



December 18, 2012

Mr. David Gibson, Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Subject: Comments on Revised Tentative Addendum No. 1 to Order No. 2000-10, An Addendum Modifying Master Recycled Water Permit for the Production and Purveyance of Recycled Water for San Elijo Joint Powers Authority, San Dieguito Water District, Santa Fe Irrigation District, and City of Del Mar, San Diego County (255265:oosibodu)

Dear Mr. Gibson:

The mission of WaterReuse California is to promote the responsible stewardship of California's water resources by maximizing the safe, practical and beneficial use of recycled water. Our members are responsible for about 90 percent of the water recycled in California. I believe that San Diego Regional Water Quality Control Board embraces and supports similar views on recycled water.

The purpose of this letter is to comment on the requirement in the Revised Tentative Addendum No. 1 to Order No. 2000-10 (Tentative Order) that San Elijo Joint Powers Authority (SEJPA) submit a schedule for developing a salt and nutrient management plan (SNMP) for the San Elijo groundwater basin. This requirement appears unnecessary and inconsistent with Recycled Water Policy based on the following facts:

- With adoption of Resolution No. R9-2010-0125, *A Resolution Endorsing The Proposed Guidelines For Salinity and Nutrient Management Planning in the San Diego Region*, by the Regional Water Board, the Regional Water Board established that groundwater in the basin supplied with SEJPA's recycled water (the San Elijo groundwater basin) is a Tier D-2 basin, which is a "[m]oderate to small-sized coastal or inland groundwater basin within the MWDSC service area with higher salinity groundwater quality and existing Basin Plan groundwater quality objectives for TDS that exceed 1200 mg/l. Recycled water compliance with existing Basin Plan TDS objectives is not a problem within these basins." Resolution No. R9-2010-0125 also established the Regional Water Board's concurrence with the notion that SNMPs "are not required within the Tier D basins" (see page 3-18 of *Guidelines*) since SNMPs in such basins would not provide any benefit to protection of beneficial uses.
- State Water Resources Control Board (SWRCB) acknowledges that a full-scale

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Comments on Revised Tentative Addendum No. 1 to Order No. 2000-10
December 18, 2012
Page 2

SNMP is not appropriate or necessary in all basins and that an alternative compliance approach is appropriate in some cases. For example, full-scale SNMPs are not required in numerous basins in the jurisdiction of the North Coast Regional Water Quality Control Board, and such basins will instead be monitored to verify salt and nutrient conditions are stable and further measures are unnecessary. I encourage your staff to communicate with Mr. Jon Bishop at SWRCB on this matter.

- Addition of Advanced Water Treatment by SEJPA to the existing recycled water system as permitted by Tentative Addendum #1 will reduce the salt load on the service area and the hydrologic areas that have already been receiving recycled water for 12 years.

Based on these facts, we recommend the following:

1. Remove the requirement for submittal of a schedule to develop an SNMP from the Tentative Order; or
2. Revise the Tentative Order to acknowledge that a full-scale SNMP is not needed.

Sincerely,



David W. Smith, PhD
Managing Director

cc: Julie Chan, Chief Cleanup and Land Discharge Branch, RWQCB
Jon Bishop, Chief Deputy Director, SWRCB
Michael T. Thornton, General Manager, SEJPA