



959 South Coast Drive
Suite 315
Costa Mesa
California 92626
Office 714.352.7750
Fax 714.352.7765
www.percwater.com

February 5, 2015

San Diego Regional Water Quality Control Board
Attn: Ms. Michelle Mata
2375 Northside Drive, Suite 100
San Diego, CA 92108

Re: Triennial Basin Plan Review Comments

Honorable Members of the Regional Water Quality Control Board:

On behalf of Sudberry Properties, developer of the Civita planned community in the Mission Valley area of the City of San Diego, PERC Water is submitting the comments below in connection with your Board's current triennial review of the Water Quality Control Plan for the San Diego Basin (the "Basin Plan"). Pursuant to our understanding, we request that these comments also be incorporated into your current consideration of a Basin Plan amendment relating to on-site wastewater treatment systems.

We request that you consider eliminating a provision of the current Basin Plan which presents a significant obstacle to the development of privately owned and operated wastewater treatment and recycling systems. The Civita project is planning to construct a facility of this kind. The current prohibitory provision is found at page 4-26 of the Basin Plan, in the portion of Chapter 4 addressing Guidelines for New Community and Individual Sewerage Facilities. Specifically, we are concerned about the passage, which reads:

"Community Sewerage Systems

The Regional Board will regulate all discharges of wastes from community sewerage systems. The Regional Board will require a RWD to be filed for all proposed waste discharges, which involve the use of new community sewerage systems. Before the Board will consider the RWD to be complete, the following requirements must be met:

- A public entity must assume legal authority and responsibility for the ownership, operation and maintenance of the proposed wastewater treatment and disposal system. The RWD must be submitted by the public entity. [Emphasis added.]
..."

The Board may be aware that, since the adoption of the above-referenced provision, interest has grown significantly in this region in wastewater recycling generally, and more recently in private development, ownership, and operation of such facilities. The City of San Diego, the largest jurisdiction in the region, has committed through its Pure Water program to the development of facilities which eventually will treat for reuse 84 million gallons of wastewater per day. Numerous other municipal jurisdictions and water agencies in the region are pursuing similar programs. At the same time, the City

of San Diego is in the midst of developing a permitting system for privately owned and operated wastewater treatment facilities.

The Board has recognized for many years that reclamation of wastewater is a highly preferable alternative to ocean disposal. In 2013, the Board, in adopting the *Practical Vision: Healthy Waters Healthy People*, highlighted the importance of wastewater recycling, as an important element in meeting the water needs of this region. Similarly, the Recycled Water Policy adopted by the State Water Resources Control Board in that same year sets very ambitious goals for increasing the use of recycled water. The policies and goals are far more likely to be met if the obstacles to private ownership and operation of wastewater reclamation facilities are alleviated and modernized.

The City has expressed clearly that it does not wish to be the party responsible for ownership and operation of wastewater treatment facilities, such as the water reclamation facility that is being developed in the Civita community. PERC Water Corporation is a water infrastructure development firm specializing in developing water reclamation facilities. Our firm designs, permits, constructs, operates, and manages water reclamation facilities throughout California and the United States. We have designed over 60 similar water infrastructure projects over the past 16 years, 22 of which we have been constructed and placed into operation.

The Civita project is only the first major development within the city limits of San Diego for which this is an important issue. Water supply concerns are motivating many other developers to become interested in constructing such facilities. Golf courses and homeowners associations, in both new and existing developments, are showing similar interest in developing wastewater recycling facilities to produce a sustainable source of drought tolerant water supply for on-site irrigation and reuse. You will continue to hear more in this regard from firms like ours and other interested parties.

Thank you for your consideration.

Regards,



Steven D. Owen
Vice President, Infrastructure Development
PERC Water Corporation

Cc: Mark Radelow, Sudberry Properties
Cary Lowe, Ph.D., AICP