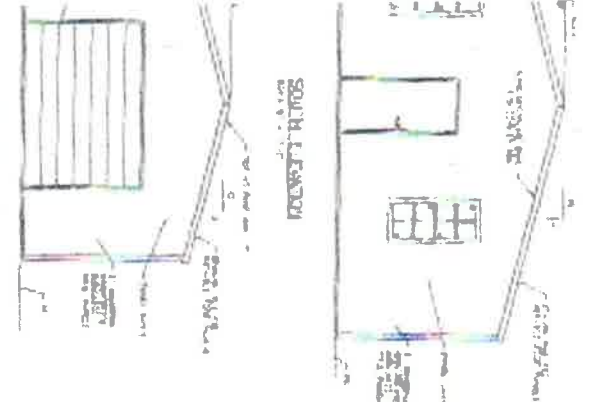
Crestview Mutual Water District Architectural Committee Grounds for Denial:

- Article VIII, Section 1, page 36- Each Lot shall be used exclusively as a private single-family residence. No owner shall use or cause his Lot to be used for any commercial, industrial, storing or other non-residential purposes except citrus or avocado farming.
- Article VIII, Section 5 page 37-Hazardous Activity-No Owners shall permit or suffer anything to be done or kept on his Lot or in the Common Area which will result in cancellation of insurance on the common areas.
- Article VIII, Section 6, page 38- Nuisance. No owner shall permit or do anything on his Lot which will obstruct interfere with the rights of other owners or annoy them by unreasonable noises or otherwise, nor permit any nuisance.
- Article VIII, Section 12, page 40- No derrick or other structure designed for use in boring for water shall be erected, maintained or permitted on any Lot.
- Well within 150' of septic systems
- Metal roof is not approved
- No information submitted for chemical storage close to habitable dwellings.
- Buildings do not conform to the aesthetics of the custom homes in the HOA. The proposed buildings do not look like single family homes, Tuff Shed type structure, not wood or stucco structure. Proposed buildings are inharmonious or out of keeping with the general plan of improvements for the Project or with Improvements erected on neighboring lots.
- Proposed landscaping trees will block views of adjoining homes.
- Proposed Structure does not meet Residence Standards-page 50 set forth in IX section 9
- Sound fencing will block views which is not permitted by the CC& Rs.
- Based upon proposed driveway it appears will need to go into the slope and retaining wall will be required and not proposed.
- Potential over-flowage from the irrigation tank which is to be used if need overflow from the well will exceed the designed flowage from the lot onto the HOA flowage, drainage and equestrian easements.

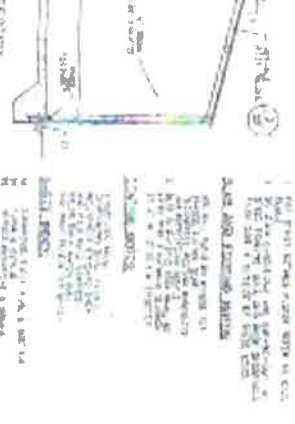
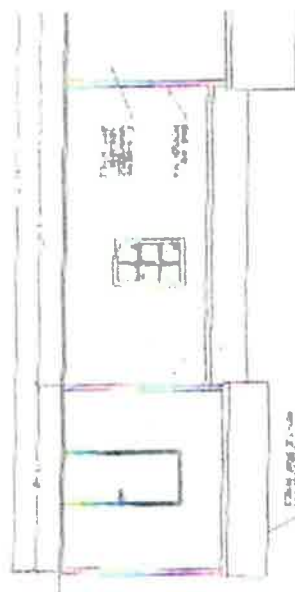
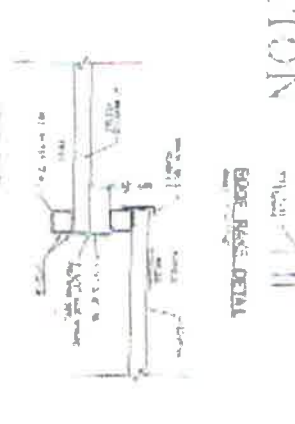
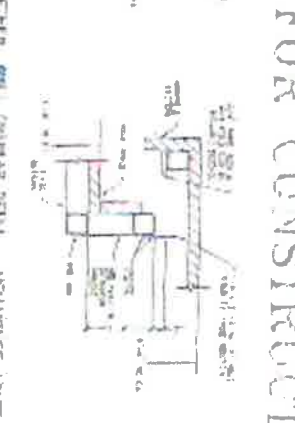
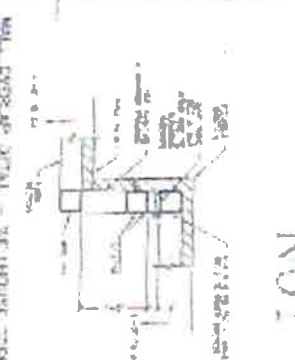
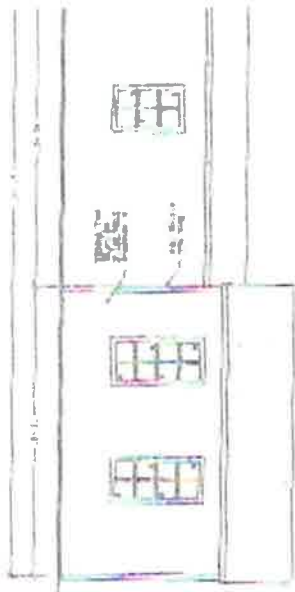
The Planning Commission Rejected the proposed project on a 5/0 vote

The specific facts supporting this finding were as follows:

- The proposed land use and structures for Well No. 7 are inconsistent with established covenants, conditions and restrictions of the Las Posas Hills Homeowner's Association
- Adjacent property owners with existing septic systems within 200 feet of the proposed Well No. 7 would be burdened with the preparation of additional technical studies subject to County review and determination at the time their affected septic systems would need future repair and or replacement.
- 24/7 construction and ongoing operational noise of Well NO. 7 would be a nuisance to neighboring properties.
- The proposed periodic delivery and indoor storage of chlorine for Well No. 7 lacks technical information from the Applicant.
- Nuisance to the community for the proposed grading activities, volume, and truck trips for construction of Well No. 7.



**STEEL BUILDING
MANUFACTURER/ERECTOR:
ROLLAPART BUILDINGS, INC.**
3815 COLUMBIAN ROAD, FALLUM, MN 56040
(773) 411-2820



**PRELIMINARY
NOT FOR CONSTRUCTION**

WEST ELEVATION

NORTH ELEVATION

SOUTH ELEVATION

EAST ELEVATION

SECTION A-A - THROUGH DOOR
E. BUILDING LINE 2

SECTION B-B - THROUGH DOOR
E. BUILDING LINE 2

SECTION C-C - THROUGH DOOR
E. BUILDING LINE 2

SECTION D-D - THROUGH DOOR
E. BUILDING LINE 2

SECTION E-E - THROUGH DOOR
E. BUILDING LINE 2

SECTION F-F - THROUGH DOOR
E. BUILDING LINE 2

SECTION G-G - THROUGH DOOR
E. BUILDING LINE 2

SECTION H-H - THROUGH DOOR
E. BUILDING LINE 2

SECTION I-I - THROUGH DOOR
E. BUILDING LINE 2

SECTION J-J - THROUGH DOOR
E. BUILDING LINE 2

SECTION K-K - THROUGH DOOR
E. BUILDING LINE 2

CLIENT: ROLLA PART BLDG. CORP., INC.		RL ENGINEERING 225 1/2 Maple Drive SW Canton, MN 56001 Phone: (773) 411-2820 Fax: (773) 411-2821 E-mail: rollapart@rl-engineering.com	<div>REVISIONS:</div> <table><tr><th>NO.</th><th>DESCRIPTION</th><th>DATE</th></tr><tr><td>1</td><td>ISSUED FOR PERMIT</td><td>11/11/2011</td></tr></table>	NO.	DESCRIPTION	DATE	1	ISSUED FOR PERMIT	11/11/2011
NO.	DESCRIPTION			DATE					
1	ISSUED FOR PERMIT			11/11/2011					
REPLACEMENT WELL 7 ARCHITECTURAL PLANS									
PROJECT: COLUMBIAN ROAD, FALLUM, MN 56040									

As Presented to Planning Commission

As Presented to Planning Commission



NORTHWEST VIEWPOINT

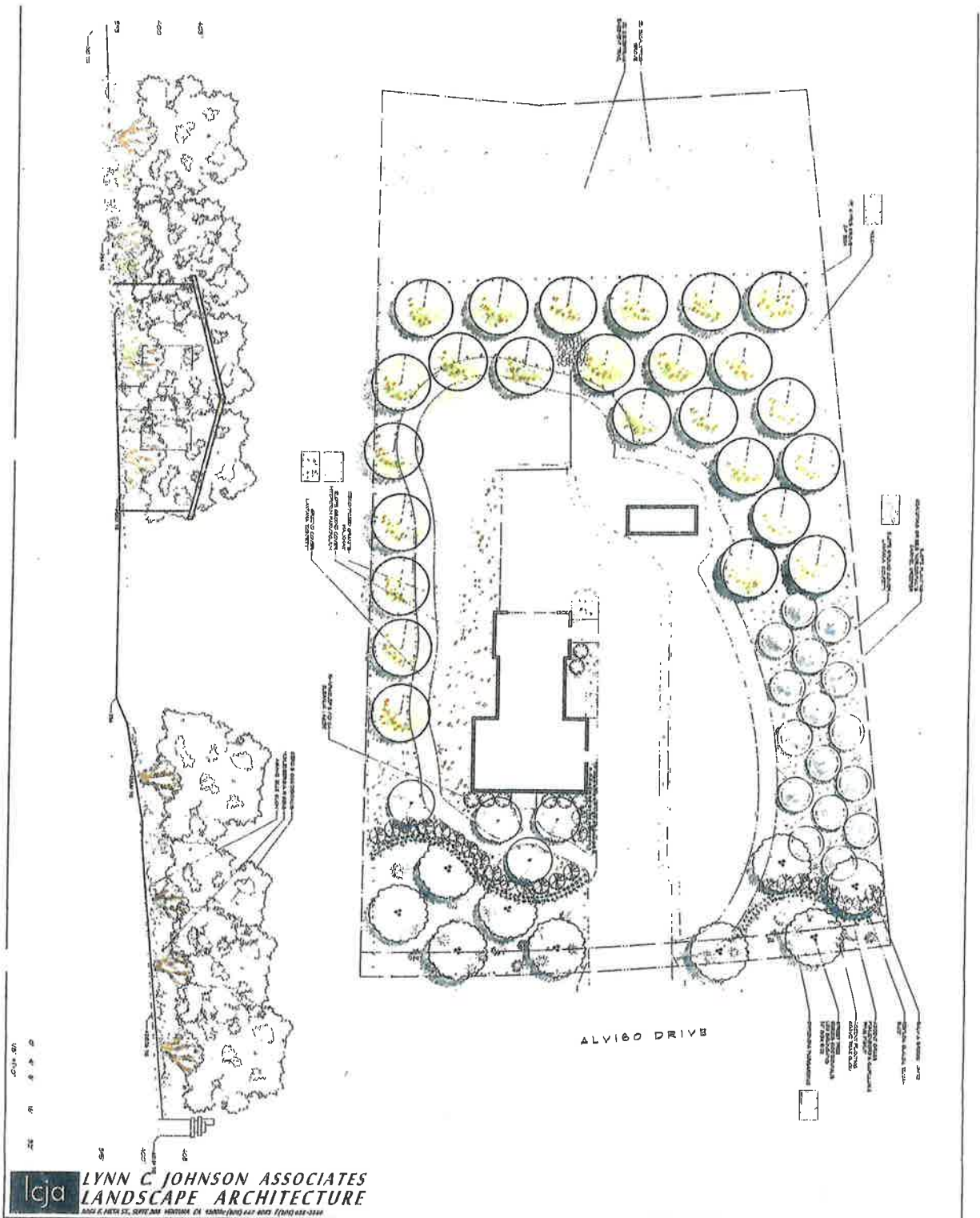
As Presented to HOA Architectural Committee July, 2021
Same Steel Building, Only in White



There is no new evidence to contradict the Commission's finding that the development is 'inconsistent with the established covenants, conditions and restrictions of the Las Posas Hill's Owners Association'

- Crestview agreed to CC&R's when they purchased the lot on 191 Alviso.
- Crestview's proposed well 7 violates 13 parts of the CC&R's including:
 - *No drilling allowed*
 - *Must be single family residence*
 - *11 additional restrictions*
- Placing metal structure in this neighborhood is not compatible with the surrounding development and will be a nuisance and diminish values to neighboring properties.
- Updated views of the proposed well structures were presented to the HOA Architectural Committee on July 26, 2021 and were again rejected.

Note: The Las Posas Hills Owners Association's CC&R's were originally approved by the Board of Supervisors. Were Crestview to attempt to exercise its perceived power of eminent domain it would require a minimum of 4 votes of the Board of Supervisors to condemn the CC&R's.





Las Posas Hills Owners Association

C/o Concord Consulting & Association Services, Inc.

888 West Ventura Blvd. Suite C Camarillo

(805) 445-1040 / (805) 445-1373

DearConcord@concordconsulting.net

July 29, 2021

Crestview Water District

c/o Robert Eranio

328 Valley Vista Dr.

Camarillo Ca 93010

Via-email: reranio.crestview@live.com

Re: 191 Alviso Dr – Architectural Application for pump house and well

To whom it may concern:

The Architectural Committee has reviewed the application received for the installation of a pump house and well at the above referenced address. It was the decision of the Architectural Committee to deny this request based on the items outlined in exhibit 1 attached to the denial.

Thank you for submitting your application. If there are any additional questions or concerns regarding this matter, please submit to Concord Consulting so that they can be addressed by the Architectural Committee or Board of Directors.

Sincerely,

On Behalf of the Board of Directors of Las Posas Hills Owners Association

Danita L. Vaughn, AMS, CMCA, PCAM
Professional Community Manager

EXHIBIT "1"

Crestview Mutual Water District Architectural Committee Grounds for Denial:

- Article VIII, Section 1, page 36- Each Lot shall be used exclusively as a private single-family residence. No owner shall use or cause his Lot to be used for any commercial, industrial, storing or other non-residential purposes except citrus or avocado farming.
- Article VIII, Section 5 page 37-Hazardous Activity-No Owners shall permit or suffer anything to be done or kept on his Lot or in the Common Area which will result in cancellation of insurance on the common areas.
- Article VIII, Section 6, page 38- Nuisance. No owner shall permit or do anything on his Lot which will obstruct interfere with the rights of other owners or annoy them by unreasonable noises or otherwise, nor permit any nuisance.
- Article VIII, Section 12, page 40- No derrick or other structure designed for use in boring for water shall be erected, maintained or permitted on any Lot.
- Well within 150' to 300' of septic systems.
- Chemical storage especially chlorine close to habitable dwellings.
- Buildings do not conform to the aesthetics of the custom homes in the HOA. The proposed buildings do not completely look like single family homes. Proposed buildings are inharmonious or out of keeping with the general plan of improvements for the Project or with Improvements erected on neighboring lots.
- Proposed landscaping trees will or could block views of adjoining homes.
- Proposed Structure does not meet Residence Standards-page 50 set forth in IX section 9
- Sound fencing will block views, which is not permitted by the CC&Rs.
- Based upon proposed driveway it appears will need to go into the slope and retaining wall will be required and not proposed. No new information was presented on July 26, 2021 committee meeting
- Potential over-flowage from the irrigation and overflow tank which is to be used if need overflow from the well will exceed the designed flowage from the lot onto the HOA flowage, drainage and equestrian easements.
- Criteria for architectural committee in Article IX section 4, page 45, states approval may be withheld because of noncompliance with any of the specific covenants, conditions and restrictions contained in the CC&Rs as noted above the proposed plans do not conform to the covenants, conditions and restrictions

Proposed Well Violates State and Local Setback Requirements; Detrimental to the Public Health

- Violates County's and State's 200 ft. and 600 ft. setback requirements from seepage pits/septic systems. These setback requirements were pointed out by shareholders to the Crestview board and staff at a Crestview board meeting.
- Crestview's initial attempt was to circumvent regulation by proposing a 940 ft sanitary seal.
- Seal will crack over time (Nebraska study, Kear Groundwater peer review) allowing for potential contamination with deep fractured strata.
- Project does not contemplate a possible contamination, and Crestview has no procedures in place to address such circumstances.
- On July 22, 2021, Crestview proposed a draft Resolution to offer limited, qualified reimbursement to the property owners with septic systems within 600 ft of the proposed well. This appears to be Crestview's admission that they cannot overcome the future adverse impact on surrounding property owners.

**RESOLUTION 2021 – 01
OF THE BOARD OF DIRECTORS
OF CRESTVIEW MUTUAL WATER COMPANY
TO REIMBURSE QUALIFYING PROPERTY OWNERS
FOR QUALIFYING COSTS AND EXPENSES**

WHEREAS, the Company is a mutual, non-profit water company, and

WHEREAS, Crestview Mutual Water Company (Crestview) is responsible for providing reliable water supply to our shareholders, and

WHEREAS, proposed replacement Well #7 has significant community support, and would provide essential, reliable water at a reasonable cost, without causing noise in excess of applicable noise regulations, and having the same design and appearance as the surrounding homes; and

WHEREAS, Crestview has exhaustively investigated alternative sites in response to the limited but still relevant community opposition to the proposed location of Well #7, and has not identified any alternative site or water delivery solution that can provide essential, reliable water at a reasonable cost; and

WHEREAS, Crestview has commissioned and accepted studies from experts, and has made those studies available to the public, that conclude that there is no expectation that groundwater nitrates or pathogens will be increased or will approach regulatory thresholds as a result of the installation of Well #7 at the proposed 191 Alviso Drive location; and

WHEREAS, Crestview nonetheless wishes to ensure and confirm that the neighbors whose septic systems are located within the regulatory-established 600-foot radius of proposed Well #7 at 191 Alviso Drive will not face any costs or expenses to their septic systems as a result of the location and operation of proposed Well #7.

NOW THEREFORE, BE IT RESOLVED, that if Crestview installs and operates proposed Well #7 at 191 Alviso Drive, the Board of Directors will reimburse the property owners whose septic systems are located within a 600-foot radius of Well #7 from any costs and expenses of providing advanced treatment, and/or such similar septic system treatment costs and expenses that future regulations may require, where those septic system treatment costs and expenses are caused by the location or operation of Well #7.

NOW THEREFORE, BE IT FURTHER RESOLVED, that any property owner who meets the terms of Crestview's reimbursement commitment shall obtain reimbursement by providing Crestview with: (a) a copy of all invoices for reimbursable septic system treatment costs and expenses; (b) a copy of all documents that demonstrate that each such cost and expense was incurred to

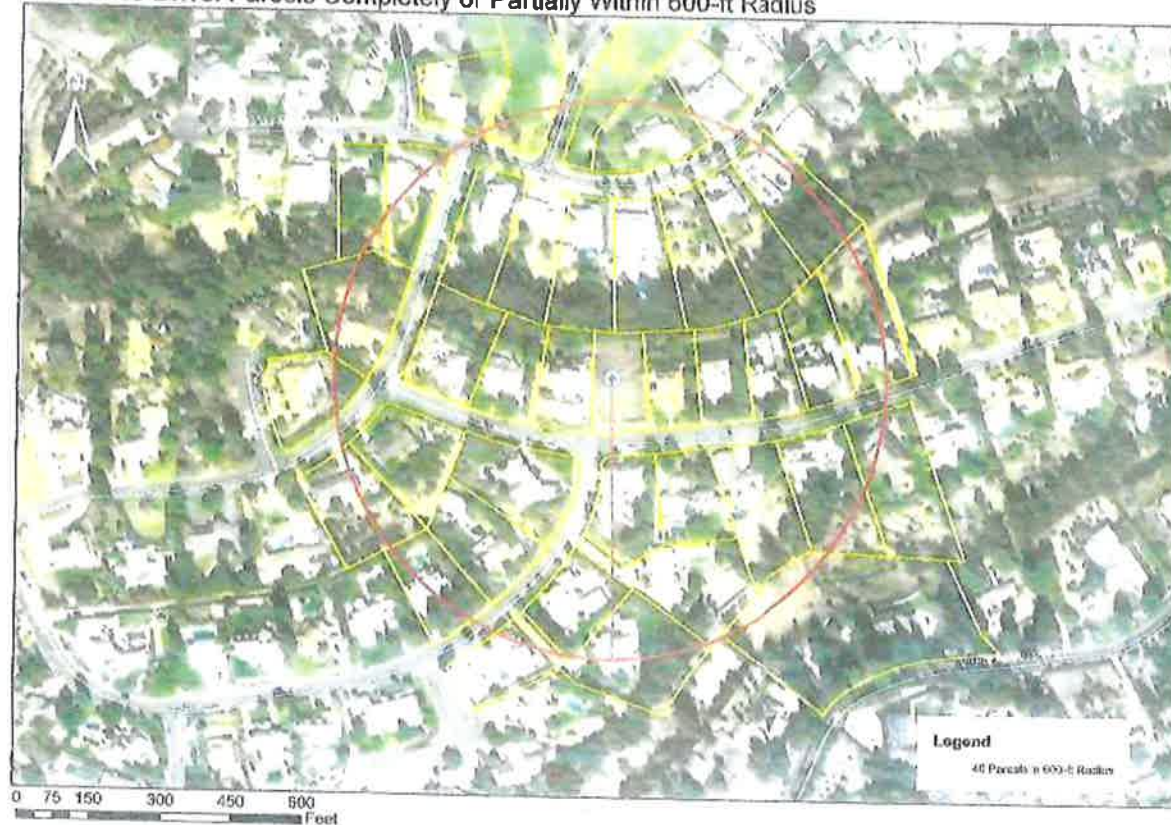
satisfy a regulatory requirement; and (c) a copy of all documents that demonstrate that each such cost and expense was caused by the location or operation of Well #7.

NOW THEREFORE, BE IT ADDITIONALLY RESOLVED, that any dispute that arises hereunder regarding whether or not a property owner qualifies for or is entitled to reimbursement from Crestview shall be submitted by Crestview and the property owner to binding arbitration to a mutually agreeable arbitrator pursuant to the arbitration rules of the American Arbitration Association, and that this arbitration shall be the sole and exclusive remedy.

I, _____, hereby certify that I am the Secretary of Crestview Mutual Water Company, a California Corporation, and that the above resolution was duly and regularly passed at a regularly scheduled meeting of the Board of Directors of said corporation at which time a quorum of said Board was present and voting and which meeting was held on the ____ day of _____, 2021.

Date: _____ Signature: _____

191 Alvise Drive: Parcels Completely or Partially Within 600-ft Radius



Proposed Location of Well #7: Known Seepage Pit Locations with 150-ft Setback



As initially presented to Crestview Board by Shareholders

Crestview's offer of an indemnity cannot protect approximately 30 neighbors from these problems that Well #7 would cause.

- On August 4, 2021, Crestview wrote to 5 neighbors within 200 feet of Well #7 and invited them to meet and comment on a draft indemnity resolution to be adopted by the Crestview board of directors.
- Crestview has invited only the 5 closest neighbors to proposed Well 7 to discuss the resolution (those within 200 ft.).
- A revised draft of this indemnity resolution was presented at the August 26, 2021, Crestview Board meeting, reducing impacted neighbors from 600 feet to 200 feet (in professional dispute).
- The content of the draft resolution with limited liability is totally inadequate to protect homeowners.
- Crestview lacks the financial capacity to perform if even a few of the near neighbors want to replace, or are required to replace, their septic systems.

RESOLUTION 2021 – 0_
OF THE BOARD OF DIRECTORS
OF CRESTVIEW MUTUAL WATER COMPANY
TO REIMBURSE QUALIFYING PROPERTY OWNERS
FOR QUALIFYING COSTS AND EXPENSES

WHEREAS, the Company is a mutual, non-profit water company, and

WHEREAS, Crestview Mutual Water Company (Crestview) is responsible for providing reliable water supply to our shareholders, and

WHEREAS, proposed replacement Well #7 has significant community support, and would provide essential, reliable water at a reasonable cost, without causing noise in excess of applicable noise regulations, and having the same design and appearance as the surrounding homes; and

WHEREAS, Crestview has exhaustively investigated alternative sites in response to the limited but still relevant community opposition to the proposed location of Well #7, and has not identified any alternative site or water delivery solution that can provide essential, reliable water at a reasonable cost; and

WHEREAS, Crestview has commissioned and accepted studies from experts, and has made those studies available to the public, that conclude that there is no expectation that groundwater nitrates or pathogens will be increased or will approach regulatory thresholds as a result of the installation of Well #7 at the proposed 191 Alviso Drive location; and

WHEREAS, Crestview nonetheless wishes to ensure and confirm that the neighbors whose septic systems are located within the regulatory-established 600-foot radius of proposed Well #7 at 191 Alviso Drive will not face any costs or expenses to their septic systems as a result of the location and operation of proposed Well #7.

NOW THEREFORE, BE IT RESOLVED, that if Crestview installs and operates proposed Well #7 at 191 Alviso Drive, then Crestview will reimburse the property owners whose septic systems are located within a 200-foot radius of Well #7 from any costs and expenses incurred in: (a) responding to a regulatory agency request for advanced treatment, (b) providing any regulatory agency-required advanced treatment, and/or (c) such similar septic system treatment costs and expenses that future regulations and regulatory agencies may require; where those septic system treatment costs and expenses are caused by the location or operation of Well #7.

NOW THEREFORE, BE IT FURTHER RESOLVED, that any property owner who meets the terms of Crestview's reimbursement commitment shall obtain reimbursement by providing Crestview with: (a) a copy of all invoices for

reimbursable septic system treatment costs and expenses; (b) a copy of all documents that demonstrate that each such cost and expense was incurred to satisfy a regulatory requirement; and (c) a copy of all documents that demonstrate that each such cost and expense was caused by the location or operation of Well #7.

NOW THEREFORE, BE IT ADDITIONALLY RESOLVED, that any dispute that arises hereunder regarding whether or not a property owner qualifies for or is entitled to reimbursement from Crestview shall be submitted by Crestview and the property owner to binding arbitration to a mutually agreeable arbitrator pursuant to the arbitration rules of the American Arbitration Association, and that this arbitration shall be the sole and exclusive remedy.

I, _____, hereby certify that I am the Secretary of Crestview Mutual Water Company, a California Corporation, and that the above resolution was duly and regularly passed at a regularly scheduled meeting of the Board of Directors of said corporation at which time a quorum of said Board was present and voting and which meeting was held on the ____ day of _____, 2021.

Date: _____ Signature: _____

The Draft Resolution (Indemnification)

- Crestview's draft resolution is wildly deficient as a hold-harmless agreement, or as a defend and indemnify agreement, for these reasons among others:
 - It is only a board resolution that a board could rescind.
 - It is not secured, bonded, or recorded.
 - Crestview does not have the financial capacity on its own to meet the financial obligations such an agreement would entail.
 - It does not include an obligation for Crestview to step in and get the homeowner through the permit process, instead of the homeowner having to find and engage experienced professionals.
 - It does not address how to resolve conflicts over the fastest way to proceed vs. the cheapest way to proceed.
 - It leaves the homeowner in a position of having to negotiate with Crestview about every cost and invoice.
 - It does not propose to reimburse the homeowner for delays in getting more complicated permits, and delay damages may be considerable as in loss of a sale in escrow.
 - It does not compensate the homeowners for diminution in value of their homes for sale or refinancing purposes.
- Etc., Etc.

The existence of Well #7 would place enormous economic burdens on about 30 nearby homeowners with septic systems.

- The Planning Commission found that owners within 200 feet would have to prepare technical studies and be subject to County discretionary action about repairs or replacements of their seepage pits.
- In fact, that would be true of owners within 600 feet, not just 200 feet.
- Depending on the results of the technical studies, the County might decide that the owner could not replace a seepage pit without installing “advanced treatment” at a cost of \$97,480 for installation and \$3,795 annually for operations. (Total \$192,355 over 25 years).
- This risk would “impair the utility of neighboring property uses” to a severe degree.

What is an Advanced Treatment Unit?

- An “advanced treatment unit” (“ATU”) is essentially a private sewage treatment plant required of homeowners whose septic system threatens groundwater, wells, or water supply systems. A typical system looks like this: (see next page)
- Note that it sits above ground. If your septic systems (which are currently below ground) are located at the front of your house, this will be visible from the street. This will also degrade the value of your home.
- These systems and following regulatory procedures are expensive.
- Note that an additional standby generator is required so that the ATU remains functional during power outages.
- Both the ATU’s and the standby generators will need approval by our HOA.

Exhibit E

AdvanTex® Treatment Systems

AX-RT

Manufactured by **Orenco Systems**, Inc.



A number of vacation homes along beautiful Smith Mountain Lake in Virginia treat their wastewater – and protect the lake – with AdvanTex® AX-RT Treatment Systems.

Dependable, Affordable Treatment For Residential & Small Commercial Wastewater



814 Airway Avenue, Sutherlin, Oregon, USA 97479
Toll-Free: 800-348-9843 • +1-541-459-4449 • www.orenco.com

Applications:

- 1-6 bedroom homes (subject to local regulations)
- Small commercial properties
- New construction, repairs
- Tight lots, other site constraints
- Poor soils, shallow bury
- Stringent permit requirements
- Nitrogen reduction, disinfection
- Surface discharge

AdvanTex® - AX-RT Treatment System

Dependable, Affordable Wastewater Treatment, Anywhere!

The AdvanTex® AX-RT Wastewater Treatment System is the latest residential (and small commercial) treatment system in Orenco's AdvanTex line.

AdvanTex systems consistently produce clear, high-quality effluent ... effluent that meets the most stringent permit limits and is ideal for subsurface irrigation and other water-saving uses.¹ That's one reason why AdvanTex won the Water Environment Federation's "2011 Innovative Technology Award." It also won for its low power costs and low operating & maintenance costs. Plus AdvanTex is easy to install, too. Here's why:

Pre-Plumbed Treatment System Saves On Excavation, Installation, O&M

The AX-RT is a compact, "plug and play" wastewater treatment system. It can be shallowly buried and installed right behind a septic tank, as easily as a septic tank.

The AX-RT unit includes the following functional areas of the treatment process:

1. Textile media for advanced treatment
2. Recirculation/blending chamber
3. Gravity or pump discharge to final dispersal
4. Optional Orenco UV unit when disinfection is required

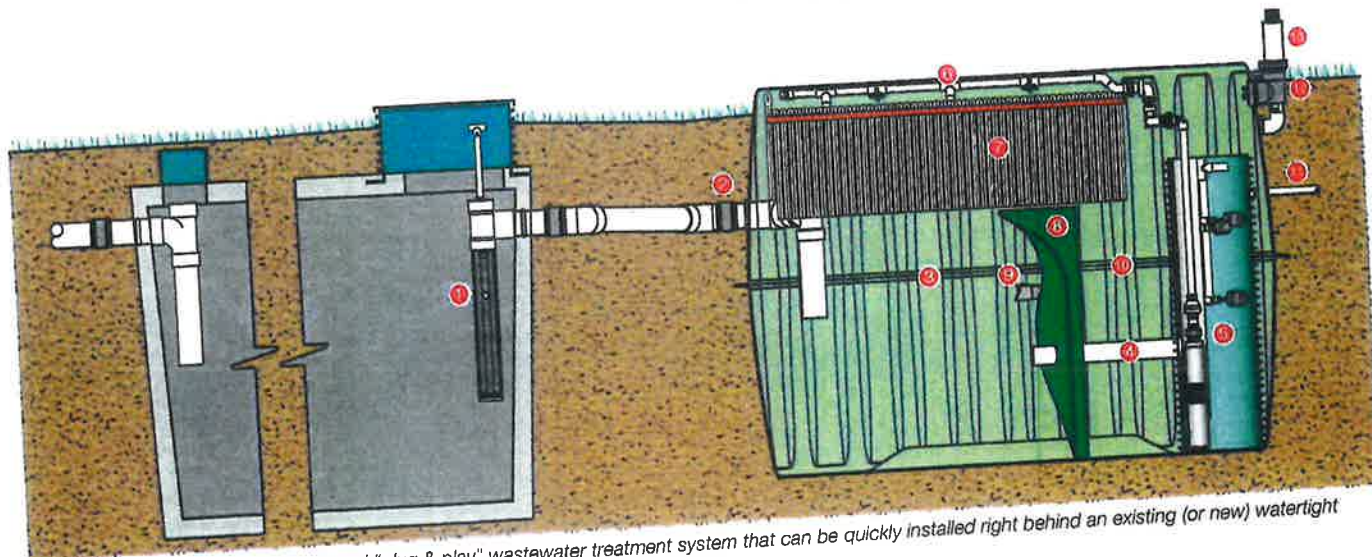
This compact design fits on small lots and reduces costs for excavation and installation. That means property owners can buy AdvanTex quality at a competitive price.



Since 2003, 116 AdvanTex Treatment Systems have been installed in Sunset Bay, a lakefront subdivision in northeast Tennessee, and 23 of these have been AX-RTs. According to **Arthur Helms, Helms Construction**, the RT's are "a lot easier to install. This one only has a few connections, so you can't hardly screw it up." Even better, Helms says that the RT "saves about 8 hours labor and saves on fittings ... I make more money with the RT. I can do it and go on to the next one."

Components

- | | |
|-----------------------------------------------------------------|----------------------------------------------|
| 1. Biotube® effluent filter | 8. Tank baffle |
| 2. Inlet | 9. Recirc return valve |
| 3. Treatment tank - recirc/blend chamber | 10. Treatment tank - recirc/filtrate chamber |
| 4. Recirc transfer line | 11. Outlet |
| 5. Recirc pumping system (discharge pumping system not visible) | 12. Splice box |
| 6. Manifold and spin nozzles | 13. Passive air vent |
| 7. Textile treatment media | 14. Control panel (not shown) |



The AX-RT is a completely prepackaged "plug & play" wastewater treatment system that can be quickly installed right behind an existing (or new) watertight septic tank.

AdvanTex® - AX-RT Treatment System

Low Power Costs, Low Maintenance Costs

No blowers! The AX-RT is passively vented and uses only \$2-\$3 per month in electricity.² Other products can use anywhere from two to five times more!³ AX-RT customers also have low lifetime costs. The AX-RT is designed to be easily maintained with an annual service call, thanks to its accessible, cleanable filters and media. And the AX-RT's high-quality, high-head pumps last 20 years or more!⁴

Homeowner Nancy Smith was the first person to receive a \$400 cash incentive from Energy Trust of Oregon for buying an energy-efficient wastewater system: an AX-RT. Smith's drainfield failed the day before Thanksgiving and she immediately started researching replacement systems. "My determining factor was the electric use," said Smith. "Incomes are going down, expenses are going up ... I have to know going forward what things are going to cost." Smith chose the AX-RT because the annual cost for electricity runs less than \$40; other systems can run as high as \$200 or more.⁵

Consistent, Reliable Performance

Stringent testing programs consistently show that AdvanTex Treatment Systems produce effluent with BOD₅/TSS at or below 10 mg/L and nitrogen reduction of 60-70+%.⁶ In fact, the Maryland Department of the Environment has rated AdvanTex as tops among all "Best Available Technologies" for nitrogen-reduction.⁷



¹ NSF® International Standard 40 Evaluation Report, April 2002 (evaluation performed by NovaTec Consultants, Inc.)

² Assumes electricity costs of \$0.10 per kWh and 3-4 occupants

³ Maryland's "Bay Restoration Fund Ranking Documentation," <http://www.mde.state.md.us/programs/Water/BayRestorationFund/OnsiteDisposalSystems/Documents/BAT%20Ranking%20Document%202016.pdf>

⁴ Elkton, Oregon

⁵ Maryland's "Bay Restoration Fund Ranking Documentation," <http://www.mde.state.md.us/programs/Water/BayRestorationFund/OnsiteDisposalSystems/Documents/BAT%20Ranking%20Document%202016.pdf>

⁶ NSF® International Standard 40 Evaluation Report, April 2002 (evaluation performed by NovaTec Consultants, Inc.)

⁷ http://www.mde.state.md.us/programs/Water/BayRestorationFund/OnsiteDisposalSystems/Pages/water/cbwr/ocds/brf_bat.aspx

The AdvanTex Advantage:

- Reliable, reputable
- Clear, reusable effluent
- No blower; minimal odor
- Complete "plug & play" package
- Easy to install and maintain
- Energy-efficient
- Competitively priced
- For 1-6 bedroom homes



Textile Treatment Media

Spin nozzles microdose wastewater effluent onto highly absorbent textile filters at regular intervals, optimizing treatment.



Ultraviolet Disinfection

Adding our optional UV unit reduces bacteria by 99.999%,⁸ allowing wastewater reuse for irrigation, toilet flushing, etc. (subject to local regulations). It uses no chemicals and has no moving parts. The UV unit is protected in its own chamber inside the AX-RT and just needs a lamp replacement yearly.



Smart Controls

The AX-RT comes standard with Oranco's VeriComm™ remote telemetry control panel and monitoring system. That means service providers can oversee the system from office or home. (Non-telemetry "smart" controls also available.)

⁸ Report prepared by NSF® International, March 2015

AdvanTex® - AX-RT Treatment System

Carefully Engineered by Orenco

Orenco Systems has been researching, designing, manufacturing, and selling leading-edge products for decentralized wastewater treatment systems since 1981. The company has grown to become an industry leader, with about 300 employees and more than 300 points of distribution in North America, Australasia, Europe, Africa, and Southwest Asia. Our systems have been installed in about 70 countries around the world.



AdvanTex® Treatment System
AXN Models meet the
requirements of NSF-ANSI
Standard 40 for Class I Systems.



Powered by

Franklin Electric



814 Airway Avenue
Sutherlin, OR 97479 USA
T: 800-348-9843
T: 541-459-4449
F: 541-459-2884

www.orenco.com

ABR-ATX-AXRT-1
Rev. 1.4, © 04/17
Orenco Systems®, Inc.

Use the AX-RT for Applications Like These ...

Small Lots

In 2011, Mike Madson, a septic system installer in Oregon, replaced a failing system along the beautiful North Umpqua River with an AX-RT. "That particular situation was really, really confining," says Madson. "There was a high bank to the river about 25 feet away and roots everywhere; we had to get things in there in compact fashion. We even had to add a drainfield to the site; the old one was bootlegged in, cedar trees had grown into it, and the leach line was plugged up." The AX-RT incorporates the recirc and discharge processes right within the RT unit, so its smaller footprint made this installation possible.



Nitrogen Reduction

Bob Johnson of Atlantic Solutions has sold (and services) more than 325 AX-RTs, mostly for Maryland's aggressive nutrient-reduction program. The state requires Total Nitrogen of less than 20 mg/L to protect the Chesapeake Bay. After a year of testing 12 RTs under Maryland's BAT (Best Available Technologies) Program, Johnson reports that TN averaged just 14.6 mg/L, while BOD₅/TSS averaged <5 mg/L.⁹ Says Johnson, "When you look at life cycle costs and percent of nitrogen reduction, the AX-RT costs less than other technologies for every pound of nitrogen removed."



Strict Permit Limits

A North Carolina homeowner had a conventional septic system with a drainfield that dispersed into poor soils. When the drainfield failed, the lot was too small to put in a new one, and sewer service wasn't available. The concerned homeowner contacted Kevin Davidson, an engineer with Agri-Waste Technology. He suggested the installation of an AdvanTex AX20-RT unit with UV disinfection. This treatment combination was designed to meet permit limits (< 30 mg/L BOD₅ and TSS; < 200 cfu/mL fecal coliform) without requiring a new drainfield.



Photo courtesy of Kevin Davidson

Davidson was able to use the existing septic tank, and the RT's configuration further reduced costs by eliminating the need for a discharge tank, separate UV basin, and several risers and lids. On the O&M side, he appreciated having the UV sensors integrated into the control panel, especially the one that allows service providers to know the bulb is working without having to pull it out. Said Davidson, "I think the RT is the best unit when you look at aesthetics, installation cost, ability to treat waste, and support from Orenco. Compared to other technologies, I would grade Orenco at the top."

⁹ http://www.mde.state.md.us/programs/Water/BayRestorationFund/OnsiteDisposalSystems/Pages/water/cbwrf/osds/brf_bat.aspx

Distributed by:

Costs of an Advanced Treatment Unit based on contractor bids and County fees for a typical home in Camarillo	Ventura County LAMP
	ATU with full monitoring
Application fee	2,354
Application Services*	22,800
ATU installation	59,476
Emergency generator	12,850
Upfront Capital costs	97,480
Annual Operating Permit Fee	0
Annual preventive maintenance, sampling, lab-testing, and reporting services	3,500
Electricity and repairs	295
Annual costs	3,795
Total costs over 25 years	192,355
<p>*Application Services include an allowance of \$20,000 for "technical studies," which must be performed in order to have any chance of avoiding an ATU requirement. This allowance is based on Crestview's statement in 2020 that it was going to pay that amount for such studies, but we believe it has since spent much more than that.</p>	

- Approx. 30 properties impacted by the septic issue X \$97,480 upfront costs
= \$2,924,400
- Approx. 30 properties impacted by the septic issue X \$192,355 over 25 years
= \$5,770,650
- Based on the previous chart, Crestview Mutual Water Company cannot afford the proposed Resolution they themselves have drafted.
- The current total net assets of Crestview amount to \$5,264,167.00 as of 11/30/2020 based on Independent Accountants' Review Report prepared by Lindsay and Company LLP.
- The cost of Well 7 was initially budgeted at \$1.2 million. Currently Well# 7 is estimated at \$3 - 4 million. There has been no budget adjustment or discussion on financing the budget overruns to the shareholders.
- Crestview does not appear to perform any long-term financial projections or cash flow projections. If they do, they have not been made available to shareholders.

The setback distance and the types of technical studies to be submitted are both stated in Appendix Table H-1 of the County Building Code, specifically Paragraphs (c), (f), and (g) of Footnote 10. Footnote 10(c) reads as follows:

“Where the effluent dispersal system is within 600 feet of a public water well and exceeds 20 feet in depth the horizontal setback required to achieve a two-year travel time for microbiological contaminants shall be evaluated. A qualified professional shall conduct this evaluation. However, in no case shall the setback be less than 200 feet.”

- Crestview has commissioned “transport studies” intended to be relied on in future years by homeowners within 200 feet who apply for seepage pit replacements. However, none of the studies states any conclusion about how far microbiological contaminants will travel in two years, nor does it take into consideration existing horizontal fractures.

APPENDIX TABLE H-1

Superscript numbers refer to footnotes (1) through (10)

LOCATION OF SEWAGE DISPOSAL SYSTEMS

Minimum Horizontal Distance in Feet From:	Building Sewer	Septic Tank ⁹	Disposal Field	Seepage Pit	Subsurface Sand Filtration System	Mound System
Building or Structures ¹	2	5	8	8	8	20 ⁷
Property line adjoining private property	Clear ²	5	5	8	8	10
Private Water supply well on suction line	50 ³	50	100	150	100 ⁸	100
Streams, lakes, tidal waters or ocean waters	50	50	100	150	100	100
Large Trees	--	10	--	10	10	--
Seepage pits cesspools	--	5	5	12	--	--
Disposal Field	--	5	4 ⁴	5	--	--
On site domestic water service line	1 ⁵	5	5	5	5	5
Distribution Box	--	--	5	5	--	--

Pressure public water main	10 ⁶	10	10	10	10	10
Public water well	50 ³	50	150	200 ¹⁰	150-200 ¹⁰	150
Public water systems' surface water intake point	--	--	200-400 ¹⁰	200-400 ¹⁰	200-400 ¹⁰	200-400 ¹⁰

FOOTNOTES TO TABLE CPC APPENDIX H-1

NOTE: When disposal fields or seepage pits are installed in sloping ground, the minimum horizontal distance between any part of the leaching system and ground surface shall be fifteen (15) feet.

When facilities are located near tidal or ocean waters, the horizontal distance shall be measured from the historically most landward location of the beach at the mean high tide elevation. Structures or facilities shall be constructed in accordance with Federal, State and local laws to prevent erosion of the beaches and movement of the mean high tide closer than the horizontal distances specified above.

- (1) Including porches and steps, whether covered or uncovered, breezeways, roofed port-cocheres, roofed patios, carports, covered walks, covered driveways and similar appurtenances.
- (2) See Section 312.3 of the CPC.
- (3) The distance may be reduced to not less than twenty-five (25) feet when approved metallic piping is installed. Where special hazards are involved, the distance required shall be increased as may be directed by the County Health Officer or the Administrative Authority.
- (4) Plus two (2) feet for each additional foot of depth in excess of one (1) foot below the bottom of the drain line (see Section H 601.0 of the CPC).
- (5) See Section 720.0 of the CPC.
- (6) For parallel construction. For crossings, approval by the Administrative Authority is required.
- (7) This distance shall be increased to 30 feet when the system is located upslope of the structure.
- (8) This distance shall be increased to 150 feet when seepage pits are used as a component of the system.
- (9) Includes components of Supplemental Treatment
- (10) Except as provided for in 10 (f) and 10 (g), new or replacement OWTS with minimum horizontal setbacks less than any of the following are not authorized:
 - (a) 150 feet from a public water well where the depth of the effluent dispersal system does not exceed 10 feet in depth.
 - (b) 200 feet from a public water well where the depth of the effluent dispersal system exceeds 10 feet in depth.
 - (c) Where the effluent dispersal system is within 600 feet of a public water well and exceeds 20 feet in depth the horizontal setback required to achieve a two-year travel time for microbiological contaminants shall be evaluated. A qualified professional shall conduct this evaluation. However, in no case shall the setback be less than 200 feet.
 - (d) Where the effluent dispersal system is within 1,200 feet from a public water systems' surface water intake point, within the catchment of the drainage, and located such that it may impact water quality at the intake point such as upstream of the intake point for flowing water bodies, the dispersal system shall be no less than 400 feet from the high water mark of the reservoir, lake or flowing water body.
 - (e) Where the effluent dispersal system is located more than 1,200 feet but less than 2,500 feet from a public water systems' surface water intake point, within the catchment area of the drainage, and located such that it may impact water quality at the intake point such as upstream of the intake point for flowing water bodies, the dispersal system shall be no less than 200 feet from the high water mark of the reservoir, lake or flowing water body.
 - (f) For replacement OWTS that do not meet the above horizontal separation requirements, the replacement OWTS shall meet the horizontal separation to the greatest extent practicable. In such case, the replacement OWTS shall utilize supplemental treatment and other mitigation measures, unless the permitting authority finds that there is no indication that the previous system is adversely affecting the public water source, and there is limited potential that the replacement system could impact the water source based on topography, soil depth, soil texture, and groundwater separation.
 - (g) For new OWTS, installed on parcels of record existing at the time of the effective date of this Policy, that cannot meet the above

In the absence of a favorable professional evaluation of 2-year time travel, no **new** seepage pit can be installed within the 600-foot setback prescribed by Footnote 10(c) without supplemental (advanced) treatment, according to Footnote 10(g).

“(g) For new OWTS, installed on parcels of record at the time of the effective date of this Policy, that cannot meet the above horizontal separation requirements, the OWTS shall meet the horizontal separation to the greatest extent practical and shall utilize supplemental treatment for pathogens as specified in section 10.8 of the State OWTS Policy and any other mitigation measures prescribed by the Authority Having Jurisdiction.”

Replacement seepage pits are more favorably treated under Footnote 10(f):

“(f) For replacement OWTS that do not meet the above horizontal separation requirements, the replacement OWTS shall meet the horizontal separation to the greatest extent practical. In such case, the replacement OWTS shall utilize supplemental treatment and other mitigation measures unless the permitting authority finds that there is no indication that the previous system is adversely affecting the public water source, and there is limited potential that the replacement system could impact the water source based on topography, soil depth, soil texture, and groundwater separation.”

Thus, in the absence of a persuasive professional evaluation of 2-year time travel, no **replacement** seepage pit can be installed within 600 feet of Well #7 without advanced treatment unless the applicant proves two things:

(i) the absence of any indication that the previous system is adversely affecting Well #7, and

(ii) there is limited potential that the replacement system could impact the well.

Meeting both requirements for avoiding advanced treatment when replacing a seepage pit within 600 feet of Well #7 is impossible.

- Until Well #7 is drilled, completed, and in production, it will be impossible to know if it is contaminated by fecal coliform and if so whether any seepage pits in the neighborhood have contributed to the contamination. Well #7 could be contaminated on Day 1.

The reports recently commissioned by Crestview cannot establish that there is limited potential for a replacement seepage pit to affect Well #7, because

- The analyses in the reports are limited to conditions within 200 feet of Well #7, and it is probable that properties between 200 feet and 600 feet are set in fractured ground and are more likely than closer seepage pits to contaminate Well #7.
- Crestview's transport studies make erroneous assumptions that invalidate their results.

Potential Sewer connection requirement

- Surrounding homeowners within 600 ft of the proposed well could find themselves in the position of not being able to get a County permit to repair/replace their septic systems.
- The County sewer policy requires projects within a ½ mile to connect to sewer services if it is available.
- The current sewer service (provided by the City of Camarillo Sanitation District) is located approximately 1,150 linear feet from 191 Alviso Dr.
- Per policy Crestview should pay for the permitting and installation of sewer service to the property owners within 600 ft. of the proposed water well.

SECTION 2 – OWTS LIMITATIONS ON LOCATION AND DENSITY

Consideration of OWTS density, parcel size and potential cumulative OWTS impact issues (e.g., nitrate loading and bacterial loading) is addressed in the County on a case-by-case basis and involves cumulative impact assessments for certain types of locations. Planning, Land Use, and Watershed Protection District (WPD) agencies work cooperatively to identify and incorporate guidelines in areas of special concern due to background nitrate levels in groundwater. Local OWTS limitations are described in the following section.

Section 2.1 - Density and Lot Size

The County of Ventura has a comprehensive environmental land use review process for discretionary projects, including building restrictions and minimum lot size requirements for projects proposing to use OWTS for domestic wastewater disposal. Any subdivision, or discretionary change in land use having a direct effect upon the volume of sewage, shall be required to connect to a public sewer system if available unless an exception is granted. Local OWTS lot size limitations are described in the following section.

1) Ventura County Sewer Policy for Subdivisions:

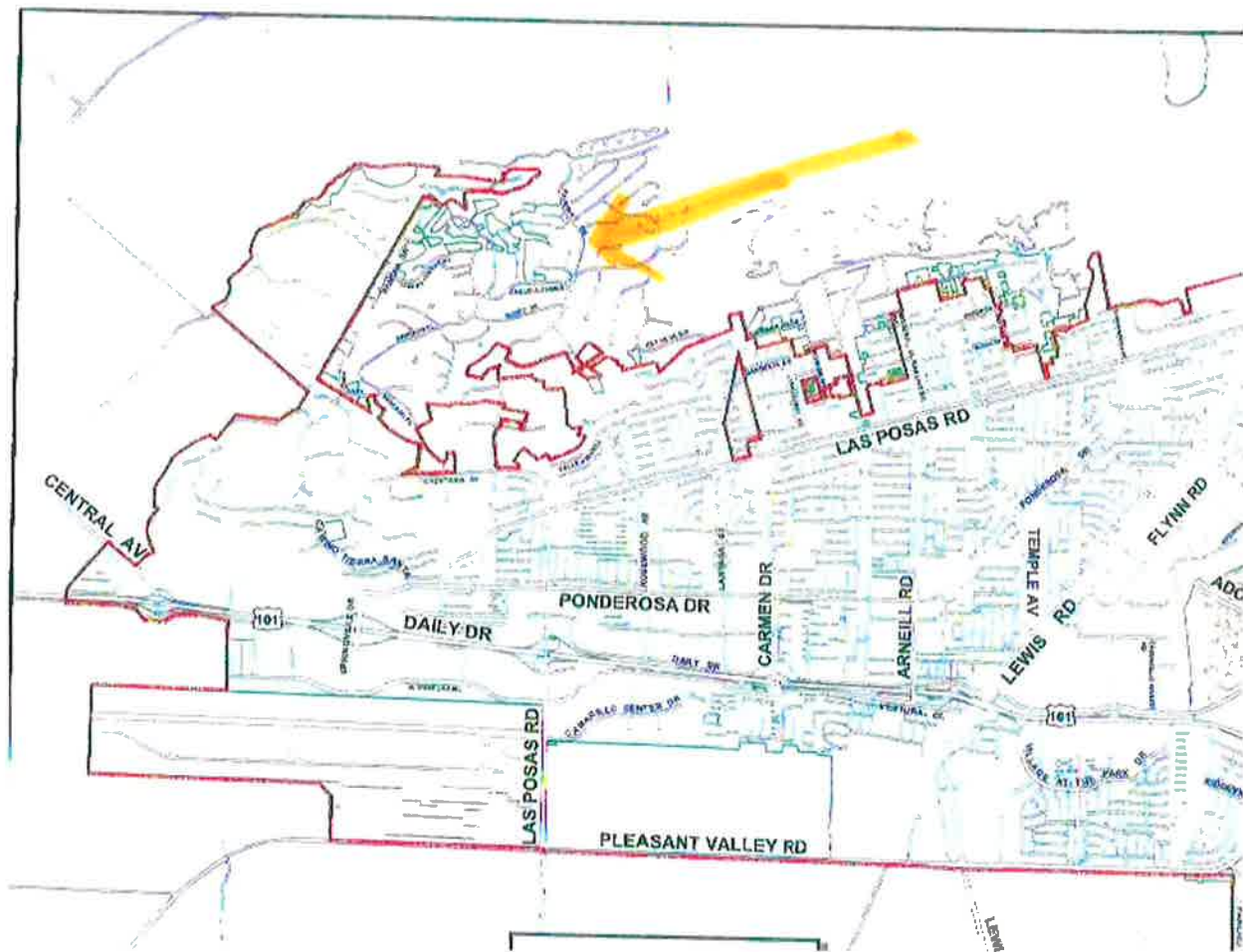
- a. Minimum lot size of 40,000 sq. ft. for residential development (deed restriction allowed to limit to one single family dwelling per lot and decrease the lot size to 20,000 sq. ft.)
- b. Minimum lot size of 20,000 sq. ft. commercial for every 1,500 gallons of OWTS capacity.
- c. Connection to public sewer is required if available within 1/2 mile of the property line.

2) Nitrate Impacted Groundwater Basins:

Projects proposing to utilize OWTS within groundwater basins identified by the County WPD as “nitrate impacted” may be subject to building and lot size restrictions. Restrictions for a project are determined by WPD and are based on their “nitrate formula.”

3) Local Zoning Ordinances:

Ventura County Coastal and Non-Coastal Zoning Ordinances describe lot size restrictions throughout the County. Where zoning regulations require larger lot sizes, those regulations shall take precedent over those described in this LAMP.





1672 Donlon Street
Ventura, CA 93003
Local 805 654-6977
Fax 805 654-6979
www.jdscivil.com

July 23, 2021

Mike Rolls
Alviso Drive
Camarillo, CA.

SUBJECT: VENTURA COUNTY SEWER POLICY

Dear Mike,

The Ventura County Sewer Policy requires connection to the public sewer for all subdivision and discretionary projects requiring new Onsite Wastewater Treatment Systems (OWTS) such as a septic system. While the proposed installation of Well #7 by Crestview Mutual Water Company (Crestview) at 191 Alviso Drive does not require the installation of a new OWTS, it will impact the septic systems of neighboring residents within 600 feet. Because of State drinking water laws, these existing systems will need to be replaced.

The best solution to this impact on the neighboring residences is connecting to sewer per the County's mandate. As you can see on the attached exhibit of the City of Camarillo Sanitation District service area, sewer service is currently provided on Calle Aurora. That current sewer service is located approximately 1,150 linear feet from 191 Alviso Drive. The County Sewer Policy requires certain projects within a ½ mile to connect to sewer service if it is available. Therefore the County Sewer Policy should apply to this discretionary project.

It seems reasonable and within your rights to insist that the County sewer policy apply to this discretionary permit. As a condition of approval, Crestview should pay for the permitting and installation of sewer service to the properties within 600 feet of the proposed water well. This is preferred for the neighboring property owners affected by this project because there will not be the long term maintenance costs associated with advanced treatment septic systems.

In looking at an aerial image of this area, there is a 5 acre vacant property at 640 Fairway Drive that appears to meet the minimum 150 foot setbacks from existing septic systems as required by the State drinking water division (see attached diagram). If not, there is existing sewer service adjacent to this parcel, so the cost of providing sewer to neighboring residences would be much less expensive than providing sewer to the neighbors of 191 Alviso Drive. Placing the water well at 640 Fairway should be examined as an alternative site for the placement of the Crestview Mutual Water Company well.

Let me know if you have any questions regarding this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa Woodburn".

Lisa Woodburn, Vice President, Planning Services

attachments

Crestview cannot meet the Ventura County's Noise Limits

- Noise study performed for Crestview was found to be deficient. Shareholders engaged their own sound consultants who not only found flaws with Crestview's noise study calculations, but also opined that it may not be possible to meet the noise and vibration standards at this location both during construction and normal operations.
- Instead of completing a revision, Crestview found themselves in a position of not being able to meet the County's noise standards and decided to "offload" the problem by outsourcing the noise issue to the well driller, thereby making it part of the driller's problem. Operational noise is not addressed.
- Crestview maintains that there is a "steep daily penalty" and construction shutdown in the event of noncompliance. This "steep" daily penalty was reported in the May 27 General Manager's Staff Report to be \$500. If the driller violated the noise ordinance every day for 45 days, that would be \$22,500, which would be just over one percent of the Zim Industries bid for Well #7. That would not be a substantial deterrent. Drilling will undoubtedly continue illegally.

September 1, 2021

Mike Rolls
PO Box 7909
Ventura, CA 93006

Subject: Review of Noise Impact Assessment Report for Water Well No. 7

Dear Mr. Rolls,

As requested, we have reviewed the *Noise Impact Assessment*, dated April 26, 2019, the *Vibration Impact Assessment*, dated July 29, 2019, and the addendum to these reports, dated October 31, 2019 for the Crestview Mutual Water Company Water Well No. 7 project, prepared by Z Consulting Company. Water Well 7 is proposed for construction at 191 Alviso Drive, which is currently a vacant lot in Ventura County. The lot is bounded by Alviso Drive to the south, beyond which existing residences are located; and by residences to the north, east and west.

The Z Consulting Company report contains an analysis of the noise levels associated with the construction and operation of the project. Our report includes a review of the local noise standards used to assess construction and operational noise, a review of Z Consulting's calculations and assumptions used to estimate noise levels during drilling and operations, and typical noise control recommendations provided in our own noise study reports for drilling projects.

On reviewing the Z Consulting reports, we conclude they contain multiple errors that lead to misleading statements on project's construction and operational noise and vibration impacts. The problems with the analysis include unrealistic assumptions concerning the equipment usage, incomplete construction vibration analysis, and a lack of acoustical requirements for the project's pump house. When these errors and unrealistic assumptions are corrected for, we anticipate that the noise levels during both drilling and operation of Well #7 will exceed the County's noise limits. These issues are discussed in more detail below.

Crestview cannot meet the Ventura County's Noise Limits (cont.)

- Crestview is not sharing the solicitation or the bid information with the shareholders. They posted a letter from their winning bidder on their website but did not post the attachments to that letter. When asked, they turned down the request to release them.
- The winning bidder's predicted noise level of 43 dBA seems overly optimistic. It appears the equipment noise level of 80 dBA at 15 ft is at the low end of a realistic range for this source. Based on a 6 dB decrease per doubling of distance, this source would produce a level of 70 dBA at 50 feet. The wall would therefore need to provide 27 dBA of reduction to achieve 43 dBA at 50 feet.
- The driller thinks this could be achieved because the wall has been rated as STC 27. A realistic reduction might be 15 dBA. The STC rating is just a number that allows products to be compared against each other and is not a good representation of the sound reduction that will be achieved. Once the STC rating of the wall reaches a high enough number, adding additional layers of blankets/absorption is of little benefit. It's possible that additional layers could help slightly, but it is doubtful it will reduce the level by more than a decibel or two.
- Crestview originally offered to move the surrounding homeowners to hotels for 30-45 days because of the anticipated noise issue. That offer was retracted. Now this offer has magically reappeared in Crestview's August 25, 2021 letter to the Planning Director
- Crestview originally offered to hire a contractor to video infrastructure of surrounding neighbors before and after the drilling so Crestview could cover the expenses of any repairs from the vibrations of the drilling of the proposed well. That offer has since been retracted.

September 1, 2021

Mike Rolls
PO Box 7909
Ventura, CA 93006

Subject: Review of Zim Industries Letter to Crestview Mutual Water Company

Dear Mr. Rolls,

We have reviewed the letter concerning the proposed Well 7 and Well 8 drilling noise control from Wes Zimmerer of Zim Industries to Crestview Mutual Water Company, dated August 25, 2021.

The letter claims that the proposed 24-foot temporary sound wall at the sites is assumed to yield a maximum noise level of 43 dBA at a distance of 50 feet from the drilling rig. This claim appears to be an assumption based on an assumed drill rig noise level of 80 dBA at 15 feet (equivalent to a level of 70 dBA at 50 feet), and an assumed wall noise reduction of 27 dBA.

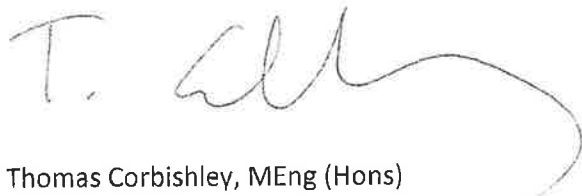
Our personnel have conducted many noise modeling and monitoring studies for water well drilling rigs. The claimed noise level of 43 dBA is much lower than we have measured or modeled on previous well drilling projects. Zim's claimed noise level is not backed up with any field measurement data and seems unrealistic. While a rig noise level of 80 dBA at 15 feet may be realistic, in our experience temporary walls rarely provide more than about 15 dBA of noise reduction. It is possible that Mr. Zimmerer has assumed the wall noise reduction will be equal to its Sound Transmission Class (STC) rating of 27. The STC is a single-value rating that permits comparison of different sound control products. This rating represents the ability of the product to block sound from traveling through it. The actual noise reduction of a wall made from the material is dependent not only on the STC rating, but also the wall's height, the distances of the source and receptor to the wall, the site's topography, and the spectral frequency characteristics of the sound source.

Mr. Zimmerer indicates that if the required noise limits are exceeded, then additional absorptive materials will be added to the wall until the sound level is in compliance. In practice, adding additional materials to a wall is of limited benefit since this does nothing to reduce the noise traveling over the top. It may be possible to reduce noise by a small number of decibels by adding materials to the wall; however, a significant reduction is not to be expected.

Based on the proposed noise control measures in the Zim Industries letter, we expect the rig noise level to be approximately 55 dBA at the nearest residential properties to Well #7. This level would be

consistent with our previous modeling studies and sound monitoring data for water well drilling sites where temporary sound walls have been utilized. Reducing the sound level by an additional 10 dBA to comply with the County's limit of 45 dBA is likely to require mitigation measures applied to the drilling rig itself, although it should be noted that achieving compliance may not be possible.

Sincerely,



Thomas Corbishley, MEng (Hons)
Member, Institute of Noise Control Engineering
Principal Consultant

September 2, 2021

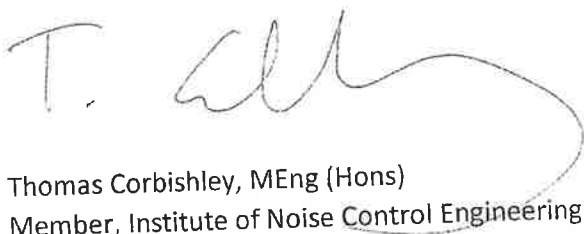
Mike Rolls
PO Box 7909
Ventura, CA 93006

Subject: Vibration Analysis for Drilling at Well #7

Dear Mr. Rolls,

Our review of the Vibration Impact Assessment for Water Well No. 7 and its addendum prepared by Z Consulting in our letter dated September 1, 2021 indicates the project's potential vibration impacts have not been fully addressed. The Z Consulting report considers only vibration caused by the drilling rig and does not provide an assessment of vibration created by the backhoe, crane or concrete mixer proposed for use at the site. Our own analysis indicates that this equipment can cause exceedances of the 0.2 inch per second vibration limit when working within 13 feet of a structure. Due to the close proximity of the adjacent residences, swimming pool and property line walls to the project site, there remains potential for structural damage to these structures unless this issue is addressed. This issue is not addressed in the Zim Industries letter to Crestview Mutual Water Company, dated August 25, 2021, and therefore the vibration issue remains unresolved.

Sincerely,



Thomas Corbishley, MEng (Hons)
Member, Institute of Noise Control Engineering
Principal Consultant

CA Supreme Court Decision

- This process started with Crestview Mutual Water Co. as the applicant requesting approval of a minor modification of Conditional Use Permit (CUP) 4858 to decommission and abandon one of five existing water production, storage, transmission, and distribution facilities, and to construct one replacement water production, storage, transmission, and distribution facility, at a new separate well site location (Case No. PL19-0039).
- There is a recent case: **IN THE SUPREME COURT OF CALIFORNIA PROTECTING OUR WATER AND ENVIRONMENTAL RESOURCES** et al., Plaintiffs and Appellants, v. COUNTY OF STANISLAUS et al., Defendants and Respondents. S251709 that may call into question the lack of CEQA review .
- In this action challenging Stanislaus County's classification of well construction permits the Supreme Court held that the blanket classification of all permit issuances as ministerial was unlawful and that under the ordinance authorizing the issuance of these permits some of the County's decisions may be discretionary.
- Under the California Environmental Quality Act (CEQA), Cal. Pub. Resources Code, 21000 et seq., any government action that may directly or indirectly cause a physical change to the environment is a project, including the issuance of a permit. Projects can be either discretionary or ministerial actions, and discretionary projects general require some level of environmental review, while ministerial projects do not. In this case, Plaintiffs challenged Stanislaus County's practice of categorically classifying a subset of its issuance of well construction permits as ministerial, arguing that the permit issuances are discretionary projects requiring CEQA review. The trial court found the permit issuances were ministerial. The Court of Appeal reversed. The Supreme Court reversed in part, holding (1) Plaintiffs were entitled to a declaration that classifying all issuances as ministerial violates CEQA; but (2) Plaintiffs were not entitled to injunctive relief because they failed to demonstrate that all permit decisions covered by the classification practice were discretionary.

**IN THE SUPREME COURT OF
CALIFORNIA**

PROTECTING OUR WATER AND ENVIRONMENTAL
RESOURCES et al.,

Plaintiffs and Appellants,

v.

COUNTY OF STANISLAUS et al.,

Defendants and Respondents.

S251709

Fifth Appellate District

F073634

Stanislaus County Superior Court

2006153

August 27, 2020

Justice Corrigan authored the opinion of the Court, in which
Chief Justice Cantil-Sakauye and Justices Chin, Liu, Cuéllar,
Kruger, and Groban concurred.

Chemical Storage and Odors

- Crestview states they maintain chemicals in accordance with County Standards and undergoes yearly inspections by the County's Environmental Health Division to ensure full compliance and identify any potential hazards with decades of successful operation.
- Crestview claims their existing facilities do not have the benefit of the advanced design and compatibility measures that have been incorporated into this project.
- These statements and Mr. Eranio's own report do not constitute **technical** information required. No additional information has been provided to explain the "advanced design" or other safety measures.
- No information has been provided to shareholders as to the possibility of cracks in the storage tank due to earthquakes. No information has been provided to shareholders as to the possibility of leaks which can be deadly to surrounding neighbors with pulmonary diseases.
- Liquid chemicals, such as sodium hypochlorite (bleach), if spilled, can leak into other containers or seep into cracks in the floor. Liquids, because of their properties, can create hazards not associated with solid or granular products and must be carefully handled.
- No plan has been made available to surrounding neighbors regarding emergency communication and procedures in the event of a spill. Liquid chlorine causes severe skin burns and eye damage and you should not breathe fumes or vapors.
- It should be noted that Crestview received a Notice of Violation for not completing Annual Haz Mat Training in 2020. However, the training was canceled by the Ventura County Fire Department and the Association of Water Agencies of Ventura County due to COVID. Crestview is currently seeking closure or rescission of that NOV.
- The drill cuttings that Crestview proposes to allow to dry on this property is a flawed approach. No odor or smell analysis for the drying organic soil has been presented. Based on the small size of the lot and 23% slope, together with the flow easement issue, does not allow for this.

Site is too small to drill this size well

- Lot is 24,000 sq ft. approx. 125 X 190. With blue line creek as northern property line and subtracting the equestrian trail, you have less than 18,000 sq ft left.
- We were told they need a flat 10,000 sq ft pad to drill well. With sound blankets needed 8 ft off the property line, there is even less area to maneuver. Some drilling contractors require an additional 200 X 200 ft. to stage equipment.
- Crestview did not submit plan or apply for a grading permit. The lot has a 23-degree slope from street to blue line creek.
- Other property owners along the blue line creek have double retaining walls. Crestview is not building a retaining wall.



Jones Ranch off Vineyard, Oxnard
Depth: 1,250 ft

Limonera water well in Santa Paula



Depth: 1,000 ft




Zim Well drilling in Fresno
Depth: 1,000 ft.







 This Company
declined to bid due to
lot size and drilling
requirements

AT&T 5G E

11:18 AM

77% 



Fw: Available fence area in So...

AA

Jordan Kear


On Monday, July 26, 2021, 2:44 PM. Bryan Adams
<bryan@yjdrilling.com> wrote:

Jordan,

In addition to the 150'X100' drilling area requirement
would there happen to be another space 200'X200'
where we could fence off the store materials etc.?

Is it next to the drilling area or separated by how
far?

Sincerely

Bryan Adams

Bryan Adams

Business Development Manager

WY CO UT NV CA NM TX



Delete



Archive



Move



Reply All



More

Sent from my iPhone

Drilling Equipment

- Crestview has refused to release the specifications for the drilling bids.
- 7 bid requests were issued, 2 bids have apparently been received by the deadline. The General Manager stated the other 5 potential companies did not submit a bid because:
 - *They did not want bonding ties up because of uncertainty going forward*
 - *Price of steel is jumping around*
 - *Just don't have the manpower*
- No information of the bids have been shared with the shareholders.
- Originally, Crestview proposed a TH60 truck mounted drill. Based on the information shareholders have gathered, this project will need flat based rotary drill. This will require more space than the lot at 191 Alviso offers. A TH 60 truck mounted truck will not be large enough to handle the weight of the casings.
- The size of the drill will also determine the noise and vibration issues.
- The winning bidder bid 3 projects at one time: decommissioning Well #5, Drilling Well #7 and Well #8. Well #8 appears to require noticing and other procedural requirements that did not take place. This may require a whole new prevailing wages bidding process. The current bid for Well #7 may be worthless.



**Rig #77
Inventory**

Drawworks:

- 2007 Taylor RT 5000 drawworks rated at 500 HP
- (1) Caterpillar C-15 engines, EPA Tier 3 certified

Mast:

- Taylor RT 5000 square set derrick, 70' high
- 200,000 lbs static hook load

Substructure:

- Height 13.6' with 15' K.B. elevation

Mud Pumps:

- (2) Gardner Denver PZ-7 Triplex pumps
- (2) Detroit 60 series, 600 HP engines, EPA Tier 3 certified
- (2) 5' x 6' x 11' centrifugal charge pumps rated 3000 PSI

Mud System:

- (1) 240 bbl, 3 compartment mud tank.
- (1) 5'x 6'x 11' 50 HP mix centrifugal
- (1) 5'x 6'x 11' 50HP desilter pump with 12 cones
- (2) Fluid system single deck, 4 panel shakers
- (1) Mud cleaner with (8) desilter cones
- (1) 220 bbl mud tank (by request)

Rotary Table:

- DSM 18" rotary table
- 200,000 lbs rotary load

Generator:

- (1) Magnum 235 KW, EPA Tier 3 Certified

Drilling, Tripping Blocks & Swivel:

- (2) McKisick 6 line, 100 ton blocks
- PG 60 Western Rubber, 100 ton swivel

This is what is needed at a drill site. It does not include onsite support equipment such as skip loaders, excavators and trucks.

Crestview has not justified that 191 Alviso will be a 50-year water source.

- Crestview maintains that since Well 4 up the street has been a successful well drilling in this location, with a deeper well, will be more successful. What they do not tell you is that Well #4 was drilled to 1040 ft, but only developed to 930 ft. The perforations are only at 600 ft bgs.
- What they don't say publicly is that Well 4 is not running dry, but deeper placement of the pump will lead to poor quality water, and Well 3 at the bottom of this same street has already been taken out of service due to poor quality water.
- Crestview has secured an additional study to "prove" that there is in fact water at this location, but this study falls short.
- Lowering the pump on Well #4 and rehabilitating it is a low cost, sensible option. Well #5 (a mile away) was also taken out of service due to poor quality water and due to a seismic event.

Crestview has not properly addressed Alternative Sites

- Since 2018, shareholders have repeatedly asked Crestview to review their site study used prior to the purchase of 191 Alviso. All we were told was that 191 Alviso is the best one. No alternative site study was given to the shareholders. Each of the sites suggested by shareholders were rejected by the Crestview general manager, based on his biased opinion, having already purchased 191 Alviso.
- An alternative site study dated July 2021 is being presented by Crestview. There is a lack of analytical financial analysis, leaving severe flaws in the report.
- Why was there no alternative site analysis performed BEFORE the purchase of 191 Alviso in 2015? Once the purchase took place, all efforts were made to solidify the decision to have the well at this site. The Crestview report is not valid as it is biased on all counts.
- No thorough analysis has been performed, as “facts” continue to change regarding the costs and components of the project. The original project contemplated 1400’ of pipe up Alviso to connect to the pipes at Well 4.
- The July 14, 2021 study performed by Dreaming Tree Civil for Crestview is incomplete, does not properly compare alternatives, and does not consider all costs and budget projections.

Alternatives To A New Well at 191 Alviso

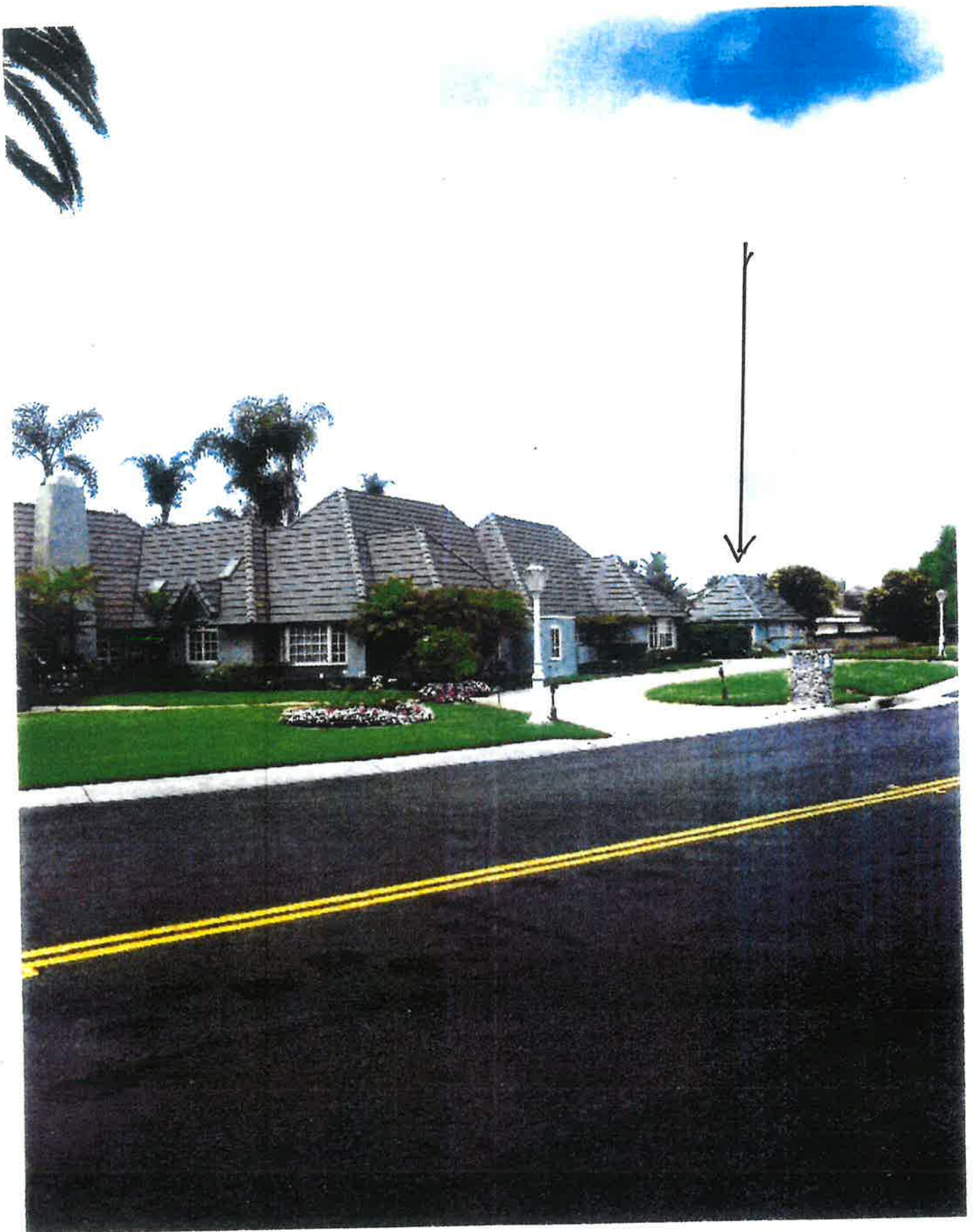
There are at least three obviously better alternatives to drilling Well #7 at 191 Alviso. Crestview has arbitrarily dismissed all of these without serious hydrogeological or engineering analysis or apples-to-apples cost comparisons.

■ Rehabilitation of Well #4

Well #4 was grandfathered in by the original developer, dedicating the land in 1979. The HOA bylaws were put in place in 1981, and Well #4 was drilled in 1985. The developer built Well # 4 to blend into the neighborhood (see picture next slide).

Crestview has stated on several occasions its intention not to abandon Well #4, and it has considered putting a new pump at a lower level and otherwise rehabilitating the well. Crestview's own internal documents show it has estimated that the rehabilitation would cost about \$250,000 — **one-tenth of the cost of its proposed well at 191 Alviso**. However, Crestview has imprudently avoided doing the engineering work that would be necessary to engineer a specific plan and estimate costs.

Well #4 has **NOT** "gone dry" The pump has been set at the maximum depth the low-power pump can handle – it is running at 101% of rated capacity. The well needs a new pump that will draw water at lower depth and some other modifications, all of which are normal in the industry.





Alternatives To A New Well at 191 Alviso (Cont.)

New Well at Las Posas Country Club

- Kear Groundwater originally presented to the Planning Commission the Las Posas Country Club (LPCC) alternative well site as one of the many other available options that do not involve drilling a new well in the middle of a residential neighborhood on a small sloping parcel without adequate human safety setbacks.

- The contention of superior quality at Las Posas Country Club (LPCC) is no longer a claim, it is a fact. LPCC privately drilled its own irrigation supply well in 2021, and the early (not yet fully developed) produced groundwater has an electrical conductivity of 915 $\mu\text{S}/\text{cm}$ vs. an electrical conductivity of 1280 $\mu\text{S}/\text{cm}$ for recent samples at Well No. 4 with no nitrate detected. This agrees with the well- established superior quality of the Fox Canyon Aquifer vs. that of the deeper Grimes Canyon Aquifer. The nitrate concentration is also within regulatory drinking water compliance at the new LPCC well.

Alternatives To A New Well at 191 Alviso (Cont.)

A New Well at 640 Fairway Drive

- This five-acre parcel was presented by the Alliance to Crestview in 2019. The owner attended the May 28, 2019 Board meeting. The Alliance showed Crestview that a review of septic tanks in the area appeared to show this site had promise for a well. There are also existing sewer lines in the street. Mr. Eranio would not acknowledge Mr. Perez, as he stated he had 191 Alviso and there was not need for discussion.
- This site could have saved shareholders thousands of dollars with an easement rather than a site purchase. (Wells #3 and #6 are on easements.)
- The Dreaming Tree Civil report further states that this site does not have a discharge location to accommodate well development water, and over 1,600 LF of 10" line is required to access the Zone 2 reservoir. What this report does not state is that there is already an existing line that brings Well #4 water to Reservoir 3 right in front of the site.
- Headwater can be temporarily be piped off site, as is done in the industry.

Minutes of the Meeting
Of the Board of Directors of
Crestview Mutual Water Company
May 28, 2019

Convened Meeting

The meeting was called to order by President Steve Gill on Tuesday, May 28, 2019, at 4:00 p.m. at the Corporation office.

Attendance and Quorum

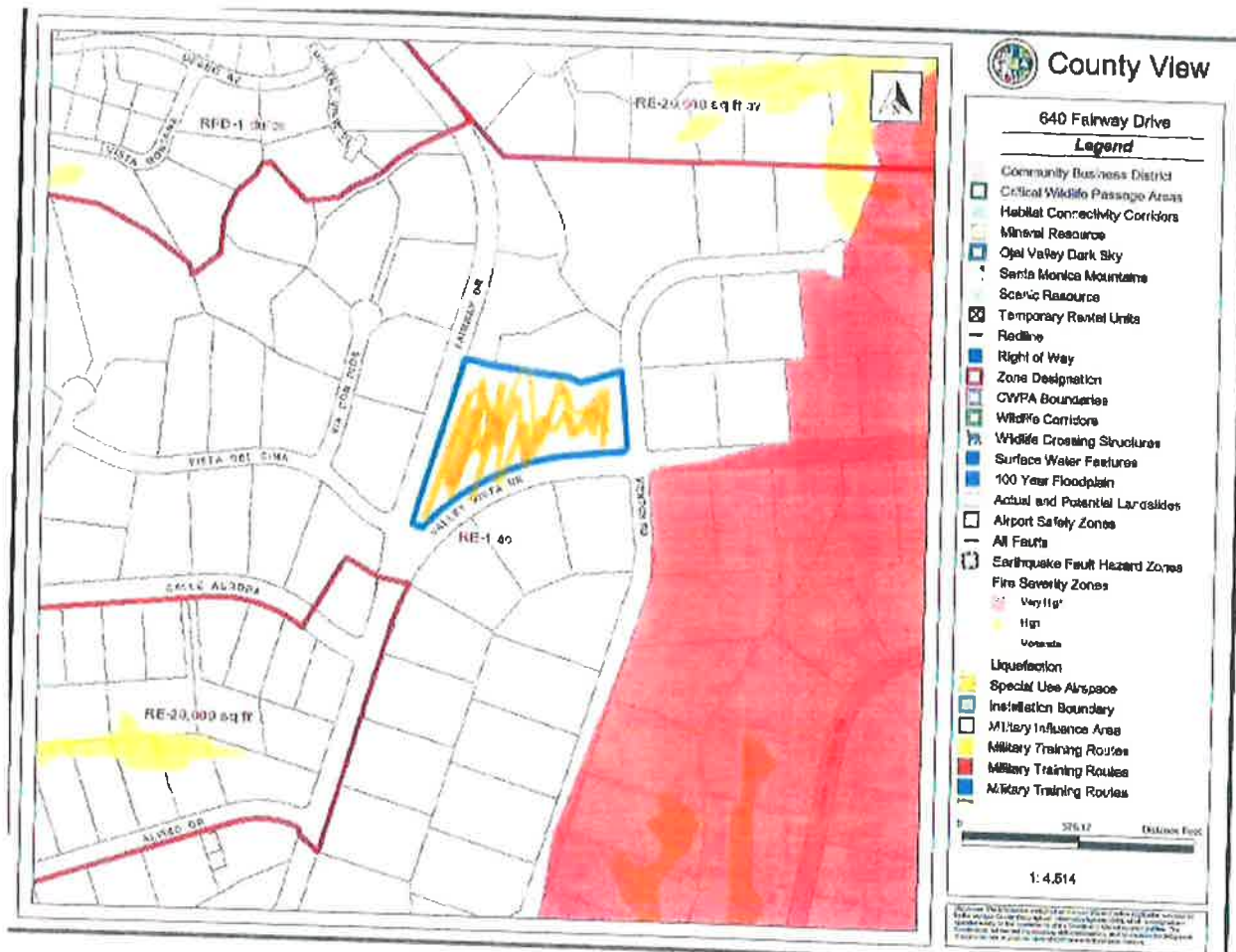
Directors Present: Steven Gill – President
Sol Chooljian – Vice President
Doug Off – Treasurer
Roger Whitlock – Secretary

Directors Absent: None

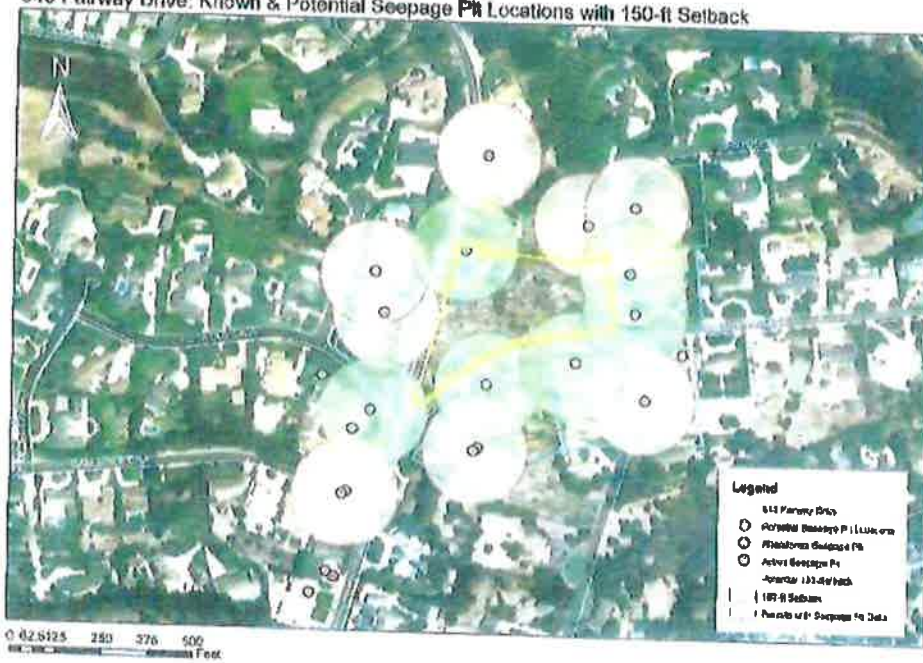
Others Present: Robert Eranio – General Manager
Lauri Marino – Office Manager
Gregory Patterson – Corporate Counsel: Musick, Peeler & Garrett
Christine Cohen – Shareholder: La Patera Drive
Michael Derr – Shareholder: La Patera Drive
Jeff Douglas – Shareholder: Encino Avenue
Jim Lingl – Shareholder: Estaban Drive
Alma Quezada – Shareholder: Lopaco Court
Alberto Perez – Shareholder: Fairway Drive
Mike Rolls – Shareholder: Alviso Drive
Susan Rolls – Shareholder: Alviso Drive
Steve Waldron – Shareholder: Avocado Place

Shareholder's Public Forum

Michael Derr (La Patera Drive) asked about the presence of gophers at Crestview's Well #7 site (191 Alviso Drive) and the ongoing nuisance to neighboring residences. General Manager Robert Eranio reported that traps were purchased and will be set and monitored to address this issue. Michael Rolls (Alviso Drive) asked about the status of Well #4. Robert replied that the recovery of this well is poor. Mr. Rolls asked about the succession plan for resigned Board members. Vice President Sol Chooljian (Encino Avenue) replied that this process is a work in progress. Discussion ensued regarding the status of Crestview's current wells. Well #5 was placed in standby operation in 2007 due to poor water quality. Further discussion ensued. Michael Derr stated that drilling a well *anywhere* is an unknown, potentially resulting in poor water quality. Robert Eranio responded that in 1993, at the time of drilling, the hydrogeology was unknown for Well #5. Crestview has much more information now regarding the hydrogeology for Well #7, this well site is not in the area of any earthquake faults, and is expected to produce good quality water due to its location in relation to the former Well #3 and Well #4.



640 Fairway Drive: Known & Potential Seepage **PI** Locations with 150-ft Setback



Yanco Mall - Albert's property

7/27/2021

Dreaming Tree Report Re

Site 4: 640 Fairway Drive

The property is occupied by a residence with the remainder built out with a planted orchard. The property has a favorable slope; however, lot or easement size would be limited to the owner's discretion. As with Site 1, either a lot split or easement would require County permitting, legal descriptions, survey, recordation and County approval. Further, this location does not have a discharge location to accommodate well development water and over 1,400 L.F. of 10" line is required to access the Zone 2 reservoir.

Site 6: 2711 Goldenspur

This location shows substantial available area (57-acre parcel) which can accommodate access, deliveries, and maintenance. Slope and access are reasonable; however, a lot split or easement would be required. The property has an existing agricultural well, which has not been in use for approximately a decade. The well drillers log, Attachment 3, is not favorable with poor drawdown and yield characteristics; the well water level dropped almost double within the 6-hour testing period and maintained a nominal 350 gpm flow rate. Additionally, the property is located very near the Springville Fault, along the margins of the groundwater basins (between Las Posas Valley Basin and the Pleasant Valley Basin). Wells located in these regions tend to maintain poor water quality and low capacity. The County recognizes these marginal regions as questionable and potentially not characterized as firm well supply zones which require extensive well testing (Category 1 Wells per the VCWWM Section 2.12).

D. Conclusion

As contrasted with the proposed 191 Alviso Drive location, all other possible new well locations vetted within Crestview's service boundaries have limitations or significant disruptions associated with their locations, making them not viable alternatives.

Upon review of the siting criteria and the site alternatives matrix, it is my professional opinion that Site 9 at Alviso Drive maintains the highest level of acceptable criteria and is the most operationally feasible and fiscally efficient location for the replacement Well #7 Project.

Please feel free to contact me if you have any questions regarding the enclosed.

Sincerely,

Heather O'Connell, PE, CFM, QSD
President/Principal Engineer
Dreaming Tree Civil, A Ca. Professional Corporation



7/19/21

Attachments following

BOARD OF DIRECTORS WHITE PAPER

TO: CRESTVIEW MUTUAL BOARD OF DIRECTORS
FROM: ROBERT ERANIO, CONSULTING GENERAL MANAGER
TOPIC: WELL #7 CAPITAL PROJECT
DATE: JUNE 19, 2018

Recommendation: To receive the report, as this will assist the Board in its decision-making on how best to proceed with the proposed Well #7 project, fitting within the company's mission statement.

Fiscal Impacts: Future project costs are estimated at \$1.8 million dollars to complete. If approved at this meeting, costs impacts between approval and end of the fiscal year would equal approximately \$30,000. Total costs spent to date equal \$515,000.

Background / Analysis: Crestview Mutual Water was formed in March 1950. Since that time, Crestview has drilled 6 production wells or roughly one every 15-years. In 1982, Well #4, (located at 6 Alviso Drive) was drilled to a depth of 1,400ft and it quickly became the primary source of water for the district. In the summer of 1993, Crestview drilled Well #5 located at 602 Valley Vista Drive, Camarillo to a depth of 1,800ft. In May 1995, Well #5 was started to production and by the fall of 1995, water quality started to degrade. Between 1996 and 2003, Crestview invested approximately \$500,000 to identify the source of the poor water quality, and identify options to treat or seal specific water producing zones that were causing the problems. Unfortunately, all options to address the problem were cost prohibitive due to the lack of available space at the existing facility or they would decrease production to a point where the well would be no longer be viable to meet demands.

In the spring of 2006, Crestview drilled Well #6 at 241 Crestview to a depth of 800ft, and destroyed Well #3 that was drilled in 1966 and was located at 589 Avocado Place. Once Well #6 proved operational and a good source, Well #5 was removed from service in October 2007. Since that time, Well #5 has been in "Stand-by" status and not placed into the system.

Now Crestview is looking to drill Well #7 to replace and destroy Well #5. Well #6 was completed for a total cost of \$1.1 million, with Well #7 being estimated to cost \$2.2 million. The reason for the cost difference is Well #6 was drilled to 800ft, Well #7 is expected to be drilled to 1,400ft. Also the land that Well #6 is located on is a 99-year

CRESTVIEW BOARD OF DIRECTORS
WELL #7 PROJECT
JUNE 15, 2018
PAGE 2

lease for \$40,000, where the land for well #7 was purchased for \$505,000 in December 2016. Finally, approximately 1,600ft of 10" Transfermain should be installed to tie Well #7 to the existing Well #4 Transfermain to the Treatment Plant to ensure the best chance for good water quality.

Reasons / Need for Well #7:

Currently, each year between April and November, Crestview is solely dependent on two (2) local groundwater sources, Well #4 and Well #6. If either well experiences a failure during that time, Crestview would experience significant increases in production costs and/or imported water cost due to peaking charges. The reason for the increased costs is Well #4 or Well #6 by themselves do not have enough capacity to meet all system demands during the summer months and water quality from Well #5 is so poor, it can reasonably be used only during the most drastic of emergency situations.

As everyone is aware, we are now in the 7th out of the past 8 years of a continuing drought. The groundwater levels in the Grimes Canyon Aquifer are continuing to decline. In February 2015, Crestview lowered the pump in Well #4 from 580' below ground surface (bgs) to 620' bgs. The effect of this is Well #4's pump is sitting in the perforations zone, exposing the pump to potential water cascading causing aeration and cavitation of the pump bowls. Also if water levels drop another 20', we will have to take the well offline to prevent breaking suction and damaging the pump assembly. At that time, the whole pumping assembly including motor, pump, tube and column will have to be reengineered to accommodate a new and deeper pump setting.

The Well #7 facility would be located at 191 Alviso between the existing Well #4 and the destroyed Well #3 facility (located at 589 Avocado Place, 560 feet west of Well #7), making the geology under the property well known. Additionally, Crestview has two sets of piping immediately in front of the proposed facility. In Alviso Drive there is an existing 8" transite water main for Zone 3 gravity, and a 10" transite transfer main from Well #3 for Zone 2 gravity. With the installation of a Variable Frequency Drive (VFD) the well will be able to produce water for either zone directly which is a huge benefit.

Since the facility will be able to produce water for multiple zones, it makes it an excellent location for a natural gas Emergency Generator. The installation of a Natural Gas Emergency Generator would insure the district could provide water service during an extended power outage such as what was experienced during the Thomas Fire of December 2017. With the Generator being Natural Gas, emissions are lower and overall equipment operation is quieter especially when enclosed in a sound attenuated enclosure. Plus with a natural gas service being installed, there are no concerns about

CRESTVIEW BOARD OF DIRECTORS
WELL #7 PROJECT
JUNE 15, 2018
PAGE 3

refueling if an extended run becomes necessary with no diesel fuel maintenance being required. Other issues to consider, immediately in front of the parcel there is an existing 480-volt Edison power transformer to provide power the facility, and directly behind the parcel is a natural storm water channel for operating the well-to-waste as needed.

Anticipated Method of Operation:

Thanks to large storage reservoirs, Crestview operates all of their pumping equipment at night when electrical rates are at their lowest. Crestview typically start Well #4 and Well #6 at 12:30 am and operate to 9:00 am, 7-days a week from April 1 through November 30 each year. The rest of the time, we take our State imported water from Calleguas because we do not have sufficient groundwater allocation from Fox Canyon GMA to meet all of our demands. During the winter months, the Wells' are offline and in Stand-by mode.

It is anticipated Well #7 would be placed into a rotating lead / lead / stand-by rotation with Well #4 & Well #6, where the lead wells are switched each Monday morning when the on-duty Water System Operator changes their Stand-by rotation. An example of the rotation would be Well #4 producing to Zone 3, with Well #6 producing to Zone 2, and Well #7 in Stand-by. The next Monday we would place, Well #7 producing to Zone 3, Well #6 producing to Zone 2, and Well #4 in Stand-by. The following Monday, we would place Well #7 producing to Zone 2, Well #4 producing to Zone 3 and Well #6 in Stand-by.

A 2,000-gallon horizontal chemical storage tank, to hold 12.5% Sodium Hypochlorite Bleach, (NaOCl) would be placed inside a vinyl lined, pre-cast vault that would be sized to hold 125% (2,500 gallons). Currently, Crestview receives 4,000 gallons bulk deliveries of 12.5% Sodium Hypochlorite every 4-weeks during operation. Chemical deliveries would be incorporated into normal delivery routine to minimize traffic disruption and or noise. All deliveries would be during normal business hours of 9:00a to 1:00p Monday – Thursday. The use of NaOCl is for disinfection of the groundwater as required Department of Health Services.

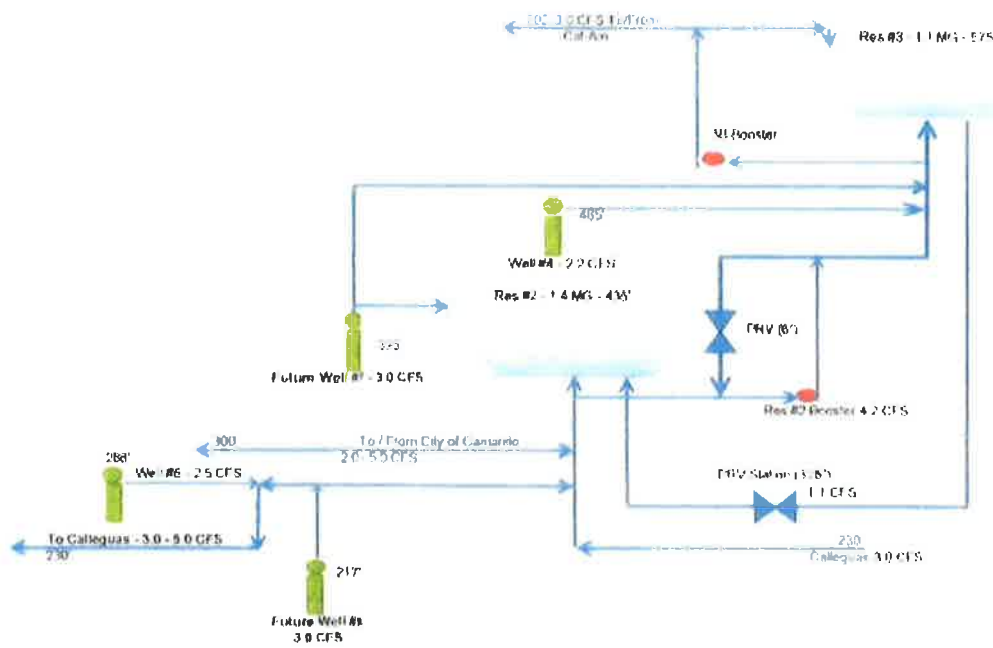
Site, Neighbor and Landscape Considerations:

The site is located at 191 Alviso (APN 152-0-034-106) within a residential neighborhood. Prior to construction starting, Crestview will meet with the Las Posas Hills HOA Architectural Committee to present concept drawings and elevations for all facilities anticipated to be constructed on the parcel. Crestview will notice via mail and phone requesting to meet with each neighbor, within 300 feet of the project location, in

**CRESTVIEW BOARD OF DIRECTORS
WELL #7 PROJECT
JUNE 15, 2018
PAGE 4**

person to present and discuss any concerns they may have. Distances greater than 300 feet will be addressed via the HOA. As Crestview has operated water production facilities in the neighborhood since 1966, we are well known and have a proven track record as being good neighbors.

**Crestview Mutual Water
System Schematic**



Lack of Communication and Dishonesty

- With its invitation to participate in a survey, Crestview gave out a dishonest description of the project. Shareholders were not told there is any issue about noise or septic systems. Shareholders were not told that the project has been rejected by the HOA as inconsistent with the CC&Rs or the specific grounds on which the Planning Commission rejected the CUP application. The shareholders were led to believe that there is no alternative to Well #7 at 191 Alviso, when of course there is.
- Crestview has done everything in its power to withhold information from shareholders who have a vested interest.
- Crestview has moved information regarding proposed Well 7 to the Executive Session of their monthly agendas.
- Crestview has limited the answers to questions posed by shareholders and has obfuscated issues thereby misleading shareholders.
- Crestview has sent out letters to their shareholders using scare tactics and intimidation to divide the shareholders.

Crestview Mutual Water Company
Board of Directors
Regular Board Meeting

THURSDAY, JULY 22, 2021

4:00 P.M.

328 Valley Vista – Corporate Office

Zoom: Please Contact the Office and Staff Will Send Link

AGENDA

1. **SHAREHOLDERS PUBLIC FORUM**
 - Shareholders that wish to present questions to the Board are invited to provide their written questions to Staff at least 48-hours prior to the meeting being called-to-order for Board consideration
 - Shareholders may address the Board about any matter within the jurisdiction of the Board and not on the Agenda
2. **MINUTES**
 - Board Meeting Open Session June 24, 2021
 - Executive Closed Session June 24, 2021
3. **REVIEW AND PRESENTATION OF TECHNICAL REPORTS – WELL #7**
 - Receive Comments and Questions from Shareholders about Technical, Financial, and Design Reports for Well #7
4. **RESOLUTION 2021 -- 01 -- BOARD OF DIRECTORS OF CRESTVIEW MUTUAL WATER COMPANY TO REIMBURSE QUALIFYING PROPERTY OWNERS FOR QUALIFYING COSTS AND EXPENSES**
5. **GENERAL MANAGERS REPORT**
 - Monthly Operations Report
 - Well #7 Project Update
 - Well #8 Project Update
6. **MONTHLY FINANCIAL REVIEW**
 - Monthly Financial Reports – Unaudited
 - Annual \$250,000 Line of Credit Renewal -- Approval to Renew Effective July, 2021
7. **EXECUTIVE SESSION (CLOSED)**
 - Existing Litigation – Adjudication Las Posas Basin, Case #VENI00509700
 - Potential Litigation – Significant Exposure – I Case - Plans for VC Board of Supervisors Appeal and Contingencies
 - Report from Legal Ad Hoc Committee
8. **ADJOURNMENT**

Lack of Communication and Dishonesty (Cont.)

- Affected shareholders have not been given a list of names, addresses and location of septic systems to engage **ALL** neighbors adversely affected by the 600 ft. setback requirement.
- The push poll survey presented a highly distorted picture of the Well #7 project. It did not mention Planning Commission's denial of the modification to the CUP application, the costly impact of the well on the surrounding homeowners within 600 ft. and falsely stated there are not feasible alternatives to buying Calleguas water.
- There has been a total lack of due diligence with the purchasing of the lot on 191 Alviso without proper investigation of nearby septic systems, without regards to the rules of the HOA, and no alternative site investigation before the purchase of this property.

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Lack of Communication	Slides 28 - 29

Kessler, John

From: Tom ROZANSKI [REDACTED]
Sent: Sunday, September 12, 2021 5:40 PM
To: Parks, Linda; Ramirez, Carmen; LaVere, Matt; Long, Kelly; Supervisor Huber; ClerkoftheBoard
Cc: Ward, Dave; Fogg, Mindy; Kessler, John
Subject: Fwd: Mismanagement By Crestview Water

Dear Supervisors Parks, Ramirez, LaVere, Long, and Huber,

I have just read Robert Eranio's letter to you dated September 10, 2021. I now feel that it is important for me to forward the email below, which I sent to Supervisor Long last week.

The email below contains a copy of the letter from Crestview Water to all of its customers, inciting them to become vocal and rally to defeat those in opposition to their misguided purchase of 191 Alviso Dr., Camarillo, in pursuit of drilling for water. They don't mention 191 Alviso Dr. in their letter. They basically say — if you want water, email Supervisor Long. Do we want water? An easy choice, right? The issue isn't having water, it's 191 Alviso Dr..

I have previously stated that I have sincere concerns regarding Crestview Water's leadership, its mismanagement, and its truth and veracity, on so many issues. Another example is how Mr. Eranio states that 95% of the homeowners who do not live inside the HOA support the project and 85% of those who do live inside the HOA support the project. How is this possible when Crestview Water's own website states that there were only 19.48% respondents to their survey, which I and most of our HOA Board never even saw? By their own figures they only had 17 HOA owners, out of our 82 HOA owners, who supported the project.

Also, for some reason Mr. Eranio keeps forgetting that our HOA Architectural Committee met with him on July 26, 2021 to discuss his new plans for 191 Alviso Dr. (the plans were denied for numerous reasons). We also invited him to speak before our HOA at our next scheduled meeting and explained to him, on July 30, 2021, how he could call for a 'Special,' unscheduled, HOA meeting, inviting our entire HOA. Mr. Eranio never submitted a request for any 'Special' meeting.

As I mention in my email below, the Crestview Water leadership has mismanaged its purchase of 191 Alviso Dr. and is now continuing its mismanagement by wasting years of shareholder funds in attempting to force a round peg into a square hole at the inappropriate 191 Alviso Dr. site. Your Planning Commissioners were very knowledgeable and prepared when they analyzed Crestview Water's 191 Alviso Dr. pursuit on June 25, 2020. I know, I was there for the entire day and witnessed it. They were definitive and unanimous in their denial.

Thank you for your time and understanding regarding this matter.

Sincerely,

Tom Rozanski
President, Las Posas Hills Owners Association

Begin forwarded message:

From: Tom ROZANSKI [REDACTED]
Subject: Mismanagement By Crestview Water
Date: September 10, 2021 at 7:46:50 AM PDT

To: kelly.long@ventura.org

Dear Kelly, I reside at 130 Alviso Dr., Camarillo and am a customer of Crestview Water. Attached is a copy of a Crestview Mutual Water Company letter mailed to all 600 of its customers. It is signed by its Board President, Sol Chooljian.

The letter states that unless you and the Board of Supervisors approve Crestview Water's 'mysterious' Well Number 7 permit — no location identified — that they may not have any water available to protect us in the event of a fire.

This has been an all too usual fear mongering scare tactic used by Crestview Water for the last 3 to 4 years regarding their mismanagement in purchasing 191 Alviso Dr., Camarillo, for the purpose of constructing and operating a makeshift water well, titled Well #7. 191 Alviso Dr. is situated where all of the smallest lot sizes in Las Posas Hills are located. Those lot sizes are about half the size of the average, one acre, lot sizes within all of Las Posas Hills. It cannot effectively have a deep water well constructed and operated for number of reason identified in the Ventura County Planning Commissioners analysis of June 25, 2020.

By the way, I attended that all day June 25th meeting and was VERY impressed by the Planning Commissioners knowledge and preparation for that meeting. At least one of the Commissioners actually visited the 191 Alviso Dr. location so that she could see for herself how close the neighbors were to the proposed well, how steep the lot's drop-off is, as well as where the heritage trees, and the Blue Line Stream are. At the end of the day the Planning Commissioners were very definitive, and unanimous, in denying Crestview Waters application.

For the last 3 to 4 years, two of Crestview Water's long-time Board Members, Norman Fahnoe and Steve Gill, served as President of the Crestview Water Board of Directors. Both signed similar erroneous and fear mongering letters on behalf of Crestview Water regarding Well #7 and the 191 Alviso Dr. site. Both have now resigned from the Crestview Water Board of Directors.

The Crestview Water leadership has mismanaged its purchase of 191 Alviso Dr.. They also are continuing their mismanagement by wasting shareholder funds by trying to force a round peg into a square hole at the inappropriate 191 Alviso Dr. site.

I urge you to study the actual analysis regarding constructing and operating a water well at the 191 Alviso Dr. location, not the Crestview Water pipe-dream analysis. Crestview Water does not have a good record when it comes to determining, constructing, and operating water wells (i.e. Well #5).

Sincerely, Tom Rozanski

CE

Dear Crestview Sha

Let me keep this di

From: [Susan Burgos](#)
To: [REDACTED] [Parks, Linda](#); [Ramirez, Carmen](#); [LaVere, Matt](#); [Long, Kelly](#); [Supervisor Huber](#); [Clerkoftheboard](#)
Cc: [Ward, Dave](#); [Fogg, Mindy](#); [Kessler, John](#)
Subject: Re: Mismanagement By Crestview Water
Date: Monday, September 13, 2021 1:25:34 AM

Oh, what a tangled web "we" weave . . . Thanks for your coverage of this fiasco, Tom. By the way, there is something missing on the design of the "house" at 191 - a Taco Bell! Susan

-----Original Message-----

From: Tom ROZANSKI [REDACTED]
To: Parks, Linda <Linda.Parks@ventura.org>; Ramirez, Carmen <Carmen.Ramirez@ventura.org>; LaVere, Matt <Matt.LaVere@ventura.org>; Long, Kelly <Kelly.Long@ventura.org>; Huber, Robert <Supervisor.Huber@ventura.org>; Clerkoftheboard@ventura.org
Cc: Dave.Ward@ventura.org; Fogg, Mindy <Mindy.Fogg@ventura.org; John.Kessler@ventura.org
Sent: Sun, Sep 12, 2021 5:39 pm
Subject: Fwd: Mismanagement By Crestview Water

Dear Supervisors Parks, Ramirez, LaVere, Long, and Huber,

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To: kelly.long@ventura.org

Dear Kelly, I reside at 130 Alviso Dr., Camarillo and am a customer of Crestview Water. Attached is a copy of a Crestview Mutual Water Company letter mailed to all 600 of its customers. It is signed by its Board President, Sol Chooljian.

The letter states that unless you and the Board of Supervisors approve Crestview Water's 'mysterious' Well Number 7 permit — no location identified — that they may not have any water available to protect us in the event of a fire.

This has been an all too usual fear mongering scare tactic used by Crestview Water for the last 3 to 4 years regarding their mismanagement in purchasing 191 Alviso Dr., Camarillo, for the purpose of constructing and operating a makeshift water well, titled Well #7. 191 Alviso Dr. is situated where all of the smallest lot sizes in Las Posas Hills are located. Those lot sizes are about half the size of the average, one acre, lot sizes within all of Las Posas Hills. It cannot effectively have a deep water well constructed and operated for number of reason identified in the Ventura County Planning Commissioners analysis of June 25, 2020.

By the way, I attended that all day June 25th meeting and was VERY impressed by the Planning Commissioners knowledge and preparation for that meeting. At least one of the Commissioners actually visited the 191 Alviso Dr. location so that she could see for herself how close the neighbors were to the proposed well, how steep the lot's drop-off is, as well as where the heritage trees, and the Blue Line Stream are. At the end of the day the Planning Commissioners were very definitive, and unanimous, in denying Crestview Waters application.

For the last 3 to 4 years, two of Crestview Water's long-time Board Members, Norman Fahnoe and Steve Gill, served as President of the Crestview Water Board of Directors. Both signed similar erroneous and fear mongering letters on behalf of Crestview Water regarding Well #7 and the 191 Alviso Dr. site. Both have now resigned from the Crestview Water Board of Directors.

The Crestview Water leadership has mismanaged its purchase of 191 Alviso Dr.. They also are continuing their mismanagement by wasting shareholder funds by trying to force a round peg into a square hole at the inappropriate 191 Alviso Dr. site.

I urge you to study the actual analysis regarding constructing and operating a water well at the 191 Alviso Dr. location, not the Crestview Water pipe-dream analysis. Crestview Water does not have a good record when it comes to determining, constructing, and operating water wells (i.e. Well #5).

Sincerely, Tom Rozanski

