

WRCB = California State Water Resources Control Board. BMWCo Primaty Contact: Leticia ("Lettie") Padilla, Water Resources Control Engineer : Leticia.Padilla@Waterboards.ca.gov, 1 (619) 525-4493; San Diego supervisor Joseph Guzman (Contacts: 619-525-4772; joseph.guzman@waterboards.ca.gov)

Bailey Mutual State Permit Application Status - August 5, 2026

Prepared by Laurie Gerber, Secretary, Bailey Mutual Water Company

Green - submitted and accepted

Blue - Actively working on it

Item	Project	Primary reason for project	Category (Admin, Ops Major, Ops Minor)	Permit needed?	Operator needed?	Project Lead	Original submission date	Accepted date	Notes on submission
1	State Water Permit application	Requirements fm Cal State WRCB 9/27/24	Admin			Laurie	8/18/25		Submitted application as Transient Non-Community (as requested by Joseph Guzman in 2024)
2	Well completion Report	Part of State permit application	Admin			Laurie	8/18/25	9/24/25	<i>Lettie: Do we have documentation that the old wells were destroyed?</i> Well #2 yes, included in 8/18 submission. Destruction of Well #2 happened same time as Well #3 was drilled in 2002. Well #1 - No destruction info in Brad's binder. <i>Lettie accepted 9/24</i>
3	Well location, design, and construction info	Part of State permit application	Admin			Laurie	8/18/25	8/20/25	Accepted as submitted. (Documentation from Brad's operations binder.)
4	Drinking Water Source Assessment and protection report (DWSAP)	Part of State permit application	Admin			Laurie	6/18/26		Stephanie Torres of Moonshot Missions offered to review preliminary completed forms. Forwarded to her 4/21/26. Modified submission based on Stephanie's suggestions. 7/27/26 Resubmitted with revised Well Datasheet (including Actual, Estimated, and Default).
5	System info datasheets. Well, Storage, and	Part of State permit application	Admin			Laurie	8/18/2025 12/11/25 7/27/26		8/18/25 submission rejected. Lettie provided new data sheet forms received Sept 24, 2025. Resubmitted December 11, 2025. June 2026, Lettie noted that the far right column of well datasheet is not completed (Actual Estimated or Default). Additional information requested June 18, 2026.
6	Source Monitoring for regulated contaminants	Part of State permit application	Admin			Laurie	2/2/26		<i>Guidance from Lettie 9/18/25 - what we need to monitor:</i> <i>One time - (inorganic chemicals)= Fluoride, iron, manganese (General Mineral)= total hardness (as CaCO3), bicarbonate alkalinity, carbonate alkalinity, hydroxide alkalinity, calcium, magnesium, sodium (General Physical)= Specific Conductance, PH (laboratory)</i> <i>Annually- (inorganic chemicals) Nitrate (as NO3) . Tri-annually- (inorganic chemicals) Nitrite (as N)</i> <i>Tested in September 2025. Lab results: ND - None Detected of either Nitrate or Nitrite. November: Found that test should be done at well, not at regular sample site.</i> Samples taken at well January 4, 2026 for delivery to lab January 5th. Results show no unusual contaminants. Results posted on website.
7	Water Quality Emergency Notification Plan	Part of State permit application	Admin			Laurie	8/18/25	9/18/25	<i>Report accepted by county in 2024 was resubmitted to the state 10/21/24 is no longer valid. Lettie provided the new forms on 8/20/25 w/new reqts for water hauler and well svcs contact. Accepted 9/18/25.</i>
8	Bacterial Sample Siting Plan	Part of State permit application	Admin			Laurie	8/18/2025 4/2/26 1/29/26 4/2/26	4/22/26	Submitted the BSSP that was accepted by both county and state in 2024 and has been in use. <i>Lettie: Needs revision: Well is not an acceptable upstream sample site. Revise with suggested sample sites.</i> November-December 2025 - working with owners on new sample sites. Resubmitted January 29, 2026 with Soto and Lopez as new primary sites for Old Center and New Center lines. Need updated map still. Resubmitted 4/2/26 with Reed as primary sample site for old center line. Cal Rurals rep Abel Silva strongly advised not to use Soto: only a few inches above ground level with old spigot facing upward. Changed to Reed on Fern Trail
9	Cross Connection Control Plan	Part of State permit application	Admin/Ops			Jack			9/29/25 Have example Board resolution from Krista Mutual Water company. Need to copy and customize it to BMWCO. (Met at CalMutuals workshop Long Beach.) 10/22/25 Jack: Can we have a year to develop a CCCP as an existing system? Lettie: Bailey would need to conduct their hazard assessment before the Division can issue a permit. That includes a completed CCC plan. December 5, 2025 - Andrew and Luis from County Backflow did hazard assessment. Can form basis for our plan. Need to assign a new Cross Connection Control Coordinator role within BMWCo to develop our Cross Connection Control Plan, report regularly to the state, and monitor for potential Cross Connections into the future. Jack cannot continue.

10	CEQA/NEPA Documentation Water Supply Environmental Intake	Part of State permit application	Admin			Laurie			Stephanie Torres of Moonshot Missions offered to review preliminary completed forms. Forwarded to her 4/21/26 Stephanie provided a completed draft CEQA in late June/early July 2026. Not yet reviewed/submitted.
11	TMF (Technical, Managerial and Financial Assessment)	Part of State permit application	Admin			Laurie			Missing items include chain of comand/organizational structure; Training program; Operations plan; Policy and procedures; Budget projections and budget control program. August 2026: Julie prepared draft Emergency Response plan.
11.a	Capital Improvement Plan (required component of TMF Assessment)	Budget for, prioritize, plan and schedule system upgrades,	Admin/Ops			Laurie			Draft accepted by Board July 2025. Needs much more rigorous thinking about real costs (not guesses that are there now) sequence and timing, and addition of required meters.
12	Permitted Plans to remedy 4 items cited by State.	Also mentioned on Operations Projects Worksheet	<i>I understand that state can issue a state water permit with approved plans for these projects even if they are not completed. No fee to seek permit directly with our SWRCB contacts. Review and feedback process averages 2 weeks. Permits from SWRCB are ONLY for Drinking water compliance. They do not imply approval from county planning office/They are not building permits.</i>						
12.a	Replace 10K gallon transfer tank	State and County citation	Admin/Ops	Yes					11/2024 Joseph Guzman (SWRCB) provided an example of an approved tank replacement proposal. (Available by email forward). Guzman and Brighton (So Cal Well Svcs Sept 9, 2025) suggested bypassing the transfer tank. Pump from well directly to the steel tank. November 2025, got additional quote and advice from McDannald Pump. Proposed reconfigurations eliminate weep hole ("pisser") which drains pipes after pumping. Need to make sure all pipe on the uplink is protected from freezing. May involve re-trenching parts of the line. Need to submit a plan for reconfiguration to SWRCB.
12.b	Replace 8K gallon storage tank	State and County citation	Admin/Ops	Yes					Include engineer-stamped plan for tank replacement in work to be accomplished with USDA Pre-Planning grant, if awarded.
12.c	Replace/redesign overflow on 25K gallon steel tank	State and County citation	Admin/Ops	Yes					12/5/25 Luis and Andrew from County Backflow suggested double check valve at tank connection. Will block water from re-entering the tank. Engineer Sean Bush ecommends interior dry pipe overflow. Either solution will require draining the tank. Can we do this after we replace the 8,000 gallon tank, so we can use the new storage tank while we drain and clean the steel tank and replace the overflow? In the meantime, the state has approved our proposed plan to regularly flush the overflow line during quarterly disinfectitons.
12.d	Remedy cross connection to Bailey's resort - Establish a cross connection control plan	State and County citation	Admin/Ops	Yes					