California Regional Water Quality Control Board

San Diego Region

Response to Public Comments

2018 Basin Plan Triennial Review

September 10, 2018

CALIFORNIA
Water Boards
STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

STATE OF CALIFORNIA
EDMUND G. BROWN, JR., Governor
MATTHEW RODRIQUEZ, Agency Secretary, California Environmental Protection Agency

California Regional Water Quality Control Board,
San Diego Region
Tomás Morales, *Chair*
Henry Abarbanel, *Vice Chair*
Gary Strawn
Eric Anderson
Stefanie Warren
Betty Olson

David W. Gibson, *Executive Officer*
James G. Smith, *Assistant Executive Officer*

This report was prepared
by
Jody Ebsen, *Engineering Geologist*

under the direction of
Cynthia Gorham, *Senior Environmental Scientist*
Jeremy Haas*, Environmental Program Manager*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION
2375 Northside Drive, Suite 100
San Diego, California 92108

Telephone: (619) 516-1990
http://www.waterboards.ca.gov/sandiego/

TABLE OF CONTENTS

1.0 INTRODUCTION

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) began the 2018 Basin Plan Triennial Review on March 26, 2018, by requesting comments on elements in the Water Quality Control Plan for the San Diego Basin (Basin Plan) that may need revision. The Basin Plan identifies beneficial uses of surface water and groundwater, establishes water quality objectives to protect beneficial uses, sets antidegradation requirements, and describes implementation policies to achieve water quality objectives; collectively, these are known as water quality standards. State and federal laws require periodic review and update of the Basin Plan and the Water Board's review is sometimes referred to as the "triennial" review because federal law requires a review of water quality standards every three years.

The purpose of the review is to identify and prioritize possible revisions to water quality standards and other aspects of the Basin Plan. The product of the review is a list of priority projects to be investigated further and, where appropriate, addressed through the adoption of Basin Plan amendments. The San Diego Water Board has prepared a draft prioritized list of proposed Basin Plan projects for consideration in the 2018 Basin Plan Triennial Review.

The public was provided a 45-day comment period beginning on June 22, 2018 and ending on August 6, 2018, to provide comments on the draft prioritized list. The San Diego Water Board has prepared written responses to comments received within this time frame. A Public Hearing Notice was issued on August 24, 2018, 47 days in advance of the Board Hearing. The San Diego Water Board will consider the comments and make appropriate updates to the draft prioritized list. The draft prioritized list will be presented to the San Diego Water Board for adoption during a public hearing on October 10, 2018. Documents relevant to the hearing will be available at least 30 days prior to the hearing.

1.1 Proposed Projects

The draft prioritized list includes the projects shown in Table 1 below.

Table 1. Projects from the Draft Prioritized List

No.	Project Name
1	Tijuana River Valley Water Quality Restoration
2	Biological Objectives for Water Bodies in the San Diego Region
3	Contact Water Recreation (REC-1) Water Quality Objectives
4	Climate Change Readiness: Sustainable Local Water Supply
5	Clean Water Act Section 304(a) Criteria Recommendations
6	Editorial Revisions, Minor Clarifications or Corrections

The draft staff report and full descriptions of the proposed projects can be found on the San Diego Water Board's Basin Plan Review website.

2.0 PUBLIC COMMENTS AND RESPONSES

The San Diego Water Board received eight comment letters from the public during the comment period from June 22, 2018 to August 6, 2018. The commenters are listed in alphabetical order in Table 2 below.

Table 2. List of Commenters.

No.	Commenter
1	City of San Diego
2	Clean Water Now
3	County of San Diego
4	San Diego Coastkeeper
5	San Diego County Water Authority
6	San Juan Basin Authority
7	Santa Margarita Water District
8	South Orange County Water Authority

The comments and responses are organized by commenter as listed above. A summary of the comments is presented first, then excerpts from the comment letters are provided. The San Diego Water Board responses are labeled following the public's comment. Copies of the original comment letters are provided in Section 3 of this document.

2.1 City of San Diego

The first public comment letter is from the City of San Diego's Transportation & Storm Water Department (City).

Summary

The City supports the Contact Water Recreation (REC-1) Water Quality Objectives, Climate Change Readiness: Sustainable Local Water Supply – Beneficial Uses and Water Quality Objectives Related to Reservoirs, Tijuana River Valley Water Quality Restoration and Biological Objectives for Water Bodies in the San Diego Region. The City provided suggestions to update project descriptions.

Specific Comments

In general, the City is in support of the draft prioritized list of projects proposed by the Regional Water Quality Control Board (Water Board) and offer the following additional comments.

Prioritization of Triennial Review Projects
The City previously recommended assigning Tier 1 priority to the *Contact Water Recreations(REC-1)* and *Reservoir Beneficial Uses* projects. The City appreciates the assignment of Tier 1 priority to the REC-1 project and request that the Water Board reconsider including the *Reservoir Beneficial Uses* project in the prioritized list, based on the discussion below.

Contact Water Recreation (REC1) Water Quality Objectives
The City requests that the project description be updated to note short and long-term regulatory updates that are currently being considered to address important technical and policy issues critical to supporting REC-1 and to facilitate effective implementation efforts. Recommended actions include short-term NPDES permit updates to provide a compliance pathway, technical studies, as well as future updates to the Basin Plan. Consistent with the City's previous comments and discussions with Water Board staff, the key REC-1 issues include the following:

1. Updates to REC-1 Water Quality Objectives and Implementation Provisions to focus on reducing human health risk
2. Incorporate recent scientific advancements, including the use of human marker testing (e.g., HF183) to increase confidence in assessing risk and permit compliance
3. Move compliance points to target recreational beach areas to focus on areas with the greatest risk to human health
4. Update compliance schedules to incorporate the results of the proposed forthcoming studies and investigations, and streamline implementation efforts to focus on reducing human sources.

The City appreciates the San Diego Water Board's recognition of the importance of considering the latest science. Therefore, the City requests the Water Board members consider the important conclusions of these locally focused studies and related science, and include them in the 2018 Triennial Review amending the Basin Plan to accurately reflect this region's REC-1 beneficial use conditions.

Project 4: Climate Change Readiness: Sustainable Local Water Supply

In the City's May comment letter regarding the triennial review process, the City expressed support for the 'Beneficial Uses and Water Quality Objectives Related to Reservoirs' proposed item, and urged Tier 1 prioritization for the initiative. The Draft Staff Report and Prioritized List released on June 22, 2018 did not include a separate initiative on reservoir-related issues. The City understands that the Regional Board has limited staff resources to address the many important issues facing the watersheds within its jurisdiction.

The City agrees with the fundamental premise underlying the Regional Board's inclusion of this initiative in Project 4-that expanding water recycling is a critical component of climate change readiness. The City provides drinking water to over 1.6 million San Diegans, and treats wastewater from the City of San Diego and 15 other cities and districts from a 450 square mile area with a population of over 2.2 million. An average of 180 million gallons of wastewater is treated by the City every day of the year. The City of San Diego is an industry-recognized leader in water reuse [aka recycled water]. Our two existing reclamation plants at North City and South Bay produce tertiary-treated 'purple pipe' water. This important source of supply helps to meet our region's water needs in a sustainable and cost-effective manner, using local production capacity to offset the need for expensive, imported potable water for certain industrial and agricultural applications.

Beyond simple 'purple pipe' water recycling, the City is under way with Pure Water San Diego, a landmark potable reuse initiative that, when fully implemented in 2035, will supply one-third of San Diego's water from highly-treated recycled water. Pure Water San Diego will provide a drought-proof, locally-controlled, reliable, and cost-effective water supply. It will be the first potable reuse project in California to utilize surface water augmentation, with the first phase of the project, set to come online in just three short years (2021), augmenting Miramar Reservoir.

Specifically, Project 4 includes the potential to address basin plan issues related to water reuse, providing an opportunity to assess beneficial uses and water quality objectives and possibly adopt changes that can help support the implementation, expansion, and efficient operation of water reuse projects in the San Diego area.

Tijuana River Valley Water Quality Restoration

As discussed in the City's May 18, 2018 comment letter, the City is supportive of efforts to advance restoration and solutions to water quality, sediment and trash issues in the Tijuana River Valley. The City recommends that language be added to clarify that the development of the TMDL would acknowledge the cross border component and primary role and responsibility of the federal government in addressing this international problem. Although the City supports the inclusion of this project in the Triennial Review, the City should not be named in any future TMDLs developed for the Tijuana River Valley.

Biological Objectives for Water Bodies in the San Diego Region

The City supports efforts to develop Biological Objectives in order to improve aquatic life beneficial use assessments and prioritize implementation efforts. The City supports inclusion of this project in the Triennial Review.

The City has been an active partner in developing Biological Objectives at the state and regional level, including funding special studies to better understand reference conditions and modified streams in the region, and ongoing efforts to develop causal assessment methods to identify the likely causes of impairment. The City recommends updating the project description to note the development of Biological Objectives will need to consider incorporation of appropriate biological expectations for different stream types (e.g., modified streams). Also, the need to develop a true weight of evidence approach should be referenced to encourage the best use of available data for assessments and to prioritize restoration and protection efforts.

San Diego Water Board Response

The San Diego Water Board appreciates the support of the City on priority projects 1 through 4. These four projects will require the bulk of staff time over the next three years. In past triennial reviews the projects were divided into Tier 1 and Tier 2 projects. Tier 1 projects represented the priority issues that would use the anticipated resource allocations over a three-year period. Tier 2 projects were issues that could be considered for project development if resources and readiness allowed. In past years, we have not been able to attend to projects on the Tier 2 list. For this triennial review only one list was developed for consideration, which included one project (project 4) that will require additional resources to fund staff time beyond those currently provided to the Water Board for the next three-years to address it. Placing an issue on the priority list prompts San Diego Water Board staff to investigate the need and appropriateness for a Basin Plan amendment to meet project goals, it is not a guarantee that a Basin Plan amendment will be made.

The suggestions for updates are noted. The descriptions used in the prioritized list are intended to provide a broad project scope. The project description for the Contact Water Recreation (REC-1) Water Quality Objectives was changed to include updating the bacteria standards in the Basin Plan with the latest standards adopted by the State Water Resources Control Board on August 7, 2018, that are consistent with USEPA's 2012 Recommended Recreational Water Criteria for Bacteria. The description also includes other recommendations from the *2014 Triennial Review Project Summary Evaluation of Contact Water Recreation (REC-1) Water Quality Objectives and Methods for Quantifying Exceedances*.

The descriptions of each project are not intended to limit or narrowly define any of the projects. The specific details of each project will be identified and considered as part of the project development, which is separate from developing a prioritized list for the triennial review. Therefore, the Tijuana River Valley Water Quality Restoration project description was not updated with suggested changes. The project description for Biological Objectives already indicates that the second phase of the project will be to identify appropriate metrics to measure the integrity of highly intermittent and ephemeral streams, therefore additional changes were not made to the description. The detailed suggestions for each of the projects will be taken under advisement during the respective project development.

2.2 Clean Water Now

The next public comment letter is from Clean Water Now.

Summary

Clean Water Now supports the Climate Change Readiness: Sustainable Local Water Supply project, and comments submitted regarding this project by South Orange County Wastewater Authority, San Juan Basin Authority and Santa Margarita Water District. Specifically, they support the proposal to evaluate and possibly revise water quality objectives for Total Dissolved Solids in groundwater basins identified for continuing and expanding recycled water uses.

Clean Water Now has a concern that project development is done in an open, transparent manner, and that non-government organizations are provided an opportunity to participate.

Specific Comments

> We have reviewed the submissions provided to us by the South Orange County Wastewater Authority (SOCWA), San Juan Basin Authority (SJBA) and Santa Margarita Water District (SMWD). CWN enthusiastically supports all of their comments.
>
> …CWN firmly requests that SOCWA members acknowledge and pursue the need to proactively include protectionist NGOs in the proposed follow-up…

San Diego Water Board Response

Thank you for your support of the Climate Change Readiness: Sustainable Local Water Supply project. The process for developing Basin Plan amendments has robust public participation requirements. There will be many opportunities to allow interested parties to participate in the development of the project.

2.3 County of San Diego

The next public comment letter is from County of San Diego's Department of Public Works (County).

Summary

The County supports the Contact Water Recreation (REC-1) Water Quality Objectives, and the Tijuana River Valley Water Quality Restorations projects.

Specific Comments

Contact Water Recreation (REC-1) Water Quality Objectives

The County fully supports the inclusion of the project Contact Water Recreation (REC-1) Water Quality "Bacteria TMDL" as a top priority (Tier 1) for the 2018 Triennial Review. The County has been actively collaborating with Regional Water Board staff on the 2014 Triennial Review project related to the same topic and supports action to incorporate into the Bacteria TMDL, the new science and information acquired through several locally funded studies, such as the Surfer Health Study and Cost-Benefit Analysis. We also support inclusion of the USEPA 2012 Recreational Criteria as an update to the REC-1 water quality objectives. Evaluating bacteria standards and corresponding TMDL changes are a top priority for the County of San Diego.

The County strongly encourages the Regional Water Board's support of the timely completion of these projects. Because the deadlines for compliance with the TMDLs are rapidly approaching, it is critical to incorporate the latest scientific information into the TMDL now, rather than waiting until after the Investigative Order for San Diego River. The County will continue to support this project in any way possible to facilitate the evaluation of bacteria standards and TMDL changes. The County proposed specific changes to the Bacteria TMDLs as part of the Report of Waste Discharge submitted in December 2017. We look forward to reviewing Regional Water Board staff's recommended changes to the TMDL, as well as subsequent Water Board workshops and hearings on this topic.

Tijuana River Valley Water Quality Restoration

The County supports the 2018 Triennial Review Project "Tijuana River Waters Valley Water Quality Restoration" if the focus of the proposed project is to address the water quality of transboundary flows into the Lower Tijuana River Valley. The County recommends that language be added to clarify that the development of the TMDL would acknowledge the cross-border component and role and responsibility of the federal government. Although we support this project, the County should not be assigned waste load reductions in any future TMDLs developed for the Tijuana River Valley.

San Diego Water Board Response

The San Diego Water Board appreciates the support of the County. In past triennial reviews the projects were divided into Tier 1 and Tier 2 projects. Tier 1 projects represented the priority issues that would use the anticipated resource allocations over a three-year period. Tier 2 projects were issues that could be considered for project development if resources and readiness allowed. For this triennial review only one list was developed for consideration, even those that will require additional resources outside of the anticipated allocations for the next three-years. Placing an issue on the priority list prompts San Diego Water Board staff to investigate the need and appropriateness for a Basin Plan amendment to meet project goals, it is not a guarantee that a Basin Plan amendment will be made.

The suggestions for updates are noted. The descriptions used in the prioritized list are intended to provide a broad project scope. The project description for the Contact Water Recreation (REC-1) Water Quality Objectives was changed to include updating the bacteria standards in the Basin Plan with the latest standards adopted by the State Water Resources Control Board on August 7, 2018, that are consistent with USEPA's 2012 Recommended Recreational Water Criteria for Bacteria. The description also includes other recommendations from the *2014 Triennial Review Project Summary Evaluation of Contact Water Recreation (REC-1) Water Quality Objectives and Methods for Quantifying Exceedances*.

The descriptions of each project are not intended to limit or narrowly define any of the projects. The specific details of each project will be identified and considered as part of the project development, which is separate from developing a prioritized list for the triennial review. Therefore, the Tijuana River Valley Water Quality Restoration project description was not updated. The detailed suggestions for each of the projects provided by the commenters will be taken under advisement during the respective project development.

2.4 San Diego Coastkeeper

The next public comment is from San Diego Coastkeeper (Coastkeeper).

Summary

Coastkeeper is concerned with ensuring the list is limited to only the projects that can be pursued with the San Diego Water Board's limited resources for Triennial Review projects. Therefore, the list should be limited to the projects that have the highest likelihood of improving water quality with the available resources. Coastkeeper supports the Tijuana River Valley Water Quality Restoration, and the Biological Objectives for Water Bodies in the San Diego Region projects.

Coastkeeper recommends removing Contact Water Recreation (REC-1) Water Quality Objectives and Climate Change Readiness: Sustainable Local Water Supply projects from the prioritized list.

Specific Comments

Project 1: Tijuana River Valley Water Quality Restoration Should be the Highest Priority Project and be Allocated the Bulk of the PYs Allocated to Basin Plan and Triennial Review Project

Coastkeeper agrees that the restoration of the Tijuana River Valley should be the highest priority project and requests that sufficient resources be directed to this Project to ensure successful completion. The San Diego Water Board is well aware of the need to address the public health risks and environmental damage that have resulted from the discharges of waste from Mexico. Significant political and regulatory momentum has been generated over the past year to address and resolve this issue, and Coastkeeper is pleased that the San Diego Water Board is committed to keep moving in the direction to restore this important waterbody so that the Public may enjoy Key Beneficial Uses of the Tijuana River Valley.

Project 2: Biological Objectives for Water Bodies in the San Diego Region is Properly Listed as the Second Priority and Sufficient Resources Should be Allocated to this Project to Ensure that the Public Hearing is Conducted Between July and December 2018

Coastkeeper again wishes to reiterate our strong support the inclusion of biological objectives (BOs) into the Triennial Review and as a Basin Plan amendment. BOs will provide the San Diego Water Board and Dischargers the tool to identify impaired water bodies, the causes of the impairment, and the most effective means to restore the water body.

Project 3: Contact Water Recreation (REC-1) Water Quality Objectives Should be Removed from the Draft List

Coastkeeper remains supportive of Regional Board action aimed at identifying sources of REC- 1 impairment, including human bacteria inputs, and addressing those sources through Investigative Orders, enforcement actions, and amendments to TMDLs to include wastewater agencies contributing to impairments through exfiltration. To the extent that this proposed project aims to accomplish that goal alone, we are supportive.

We do not, however, support region-wide or site-specific Basin Plan amendments to REC-1 objectives or amendments to how those water quality objectives are assessed. We respectfully request removal of review of REC-1 water quality objectives and/or implementation plans, as we do not believe there exists sufficient data to support such amendments. We also note the State Water Board is in the process of amending REC-1 standards statewide and we believe any local actions do to so would be duplicative, an inefficient use of local Regional Board staff resources, and unnecessary.

Project 4: Climate Change Readiness: Sustainable Local Water Supply Should be Removed from the Draft List

Due to the lack of sufficient resources this Project [Climate Change Readiness: Sustainable Local Water Supply] should be removed from the list. The San Diego Water Board acknowledges that available resources "are not expected to be sufficient to lead and complete this Project within the next three years" and suggests that resources from the South Orange County Water Authority (SOCWA) and the San Diego County Water Authority (SDCWA) could be used to engage in a collaborative approach to this Project. The Draft List does not state that such agreements have been made or forthcoming. This lack of resources and/or outside funding dictates that this Project should be removed from the Draft List.

San Diego Water Board Response

Thank you for your support of the Tijuana River Valley Water Quality Restoration, and Biological Objectives for Water Bodies in the San Diego Region projects and sharing your concerns with the Contact Water Recreation (REC-1) Water Quality Objectives, and the Climate Change Readiness: Sustainable Local Water Supply projects.

The staff recommendations[1] for moving forward with the REC-1 project contain both short and long-term actions. The short-term actions that will be considered for implementation in the next three years include modifying existing permits, conducting compliance audits, and identifying pathogen sources. The State Water Resources Control Board adopted statewide bacteria water quality objectives[2] on August 7, 2018, consistent with USEPA's 2012 Recommended Recreational Water Criteria for Bacteria. A Basin Plan amendment to update the bacteria water quality objectives in the San Diego Water Board's Basin Plan is necessary to align it with the most current standards.

For this triennial review one list was developed for consideration that includes projects that will require additional resources outside of the anticipated allocations for the next three-years. Placing an issue on the priority list prompts San Diego Water Board staff to investigate the need and appropriateness for a Basin Plan amendment to meet project goals, it is not a guarantee that a Basin Plan amendment will be made. The prioritized list is a multi-year plan and it is important to identify priority projects that could be pursued should unexpected opportunities arise in future years.

The San Diego Water Board is working with the South Orange County Water Authority, San Diego County Water Authority, and affected member agencies in collaboration to develop additional resources to pursue the projects that support climate change goals and drought preparedness.

[1] For a complete discussion on the REC-1 recommendations see *2014 Triennial Review Project Summary, Evaluation of Contact Water Recreation (REC-1)Water Quality Objectives and Methods for Quantifying Exceedances.*
[2] Statewide bacteria water quality objectives were adopted by the State Water Resources Control Board on August 7, 2018.

2.5 San Diego County Water Authority

The next public comment letter is from San Diego County Water Authority (SDCWA).

Summary

The SDCWA supports the Climate Change Readiness: Sustainable Local Water Supply project to review beneficial uses and water quality objectives to support local water supply development and use of recycled water. This project is related to the Tier 2 project from the 2014 Triennial Review. Limited staff resources impeded progress on the 2014 project.

The SDCWA has provided recommended clarifications to the Basin Plan regarding water supply reservoirs. The SDCWA has also expressed an interest in working collaboratively with the San Diego Water Board and providing additional resources toward developing a Basin Plan amendment to support local water supply development and use of recycled water. The comment letter dated May 16, 2018, contains specific suggested language changes to the Basin Plan. A copy of this letter was included as an attachment to their comment letter dated August 6, 2018.[3]

Specific Comments

> The Water Authority and its member agencies that own and operate drinking water reservoirs have developed a series of recommendations regarding water supply reservoirs to be addressed through clarifications to the Basin Plan. . . . The clarifications would streamline permitting of potable reuse projects, encourage local supply development, and support water supply management by water agencies. These recommendations could be addressed under Project 4 in support of sustainable water supply for climate change readiness.
>
> We have been requesting that the San Diego Water Board develop a reservoir Basin Plan amendment since before the last Triennial Review. We understand that the San Diego Water Board has limited resources and are supportive of staff's recommended collaborative approach to leverage resources to support this project. Since the recommendations we developed are primarily clarifications to beneficial uses and implementation of water quality objectives, we anticipate this component of the project would require significantly less time to complete than most other Basin Plan amendments.

[3] See section 3.0 Comments Received for complete copies of the comment letters.

San Diego Water Board Response

Thank you for supporting the Climate Change Readiness: Sustainable Local Water Supply project. In addition to collaborating with the SDCWA, the San Diego Water Board is also working with the South Orange County Water Authority and affected member agencies in collaboration to develop additional resources to pursue the projects that support climate change goals and drought preparedness.

2.6 San Juan Basin Authority

The next public comment letter is from San Juan Basin Authority (SJBA).

Summary

The SJBA supports the Climate Change Readiness: Sustainable Local Water Supply project to evaluate and possibly revise water quality objectives for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses. SJBA supports this project which will help meet recycled water goals established in the State Recycled Water Policy and develop local water supplies. The project also will be consistent with the *Salt and Nutrient Management Plan for the San Juan Basin* and the San Diego Water Board's Practical Vision.

Specific Comments

> The purpose of this letter is to express the support of the San Juan Basin Authority (SJBA) for the following triennial review project: Project 4: Climate Change Readiness: Sustainable Local Water Supply . . . Evaluate and possibly revise water quality objectives (WQOs) for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses.
>
> **Consistency of Project 4 with State Recycled Water Policy.** Project 4 seeks to support climate change readiness and local water supply development, in part, by modifying the Basin Plan to allow expanded use of recycled water. SJBA is interested in supporting Basin Plan modifications proposed under this project, as the Basin Plan modifications proposed under Project 4 would:
>
> - encourage additional recycled water use which will help meet recycled water goals established by the State Water Resources Control Board (SWRCB) within the State Recycled Water Policy,
>
> - support the development of local water supplies which would be sustainable during periods of drought brought on by climate change, and

- implement findings developed in SOCWA's 2015 Salt and Nutrient Management Plan (SNMP) for the San Juan Basin, which South Orange County Wastewater Authority (SOCWA) and regional stakeholders, including SJBA, developed pursuant to the Recycled Water Policy.

SOCWA Commitment to Project. SOCWA has committed to develop technical information required to support the proposed Basin Plan modifications within the San Juan Basin by:

- implementing an ongoing regional monitoring effort,
- initiating technical studies and antidegradation analyses which would support of the Basin Plan modifications, and
- initiating efforts to update the existing SNMP.

SJBA and SOCWA acknowledge that Regional Water Board staff resources are limited. To this end, SOCWA has reported it is prepared to collaborate with other regional stakeholders such as the San Diego County Water Authority to ensure that the Regional Water Board secures adequate funding to engage the staff resources necessary to move forward within Project 4.

Consistency with San Diego Water Board Practical Vision. The Draft 2018 Triennial Review Prioritized List concludes that Project 4 is consistent with Chapters 1, 4, and 5 of the San Diego Regional Water Board Practical Vision. SOCWA and SJBA . . . believe that Project 4 is also consistent with Chapter 2 (Monitoring and Assessment) of the Practical Vision.

San Diego Water Board Response

Thank you for supporting the Climate Change Readiness: Sustainable Local Water Supply project. The San Diego Water Board is working with the SOCWA, San Diego County Water Authority, and affected member agencies in collaboration to develop additional resources to pursue the projects that support climate change goals and drought preparedness.

2.7 Santa Margarita Water District

The next public comment letter is from Santa Margarita Water District (SMWD).

Summary

SMWD supports the Climate Change Readiness: Sustainable Local Water Supply project to evaluate and possibly revise water quality objectives for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses. SMWD also supports working in a collaborative approach with SOCWA, other partner agencies and the San Diego Water Board to ensure adequate funding is available to pursue this project.

Specific Comments

> Santa Margarita Water District (District) supports the draft prioritized list and Project 4: Climate Change Readiness: Sustainable Local Water Supply. The District agrees with the assessment that sustainable local water supplies are a key component to preparing the region for periods of drought and extreme weather brought on by climate change.
>
> The District also acknowledges its responsibility in ensuring the San Diego Water Board has adequate resources to meet its ongoing obligations as well as advancing this project. We look forward to the partnership with South Orange County Wastewater Authority (SOCWA), our partner agencies and the San Diego County Water Authority to develop a collaborative approach with the San Diego Water Board to ensure it secures adequate funding to engage the staff resources necessary to move forward with Project 4.
>
> The staff recommendation in Project 4 highlights the District's critical path to expansion of its recycled water system in support of the State Recycled Water Policy by considering modification of the Basin Plan. We are deeply interested in supporting Basin Plan modifications proposed under this project, for the development of local water supplies which would be sustainable during periods of drought brought on by climate change. The recommendation supports the District and its partner agencies in SOCWA implementation of the 2015 *Salt and Nutrient Management Plan (SNMP) for the San Juan Basin*, which SOCW A and regional stakeholders developed pursuant to the Recycled Water Policy.

> The SNMP also concluded, in part, the existing Basin Plan groundwater quality objectives within the Middle San Juan and Middle Trabuco basins are not reflective of the existing groundwater quality and the San Juan Basin Authority has developed monitoring data to document the groundwater quality. The recommendation expressed in Project 4 is the next step for the region and we are committed to developing technical information required to support the proposed Basin Plan modifications within the San Juan Basin in support of the San Diego Water Board's efforts.
>
> The District agrees with the Draft 2018 Triennial Review Prioritized List conclusion that Project 4 is consistent with Chapters 1, 4, and 5 of the San Diego Regional Water Board Practical Vision. We also support SOCWA's assertion in its comment letter that Project 4 is also consistent with Chapter 2 (Monitoring and Assessment) of the Practical Vision.

San Diego Water Board Response

Thank you for supporting the Climate Change Readiness: Sustainable Local Water Supply project. The San Diego Water Board is working with SOCWA, San Diego County Water Authority, and affected member agencies in collaboration to develop additional resources to pursue the projects that support climate change goals and drought preparedness.

2.8 South Orange County Water Authority

The final public comment letter is from South Orange County Water Authority (SOCWA).

Summary

SOCWA supports the Climate Change Readiness: Sustainable Local Water Supply project to evaluate and possibly revise water quality objectives for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses. This project is consistent with the State Water Board’s Recycled Water Policy, Salt and Nutrient Management Plan for the San Juan Basin, and the San Diego Water Board’s Practical Vision. SOCWA is prepared to collaborate with other regional stakeholders and the San Diego Water Board to ensure adequate funding is available to pursue this project.

Specific Comments

The purpose of this letter is to express the support of the South Orange County Wastewater Authority (SOCWA) and our member agencies for the following triennial review project: Project 4: Climate Change Readiness: Sustainable Local Water Supply.

Consistency of Project 4 with State Recycled Water Policy. Project 4 seeks to support climate change readiness and local water supply development, in part, by modifying the Basin Plan to allow expanded use of recycled water. SOCWA and its member agencies are keenly interested in supporting Basin Plan modifications proposed under this project, as the Basin Plan modifications proposed under Project 4 would:

- encourage additional recycled water use which will help meet recycled water goals established by the State Water Resources Control Board (SWRCB) within the State Recycled Water Policy,

- support the development of local water supplies which would be sustainable during periods of drought brought on by climate change, and

- implement findings developed in SOCWA's 2015 *Salt and Nutrient Management Plan (SNMP) for the San Juan Basin*, which SOCWA and regional stakeholders, including SJBA, developed pursuant to the Recycled Water Policy.

Salt and Nutrient Management Plan. SOCWA's SNMP assessed salt and nutrient loads in each sub-basin within the San Juan Basin and assessed the consistency of existing and proposed recycle water use with existing Basin Plan water quality objectives. The SNMP concluded that the use of recycled water throughout most of SOCWA's service area was consistent with (1) existing Basin Plan groundwater quality objectives, (2) the Recycled Water Policy, and (3) the State of California antidegradation policy. The SNMP also concluded, however, that existing Basin Plan groundwater quality objectives within the Middle San Juan and Middle Trabuco basins:

- were not reflective of existing groundwater quality,
- were not achievable under existing or projected salt and nutrient loads, and
- are required to support development of recycled water use in the basins.

As documented within SOCWA's SNMP, however:

- recycled water opportunities now exist within these basins,
- available monitoring data demonstrate that existing Basin Plan groundwater objectives in these basins are not reflective of actual or attainable groundwater quality, and
- modification of the Basin Plan objectives is required in order to support implementing recycled water use.

SOCWA acknowledges that Regional Water Board staff resources are limited. To this end, SOCWA is prepared to collaborate with other regional stakeholders such as the San Diego County Water Authority to ensure that the Regional Water Board secures adequate funding to engage the staff resources necessary to move forward within Project 4.

Consistency with San Diego Water Board Practical Vision. The Draft 2018 Triennial Review Prioritized List concludes that Project 4 is consistent with Chapters 1, 4, and 5 of the San Diego Regional Water Board Practical Vision. SOCWA and its member agencies . . . believe that Project 4 is also consistent with Chapter 2 (Monitoring and Assessment) of the Practical Vision.

San Diego Water Board Response

Thank you for supporting the Climate Change Readiness: Sustainable Local Water Supply project. The ongoing discussions among San Diego Water Board staff, SOCWA and interested member agencies are key steps to leveraging resources in support of this project.

3.0 COMMENT LETTERS RECEIVED

The San Diego Water Board received eight comment letters from the public during the comment period from June 22, 2018 to August 6, 2018. Copies of the comment letters received are provided in order shown in Table 3.

Table 3. List of Comment Letters.

No.	Commenter	Letter Dated
1	City of San Diego	August 6, 2018
2	Clean Water Now	August 6, 2018
3	County of San Diego	August 6, 2018
4	San Diego Coastkeeper	July 20, 2018
5	San Diego County Water Authority	August 6, 2018
6	San Juan Basin Authority	August 6, 2018
7	Santa Margarita Water District	August 6, 2018
8	South Orange County Water Authority	August 6, 2018

The City of
SAN DIEGO
Transportation & Storm Water Department
Storm Water Division

August 6, 2018

VIA EMAIL TO: sandiego@waterboards.ca.gov

Jody Ebsen
Engineering Geologist
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Subject: City of San Diego Comments Regarding the Triennial Review Comments: CW845836

Dear Ms. Ebsen:

The City of San Diego (City) appreciates the opportunity to comment on the 2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin Draft Staff Report and Prioritized List. The City previously submitted comments on the Preliminary List of Proposed Projects on May 11, 2018. In general, the City is in support of the draft prioritized list of projects proposed by the Regional Water Quality Control Board (Water Board) and offers the following additional comments.

Prioritization of Triennial Review Projects

The City previously recommended assigning Tier 1 priority to the *Contact Water Recreation (REC-1) and Reservoir Beneficial Uses* projects. The City appreciates the assignment of Tier 1 priority to the *REC-1* project and request that the Water Board reconsider including the *Reservoir Beneficial Uses* project in the prioritized list, based on the discussion below.

In addition to prioritization, the City would like to offer the following updated comments on the Triennial Review projects.

Contact Water Recreation (REC 1) Water Quality Objectives

The City requests that the project description be updated to note that short and long-term regulatory updates are currently being considered in order to address important technical and policy issues that are critical to supporting REC-1 and to facilitate effective implementation efforts. Recommended actions include short-term NPDES permit updates to provide a compliance pathway, technical studies, as well as future updates to the Basin Plan. Consistent with the City's previous comments and discussions with Water Board staff, the key REC-1 issues include the following:

1. Updates to REC-1 Water Quality Objectives and Implementation Provisions to focus on reducing human health risk
2. Incorporate recent scientific advancements, including the use of human marker testing (e.g., HF183) to increase confidence in assessing risk and permit compliance
3. Move compliance points to target recreational beach areas to focus on areas with the greatest risk to human health
4. Update compliance schedules to incorporate the results of the proposed forthcoming studies and investigations, and streamline implementation efforts to focus on reducing human sources.

9370 Chesapeake Drive, Suite 100
San Diego, CA 92123
swppp@sandiego.gov

T (619) 235-1000
sandiego.gov

These requests are consistent with, and follow, the recommendations provided in the Draft Technical TMDL Report that was provided to the San Diego Water Board (Water Board) on September 11, 2017. As mentioned in the Draft Technical TMDL Report, the City, County of San Diego, and County of Orange provided funding, as requested by the Water Board, to complete several important projects, including the Surfer Health Study (SHS) and the Bacteria TMDL Cost Benefit Analysis (CBA). Water Board staff participated in the development of these projects and oversaw the data that were collected and analyzed under the guidance of the Southern California Coastal Waters Research Program (SCCWRP). These data were provided to the Water Board in the final SHS and CBA reports, regional reference studies, and the Draft Technical TMDL Report. Collectively, these studies and local monitoring data collected across the region demonstrate that water quality conditions are protective of recreational uses.

The City appreciates the San Diego Water Board's recognition of the importance of considering the latest science. Therefore, the City requests the Water Board members consider the important conclusions of these locally focused studies and related science, and include them in the 2018 Triennial Review amending the Basin Plan to accurately reflect this region's REC-1 beneficial use conditions.

Project 4: Climate Change Readiness: Sustainable Local Water Supply

In the City's May comment letter regarding the triennial review process, the City expressed support for the 'Beneficial Uses and Water Quality Objectives Related to Reservoirs' proposed item, and urged Tier 1 prioritization for the initiative. The Draft Staff Report and Prioritized List released on June 22, 2018 did not include a separate initiative on reservoir-related issues. The City understands that the Regional Board has limited staff resources to address the many important issues facing the watersheds within its jurisdiction. Although the City would prefer that a stand-alone reservoir item be included in the current triennial review process, the City appreciates the incorporation of a related initiative in the proposed Project 4 on Climate Change Readiness: Sustainable Local Water Supply and plan to be an active local partner to help this project succeed.

The City agrees with the fundamental premise underlying the Regional Board's inclusion of this initiative in Project 4—that expanding water recycling is a critical component of climate change readiness. The City provides drinking water to over 1.6 million San Diegans, and treats wastewater from the City of San Diego and 15 other cities and districts from a 450 square mile area with a population of over 2.2 million. An average of 180 million gallons of wastewater is treated by the City every day of the year. The City of San Diego is an industry-recognized leader in water reuse [aka recycled water]. Our two existing reclamation plants at North City and South Bay produce tertiary-treated 'purple pipe' water. This important source of supply helps to meet our region's water needs in a sustainable and cost-effective manner, using local production capacity to offset the need for expensive, imported potable water for certain industrial and agricultural applications.

Beyond simple 'purple pipe' water recycling, the City is under way with Pure Water San Diego, a landmark potable reuse initiative that, when fully implemented in 2035, will supply one-third of San Diego's water from highly-treated recycled water. Pure Water San Diego will provide a drought-proof, locally-controlled, reliable, and cost-effective water supply. It will be the first potable reuse project in California to utilize surface water augmentation, with the first phase of the project, set to come online in just three short years (2021),

augmenting Miramar Reservoir. The City is extremely proud of Pure Water San Diego and of being at the 'tip of the spear' on advanced water treatment technology and water supply policy. However, there are numerous regulatory and permitting requirements under existing law that make projects like this extremely complicated to implement, and difficult to build. The triennial review process can provide an opportunity to address some of these impediments in a thoughtful way, to better facilitate projects like Pure Water San Diego and support climate change readiness of the San Diego region.

Specifically, Project 4 includes the potential to address basin plan issues related to water reuse, providing an opportunity to assess beneficial uses and water quality objectives and possibly adopt changes that can help support the implementation, expansion, and efficient operation of water reuse projects in the San Diego area. Here are some examples.

> The Basin Plan establishes for reservoirs Beneficial Uses that compete with, and may be contradictory to, sustaining the original purpose of the reservoirs, which is drinking source water supply.
>
> Water Quality Objectives for nitrogen and phosphorus [aka biostimulatory substances], as currently stated in the Basin Plan, can be constraining of potable reuse reservoir augmentation projects because there is no provision whereby a "limiting nutrient" approach can be used to meet Beneficial Use goals.
>
> Some Water Quality Objectives for source water reservoirs are set to limits established for treated drinking water, even though the reservoirs store raw, untreated water. Meeting finished drinking water standards in a raw water reservoir prior to treatment is difficult, and provides no benefit to the health and safety of the public water supply.

San Diego's reservoirs play a unique and critical role in serving the drinking water needs of our community, and adapting the regulatory constructs *vis a vis* reservoirs to the community's needs—including expanding innovative supply options such as potable reuse—can be a powerful tool in ensuring the climate change readiness of the region. The Triennial Review process is an ideal opportunity to reassess the Basin Plan provisions related to reservoirs and update them in a way that both recognizes and reinforces the importance of these assets to the resilience of our drinking water supply, the furtherance of water reuse projects, and thoughtful and sustainable adaptation of infrastructure to the realities of a changing climate.

<u>Tijuana River Valley Water Quality Restoration</u>

As discussed in the City's May 18, 2018 comment letter, the City is supportive of efforts to advance restoration and solutions to water quality, sediment and trash issues in the Tijuana River Valley. The City recommends that language be added to clarify that the development of the TMDL would acknowledge the cross border component and primary role and responsibility of the federal government in addressing this international problem. Although the City supports the inclusion of this project in the Triennial Review, the City should not be named in any future TMDLs developed for the Tijuana River Valley.

Biological Objectives for Water Bodies in the San Diego Region

The City supports efforts to develop Biological Objectives in order to improve aquatic life beneficial use assessments and prioritize implementation efforts. The City supports inclusion of this project in the Triennial Review.

The City has been an active partner in developing Biological Objectives at the state and regional level, including funding special studies to better understand reference conditions and modified streams in the region, and ongoing efforts to develop causal assessment methods to identify the likely causes of impairment. The City recommends updating the project description to note the development of Biological Objectives will need to consider incorporation of appropriate biological expectations for different stream types (e.g., modified streams). Also, the need to develop a true weight of evidence approach should be referenced to encourage the best use of available data for assessments and to prioritize restoration and protection efforts.

Protecting water quality in reservoirs is key to the future of the Region's water supply. Applying the new Biological Objectives to upland streams that are tributary to drinking source water reservoirs will be an effective way of ensure the continued safety of public water supplies, in that streams supporting a diverse and robust mix of aquatic organisms are almost certainly in good shape from the perspective of drinking source water protection.

Thank you for the opportunity to comment on the 2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin Draft Staff Report and Prioritized List and to participate in discussions on this matter. If you have questions, please contact Ruth Kolb at (858) 541-4328 or at rkolb@sandiego.gov.

Sincerely,

Drew Kleis
Deputy Director

DK\rk

cc: Johnnie L. Perkins, Deputy Chief Operating Officer, Infrastructure/Public Works
Lee Friedman, Infrastructure Policy Advisor, Office of the Mayor
Kris McFadden, Director, Transportation & Storm Water Department
Vic Bianes, Director, Public Utilities Department
John Helminski, Assistant Director, Public Utilities Department
Peter Vroom, Deputy Director, Public Utilities Department
Davin Widgerow, Deputy City Attorney, City Attorney's Office
Amy Dorman, Program Manager, Public Utilities Department
Alejandra Gavaldón, Strategic Program Manager, Transportation & Storm Water Department
Ruth Kolb, Program Manager, Transportation & Storm Water Department
Jeffery Pasek, Project Officer II, Public Utilities Department
Carolyn Ginno, Senior Water Resources Specialist, Public Utilities Department
Rachel Davenport, Biologist III, Public Utilities Department

CLEAN WATER NOW

CLEAN WATER NOW is an innovative, science-based organization committed to solution-oriented collaboration as a means of developing safe, sustainable water supplies and preserving healthy ecosystems.

To: David Gibson Executive Officer
San Diego Regional Water Quality Control Board Region 9 Cal/EPA

Attention: Ms. Jody Ebsen

Date: August 6, 2018

Transmitted electronically by email (SOCWA Submission Attached Separately)

Re: *2018 Triennial San Diego Basin Plan Draft Prioritized List Review Comments CW845836*

From: Roger E. Bütow, Executive Director, Clean Water Now (CWN)

Ms. Ebsen:

CWN wishes to express its appreciation for the opportunity to provide comments regarding this matter.

We have reviewed the submissions provided to us by the South Orange County Wastewater Authority (SOCWA), San Juan Basin Authority (SJBA) and Santa Margarita Water District (SMWD). CWN enthusiastically supports all of their comments.

It is our understanding that Dr. Michael Welch continues to be engaged in this matter, and CWN cannot overemphasize how critical he was in our education as an NGO. We found his obvious expertise, ready correspondence accessibility, coupled with his input and guidance to be an invaluable resource as we attended the earlier series of Salt and Nutrient Management Plan (SNMP) meetings, as organized and chaired by SOCWA.

Relative novices regarding SNMP, with only some minimal understanding of the topic solely due to constant SJBA meeting attendance, he was a tremendous asset in our steep learning curve. We **thought** that we understood Basin Plan Objectives, but it became rapidly apparent that we needed more homework regarding the historical metrics, monitoring and attendant in-depth chemical analytic databases of the SOC watersheds.

The SOCWA comments regarding Project 4 (we assume heavily influenced by Dr. Welch's perspective) was especially notable to CWN as we have been the only local protectionist to consistently attend and track the document's main focus, i.e., the impacts regarding ***Project 4: Climate Change Readiness/Sustainable Local Water Supply***.

(cont.)

An important section to CWN as excerpted from the SOCWA submission:

> **SOCWA Commitment to Project.** SOCWA has committed to develop technical information required to support the proposed Basin Plan modifications within the San Juan Basin by:
>
> - implementing an ongoing regional monitoring effort,
> - initiating technical studies and antidegradation analyses which would support of the Basin Plan modifications, and
> - initiating efforts to update the existing SNMP.
>
> SOCWA acknowledges that Regional Water Board staff resources are limited. To this end, SOCWA is prepared to collaborate with other regional stakeholders such as the San Diego County Water Authority to ensure that the Regional Water Board secures adequate funding to engage the staff resources necessary to move forward within Project 4.

CAVEAT: CWN has some reservations about this portion, level of commitment and described collaboration: As a proviso, a specific stipulation if the Board agrees to, accepts, embraces and actively participates in the strategy outlined, CWN firmly requests that SOCWA members acknowledge and pursue the need to proactively include protectionist NGOs in the proposed follow-up, i.e., close collaborative interfacing with the SDCWA.

This should include being brought in for both technical and policy compliance discussions, true open transparency so that we may continue to perform and achieve our stated goals, objectives and respective mission statements in this matter.

In conclusion, we have separately attached the SOCWA submission which we concur with in PDF. If staff or Board members have any follow-up questions, please feel free to contact me personally using the information below.

Respectfully submitted,

Roger E. Bütow Founder & Executive Director
Clean Water Now
Mailing Address: P.O. Box 4711 Laguna Beach CA 92652
Direct landline: (949) 715.1912 (**VM after 6 rings/No TM**)
Cell: (949) 280.2225 (**VM/TM**)

Email: rogerbutow@clean-water-now.org
Website: www.clean-water-now.org

CLEAN WATER NOW (est. 1998) ***is an innovative, science-based organization committed to solution-oriented collaboration as a means of developing safe, sustainable water supplies while preserving healthy ecosystems.***

County of San Diego

RICHARD E. CROMPTON
DIRECTOR

DEPARTMENT OF PUBLIC WORKS
5510 OVERLAND AVE, SUITE 410
SAN DIEGO, CALIFORNIA 92123-1237
(858) 694-2212 FAX: (858) 694-3597
Web Site: www.sdcounty.ca.gov/dpw/

August 6, 2018

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

Dear Ms. Epsen:

TRIENNIAL REVIEW COMMENTS: CW845836

The contents of this letter are the same as submitted on May 16, 2018. The County of San Diego has resubmitted the letter so that the letter will be part of the Administrative Record. The County of San Diego appreciates the opportunity to provide comments on the preliminary list of proposed project descriptions for the 2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin. As one of the largest jurisdictions regulated under the San Diego Municipal Stormwater Permit, the County is very interested in water quality regulations that are reasonable, founded upon sound science, and that move our region forward by improving water quality in a productive and responsible way.

Contact Water Recreation (REC-1) Water Quality Objectives

The County fully supports the inclusion of the project *Contact Water Recreation (REC-1) Water Quality "Bacteria TMDL"* as a top priority (Tier 1) for the 2018 Triennial Review. The County has been actively collaborating with Regional Water Board staff on the 2014 Triennial Review project related to the same topic and supports action to incorporate into the Bacteria TMDL, the new science and information acquired through several locally funded studies, such as the Surfer Health Study and Cost-Benefit Analysis. We also support inclusion of the USEPA 2012 Recreational Criteria as an update to the REC-1 water quality objectives. Evaluating bacteria standards and corresponding TMDL changes are a top priority for the County of San Diego. The County strongly encourages the Regional Water Board's support of the timely completion of these projects. Because the deadlines for compliance with the TMDLs are rapidly approaching, it is critical to incorporate the latest scientific information into the TMDL now, rather than waiting until after the Investigative Order for San Diego River. The County will continue to support this project in any way possible to facilitate the evaluation of bacteria standards and TMDL changes. The County proposed specific changes to the Bacteria TMDLs as part of the Report of Waste Discharge submitted in December 2017. We look forward to reviewing Regional Water Board staff's

recommended changes to the TMDL, as well as subsequent Water Board workshops and hearings on this topic.

Tijuana River Valley Water Quality Restoration

The County supports the 2018 Triennial Review Project *"Tijuana River Waters Valley Water Quality Restoration"* if the focus of the proposed project is to address the water quality of transboundary flows into the Lower Tijuana River Valley. The County recommends that language be added to clarify that the development of the TMDL would acknowledge the cross-border component and role and responsibility of the federal government. Although we support this project, the County should not be assigned waste load reductions in any future TMDLs developed for the Tijuana River Valley.

We share with you the goal of clean water in the San Diego Region, and we look forward to continued collaboration on the Triennial Review projects. Please contact me at (858) 694-3672 or todd.snyder@sdcounty.ca.gov if you have any questions or comments.

Sincerely,

TODD E. SNYDER, Manager
Watershed Protection Program

SAN DIEGO COASTKEEPER

July 20, 2018

San Diego Regional Water Quality Control Board
2375 Northside Drive,
Suite 100 San Diego, CA 92108
Attn: Jody Ebsen
sandiego@waterboards.ca.gov

Sent via email

Re: Triennial Review Comment: CW845836

Dear Ms. Ebsen:

Thank you for the opportunity to comment on the Triennial Review of the Water Quality Control Plan for the San Diego Basin, Draft Staff Report and Prioritized List (Draft List). Please accept these comments on behalf of San Diego Coastkeeper (Coastkeeper). Coastkeeper is a non-profit organization working to protect and restore the San Diego region's bays, beaches, watersheds, and ocean.

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) shares this goal. The Mission Statement of the San Diego Water Board is to develop and enforce water quality objectives and implementing plans that will best protect the area's waters while recognizing our local differences in climate, topography, geology and hydrology. The comments provided below are intended to assist the San Diego Water Board with developing Triennial Review projects that will achieve our common goal of improving water quality in the San Diego Region.

Coastkeeper's main concern with the Draft List is the extremely limited resources available to the San Diego Water Board to administer the Basin Plan and implement Triennial Review Projects (2 person-years [PYs] per year). The Draft List should be limited to projects that have the highest likelihood of improving water quality with the available resources. To that end, Coastkeeper has the following comments.

Project 1: Tijuana River Valley Water Quality Restoration Should be the Highest Priority Project and be Allocated the Bulk of the PYs Allocated to Basin Plan and Triennial Review Project

Coastkeeper agrees that the restoration of the Tijuana River Valley should be the highest priority project and requests that sufficient resources be directed to this Project to ensure successful completion. The San Diego Water Board is well aware of the need to address the public health risks and environmental damage that have resulted from the discharges of waste from Mexico. Significant political and regulatory momentum has been generated

over the past year to address and resolve this issue, and Coastkeeper is pleased that the San Diego Water Board is committed to keep moving in the direction to restore this important waterbody so that the Public may enjoy Key Beneficial Uses of the Tijuana River Valley.

Project 2: Biological Objectives for Water Bodies in the San Diego Region is Properly Listed as the Second Priority and Sufficient Resources Should be Allocated to this Project to Ensure that the Public Hearing is Conducted Between July and December 2018

Coastkeeper again wishes to reiterate our strong support the inclusion of biological objectives (BOs) into the Triennial Review and as a Basin Plan amendment. BOs will provide the San Diego Water Board and Dischargers the tool to identify impaired water bodies, the causes of the impairment, and the most effective means to restore the water body.

For the first forty-plus years of the Clean Water Act's implementation, regulators and the public alike have largely focused on the chemical integrity of our waters. This, despite the first sentence of the Act itself stating that, "the objective of this Act is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."[1] We believe the addition of both narrative and numeric biological objectives to the assessment of our waters' health is long overdue.

Coastkeeper is supportive of a scheme in which BOs complement and coexist with the existing objectives that are currently in the Basin Plan. Existing chemically-focused objectives will continue to protect and restore those beneficial uses for which BOs are not the best indicator or measure. Both on their own and alongside existing objectives, BOs serve to tell a more complete story over time of our region's water body health and the health of the aquatic life within those waters.

BOs are able to give us a more complete picture of the ecological health of our streams because BOs integrate both chemical and physical stream parameters into an objective score. And because BOs integrate data over time we are given a better understanding of the health of our waters than chemical objectives, which merely give an instantaneous snapshot of a waterbody's health.

Coastkeeper looks forward to continuing to work with the Regional Board during the development of BOs in our region.

[1] 1 33 USC 1251 Section 101

Project 3: Contact Water Recreation (REC-1) Water Quality Objectives Should be Removed from the Draft List

Coastkeeper remains supportive of Regional Board action aimed at identifying sources of REC- 1 impairment, including human bacteria inputs, and addressing those sources through Investigative Orders, enforcement actions, and amendments to TMDLs to include wastewater agencies contributing to impairments through exfiltration. To the extent that this proposed project aims to accomplish that goal alone, we are supportive.

We do not, however, support region-wide or site-specific Basin Plan amendments to REC-1 objectives or amendments to how those water quality objectives are assessed. We respectfully request removal of review of REC-1 water quality objectives and/or implementation plans, as we do not believe there exists sufficient data to support such amendments. We also note the State Water Board is in the process of amending REC-1 standards statewide and we believe any local actions do to so would be duplicative, an inefficient use of local Regional Board staff resources, and unnecessary.

Project 4: Climate Change Readiness: Sustainable Local Water Supply Should be Removed from the Draft List

Due to the lack of sufficient resources this Project should be removed from the list. The San Diego Water Board acknowledges that available resources "are not expected to be sufficient to lead and complete this Project within the next three years" and suggests that resources from the South Orange County Water Authority (SOCWA) and the San Diego County Water Authority (SDCWA) could be used to engage in a collaborative approach to this Project. The Draft List does not state that such agreements have been made or forthcoming. This lack of resources and/or outside funding dictates that this Project should be removed from the Draft List.

While Coastkeeper is supportive of the San Diego Water Board's commitment to reduce the Region's use of imported water, we are concerned the Board is considering weakening water quality objectives to achieve this goal. As a reminder, the Mission Statement of the San Diego Water Board is to **develop and enforce water quality objectives and implementing plans that will best protect the area's waters** while recognizing our local differences in climate, topography, geology and hydrology. Any proposed weakening to the existing water quality objective for total dissolved solids must still be protective of the basin's surface water and groundwater to meet the designated beneficial uses of those waters.

Sincerely,

Matt O'Malley
Executive Director & Managing Attorney

/s
Barry Pulver
Volunteer, Regulatory Affairs

Our Region's Trusted Water Leader
San Diego County Water Authority

August 6, 2018

California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108
Attn: Ms. Jody Ebsen

Subject: Triennial Review Comment: CW845836

Dear Ms. Ebsen:

The Water Authority is very supportive of Project 4: Climate Change Readiness: Sustainable Local Water Supply on the draft 2018 Triennial Review prioritized list, dated June 22, 2018. This project would review beneficial uses and water quality objectives to support local supply development and use of recycled water. It is consistent with your Practical Vision, Key Beneficial Use and Areas Concept, and supports climate change goals and drought preparedness.

The Water Authority and its member agencies that own and operate drinking water reservoirs have developed a series of recommendations regarding water supply reservoirs to be addressed through clarifications to the Basin Plan. These recommendations have been provided for discussion and to request feedback from San Diego Water Board staff. The recommendations were included in the attached coalition letter from the Water Authority and member agencies on the Triennial Review, dated May 16, 2018. The clarifications would streamline permitting of potable reuse projects, encourage local supply development, and support water supply management by water agencies. These recommendations could be addressed under Project 4 in support of sustainable water supply for climate change readiness.

We have been requesting that the San Diego Water Board develop a reservoir Basin Plan amendment since before the last Triennial Review. We understand that the San Diego Water Board has limited resources and are supportive of staff's recommended collaborative approach to leverage resources to support this project. Since the recommendations we developed are primarily clarifications to beneficial uses and implementation of water quality objectives, we anticipate this component of the project would require significantly less time to complete than most other Basin Plan amendments. We look forward to working together with San Diego Water Board staff, the Water Authority member agencies, and the South Orange County Wastewater Authority in an expeditious manner to advance this project.

Thank you for the opportunity to comment, and to work together with the Water Authority and member agencies to support our mutual goals. Please contact Lesley Dobalian, Principal Water Resources Specialist, with any questions at (858) 522-6747 or LDobalian@sdcwa.org.

Sincerely,

Robert R. Yamada
Director of Water Resources
San Diego County Water Authority

Attached: Triennial Review Comment Letter

Submitted electronically via: sandiego@waterboards.ca.gov

San Diego County Water Authority
4677 Overland Avenue • San Diego, California 92123-1233
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org

May 16, 2018

California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108
Attn: Ms. Jody Ebsen

Subject: Triennial Review Comment: CW845836

Dear Ms. Ebson:

The purpose of this letter is to request that the Triennial Review Project: Beneficial Uses and Water Quality Objectives Related to Reservoirs Project (Reservoir Project) be prioritized as Tier 1 for completion over the upcoming Triennial Review period. This project was identified by San Diego Water Board staff on the Preliminary List of Triennial Review projects, dated April 9, 2018. The Reservoir Project was developed through collaboration among the Water Authority and its member agencies that own and operate drinking water reservoirs, and Water Board staff.

Project would Protect Water Quality and Encourage Local Supply Development

There are 24 surface water reservoirs in San Diego County designed to support the region's water supply needs by capturing storm water runoff, storing imported water, serving as forebays to water treatment plants, and storing purified water for potable reuse projects. The local reservoirs are operated to maximize the use of local supply, offset dry-year shortfalls, and maintain emergency and carryover storage. The next increment of water supply for the San Diego Region will come from member agency potable reuse projects that primarily rely on reservoir augmentation. By 2035, nearly 20 percent of the region's supply is expected to come from potable reuse.

The Water Board's proposed Reservoir Project is important because it will support reservoir operations and maintenance, enhance protection of reservoir beneficial uses, and streamline permitting of reservoir potable reuse projects through clarifying how beneficial uses are to be protected and water quality objectives are to be implemented.

Project is Consistent with Practical Vision, Key Beneficial Use and Areas Concept, and Supports Climate Change Goals

The Reservoir Project is consistent with the Board's Practical Vision of achieving a sustainable local water supply by facilitating streamlined permitting of potable reuse through reservoir augmentation. It supports strategizing for healthy waters by continuing to protect the ocean environment through potable reuse, and encouraging protection of municipal water supply beneficial uses as they apply to reservoirs. By supporting development of drought proof supplies, the Reservoir Project also helps meet Water Board goals of climate resilience. Finally, the Reservoir Project is consistent with the Key Beneficial Use and Key Areas concept, which prioritizes drinking water reservoirs for water supply.

Progress to Date on Reservoir Project

Since it was included on the 2014 Triennial Review as a Tier 2 project, the Water Authority and member agencies refined the project to identify exact clarifications needed to the Basin Plan, which were compiled into a Report and provided to Water Board staff. Together with our member agencies, we met with Water Board staff on several occasions, along with the Metropolitan Water District of Southern California, to discuss the proposed Basin Plan modifications. We believe that Water Board staff found the proposed changes to be reasonable and are interested in moving forward, depending on resource availability. A copy of the Report with the proposed changes to the Basin Plan is attached to this letter

Resources to Work on Reservoir Basin Plan Amendment Project

The Water Authority would like to provide support to move the Reservoir Project forward for completion. Although it was identified on the last Triennial Review, there has been limited progress on developing a Basin Plan amendment due to lack of availability of Water Board staff resources. While we understand staff resources are limited, we anticipate this project would require only a portion of staff resources compared with other types of Basin Plan amendments since the proposed modifications are primarily clarifications to beneficial uses and implementation of water quality objectives. This project also aligns with the use of resources consistent with your Key Beneficial Uses and Key Areas concept related to water supply and drinking water reservoirs. In addition, we have a Water Board contract to fund your staff time to work on projects of mutual interest, and this is our highest priority under the contract. The Water Authority also has available funding that we can dedicate now towards developing technical work that your staff may determine is necessary to complete the Basin Plan amendment.

Thank you for your consideration of the Reservoir Project for prioritization on the Triennial Review. We also appreciate the time and consideration of your staff in

reviewing the Report, and meeting with the Water Authority and member agencies to discuss the Basin Plan amendment, and look forward to working together to complete this project. Please contact Lesley Dobalian, Principal Water Resources Specialist, with any questions at (858) 522-6747 or LDobalian@sdcwa.org.

Sincerely,

Robert R. Yamada
Director of Water Resources
San Diego County Water Authority

Brian Olney
Director of Water Quality and System Operations
Helix Water District

Albert C. Lau, P.E.
Director of Engineering & Planning
Padre Dam Municipal Water District

Tina White
City Manager
City of Poway

Peter Vroom
Deputy Director of Environmental Monitoring and Technical Service
City of San Diego

Cor Shaffer, PE, T5, D5
Operations Manager
Santa Fe Irrigation District

Pete Baranov
Director of Water Quality
Sweetwater Authority

Attachment: Report: Draft Proposed Basin Plan Modifications for Water Supply Reservoirs, dated January 8, 2018

Submitted electronically via: sandiego@waterboards.ca.gov

DRAFT

PROPOSED BASIN PLAN MODIFICATIONS FOR WATER SUPPLY RESERVOIRS

January 8, 2018

California Regional Water Quality Control Board
Tier 2 Modifications Related to Potable Reservoir Operations

The *Water Quality Control Plan for the San Diego Basin* (Basin Plan) designates beneficial uses of waters of the State, establishes numerical and narrative water quality objectives to protect the designated beneficial uses, and establishes implementation policies for enforcing the water quality objectives. The California Regional Water Quality Control Board, San Diego Region (Regional Water Board) undergoes a triennial prioritization process for reviewing and updating the Basin Plan.

As part of the most recent triennial review process, the Regional Water Board in 2015 adopted a Tier 2 priority of evaluating Basin Plan beneficial uses and water quality objectives as they relate to reservoir operations and maintenance.[1] In adopting this Tier 2 priority, the Regional Water Board committed to meeting with regional water purveyors to explore the practicality of resource sharing in addressing reservoir-related Basin Plan issues.

Chapter 1 of the *San Diego Water Board Practical Vision*[2] introduces the concept of "key beneficial uses/key areas" in prioritizing Regional Water Board resources. In implementing its key beneficial uses/key area concept, the Regional Water Board (1) identified drinking water as a key beneficial use[3] and (2) identified drinking water reservoirs as a key area[4] where protection of water quality is of the highest priority.[5] The Water Authority and regional water agencies who own and operate potable water reservoirs share the Regional Water Board's priorities for protecting and enhancing the quality of water in San Diego Region reservoirs.

To this end, the Water Authority and regional water agencies have identified several issues of concern that that offer opportunities for Basin Plan modifications that (1) improve protection of beneficial uses of reservoirs, (2) improve the abilities of agencies to operate and manage drinking water reservoirs, and (3) encourage and promote the development of new and diverse water

---

1 See Attachment No. 1 to Regional Water Board Resolution No. R9-2015-0043, which was adopted by the Regional Water Board on May 13, 2015.

2 The *San Diego Water Board Practical Vision* was endorsed by the Regional Water Board through the adoption of Resolution No. R9-2013-0153 on November 13, 2013.

3 Regional Water Board Resolution No. R9-2017-0030 defines a key beneficial use as a beneficial use that is most critical to protecting human and environmental health.

4 Regional Water Board Resolution No. R9-2017-0030 defines a key area as waters where protection or restoration of water quality is most important in ensuring implementation of a given beneficial use.

5 Resolution No. R9-2017-0030 endorses drinking water as a key beneficial use and drinking water reservoirs as a key area, as set forth in the February 2017 Regional Water Board staff report entitled "Key Beneficial Uses and Key Areas – Focusing on What is Most Important".

supplies, consistent with the sustainable local water supply element of the November 2013 *San Diego Water Board Practical Vision.*

In assessing Basin Plan needs to protect water quality and encourage local supply development, the Water Authority and its member agencies propose the following clarifications on how Basin Plan beneficial uses are to be protected and water quality objectives are to be implemented:

I. Clarify Beneficial Use designations to (1) identify which San Diego Region reservoirs are connected to the imported water aqueduct system; (2) explicitly state that beneficial uses apply to all waters of the State, regardless of the source of the water; and (3) identify the potential for the implementation of potable reuse as part of the Municipal and Domestic Supply (MUN) beneficial use.

II. Clarify how existing Basin Plan objectives that implement secondary drinking water standards for total dissolved solids (TDS) and sulfate are to be implemented within water supply reservoirs.

III. Clarify how existing Basin Plan biostimulation objectives are to be implemented in the regulation of potable reuse projects.

IV. Clarify how Basin Plan dissolved oxygen, iron, and manganese requirements relate to thermally stratified reservoirs.

I. BENEFICIAL USE CLARIFICATIONS

Overview. The State Water Resources Control Board (State Water Board) has adopted a uniform list and description of beneficial uses that are applied throughout the State. The Municipal and Domestic Supply (MUN) beneficial use includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

The Basin Plan identifies 25 surface water reservoirs within the San Diego Region, and establishes a MUN beneficial use for each of these 25 surface reservoirs. The Basin Plan also establishes that designated beneficial uses apply not only to native waters, but to any imported waters that are stored in these reservoirs.

Potential Problem with Existing Basin Plan. The Basin Plan makes no distinction between reservoirs that are comprised of local runoff, reservoirs that are overwhelmingly comprised of imported water, or reservoirs that are comprised of a blend of both. Reservoirs used for storing imported water (particularly reservoirs that are overwhelmingly dominated by imported water) have different water quality protection needs than other San Diego Region reservoirs, and water quality and nuisance conditions in these reservoirs may be more readily be controlled by water agency management actions than within reservoirs that are significantly influenced by local runoff.

Additionally, while the Basin Plan notes that beneficial uses apply to native or imported waters stored in a reservoir, the Basin Plan:

- makes no mention of the potential for augmenting reservoir supplies with highly purified recycled water, and
- does not explicitly state that designated beneficial uses of reservoirs also apply to reservoirs filled with highly purified recycled water.

Proposed Revisions. No changes to Basin Plan beneficial use designations are proposed. To set the stage for Basin Plan implementation provisions that accommodate the Regional Water Boards "key beneficial uses/key areas" concept and distinguish between different reservoir types, however, it is recommended that Table 2-4 within Chapter 2 (Beneficial Uses) be revised to identify reservoirs that are:

- connected to the imported aqueduct system, and
- overwhelmingly comprised of waters from outside the watershed.

It is also recommended that minor text revisions be added to Chapter 2 (Beneficial Uses) to:

- explicitly state that designated beneficial uses apply to all waters of the state, regardless of the source of the water (e.g., imported, native, or recycled water/wastewater), and
- note that, consistent with State Water Board policies and regulations, storage reservoirs can be used for implementing potable reuse.

Specific proposed Basin Plan clarifications include:

1. Within Chapter 2 (Beneficial Uses), modify the fourth paragraph of the "Beneficial Uses for Specific Water Bodies" section (page 2-8) as follows:

   Beneficial uses apply to all designated waters of the State (inland surface waters, coastal waters, reservoirs, lakes, and ground waters), regardless of whether the source of the water is native water, imported water, recycled water, or water from some other source. The lack of a beneficial use does not rule out the possibility of existing or future beneficial uses. Existing beneficial uses which have not been formally designated in this Basin Plan are protected as well as designated beneficial uses.

2. Within Chapter 2 (Beneficial Uses), modify the first paragraph of the "Reservoirs and Lakes" section (page 2-13) as follows:

   The water resources with the greatest diversity of beneficial uses in the Region are the man-made water storage reservoirs and lakes. Located in nearly all of the Region's hydrologic units, these reservoirs and lakes intercept surface runoff and store imported water supplies. Consistent with policies established by the State Water Resources Control Board Division of Drinking Water, some reservoirs may also be used for implementing potable reuse, where highly purified recycled water is used to augment supplies in reservoirs that serve as a source of raw water supply to potable water treatment facilities. As such, the storage reservoirs serve as (1) sources of supply for municipalities, agricultural areas, and industrial operations; (2) recreational bodies; and (3) habitats for fish and wildlife. In a few cases, such as reservoirs used primarily for drinking water, REC-1 uses can be restricted or prohibited by the entities that manage these waters. Many of these reservoirs, however, are designated as potential for REC-1, reflecting federal Clean Water Act Goals.

3. Within Chapter 2 (Beneficial Uses), modify Table 2-4 titled "Beneficial Uses of Reservoirs and Lakes" (pages 2-56 and 2-57) by adding the following new footnote "2" to the MUN bullets of the following reservoirs: Diamond Valley Lake, Hodges Reservoir, Lake Skinner, Olivenhain Reservoir, San Dieguito Reservoir, Lake Dixon, Miramar Reservoir, Lake Murray, Lake Jennings, Lake Poway, San Vicente Reservoir, El Capitan Reservoir[6], Sweetwater Reservoir, and Lower Otay Reservoir:

   [2] *Reservoir connected to the imported water aqueduct system.*

4. Within Chapter 2 (Beneficial Uses), modify Table 2-4 titled "Beneficial Uses of Reservoirs and Lakes (pages 2-56 and 2-57), by adding the following new footnote "3" to the MUN bullets of the following reservoirs: Diamond Valley Lake, Lake Skinner, Lake Dixon, Lake Poway, Miramar Reservoir, Lake Murray, Lake Jennings, and San Vicente Reservoir.

   [3] *Reservoir typically comprised of more than 90 percent imported or other waters conveyed from outside the watershed.*

5. Within Chapter 2 (Beneficial Uses), modify Table 2-4 titled "Beneficial Uses of Reservoirs and Lakes (pages 2-56 and 2-57), by adding the following new footnote "4" to the MUN bullets of the following reservoirs: Diamond Valley Lake, Lake Skinner, Olivenhain Reservoir, San Dieguito Reservoir, Lake Dixon, Lake Poway, Miramar Reservoir, Lake Murray, Lake Jennings, San Vicente Reservoir, Sweetwater Reservoir, and Lower Otay Reservoir.

   [4] *Terminal reservoir which provides raw water supply directly to a potable water filtration plant.*

Benefits of Implementing the Recommended Basin Plan Modifications. The proposed clarifications within Chapter 2 (Beneficial Uses) of the Basin Plan would explicitly state the intent of the Basin Plan that designated beneficial uses apply to all waters of the State, regardless of source (e.g. native water, imported water, wastewater, purified recycled water, or waters from other sources). The clarifications also set the stage for consideration of imported water storage benefits and potable reuse benefits in establishing and interpreting Basin Plan water quality objectives and implementation policies.

II. SECONDARY DRINKING WATER STANDARDS

Overview. The Basin Plan establishes that all waters designated as MUN shall not contain concentrations of chemical constituents in excess of the State of California Secondary Maximum Contaminant Levels, Consumer Acceptance Limits established within Section 64449, Title 22 of the *California Code of Regulations* (CCR).

The State Water Resources Control Board, Division of Drinking Water (DDW) establishes secondary drinking water (consumer acceptance) standards within Section 64449 of the CCR to

[6] With the dam raise at San Vicente Reservoir, depending on lake water levels, it will be possible to convey imported water stored in San Vicente Reservoir by gravity to El Capitan Reservoir.

protect the aesthetics and consumer acceptability of the drinking water supply. Three tiers of secondary drinking water standards (recommended levels, upper levels, and short-term levels) are established for TDS and sulfate.[7] Basin Plan objectives for most San Diego Region imported water reservoirs are established at the "recommended" levels, as follows:

Constituent	Concentration (mg/l)				
	Secondary Maximum Contaminant Levels Consumer Acceptance Contaminant Level Ranges[1]			Basin Plan Objectives for Most Imported Water Reservoirs[2]	Typical Range in Imported Water
	Recommended	Upper	Short-Term		
TDS	500	1000	1500	500	400 – 800
Sulfate	250	500	600	250	100 – 300

1 From Table 64449-B, Title 22, Division 4, Chapter 15, Article 16, Section 64449 of the *California Code of Regulations*.

2 Basin Plan objectives for Lake Skinner, Olivenhain Reservoir, San Dieguito Reservoir, Lake Dixon, Hodges Reservoir, Miramar Reservoir, Lake Poway, Sweetwater Reservoir, and Otay Reservoir. Basin Plan objectives for San Vicente Reservoir and El Capitan Reservoir are 300 mg/l for TDS and 65 mg/f for sulfate.

As shown in the above table, Basin Plan objectives for TDS and sulfate have been established at or below the "recommended" level of 500 mg/l for TDS, 250 mg/l for chloride, and 250 mg/l for sulfate within the majority of the imported water reservoirs within the San Diego Region.

Potential Problem with Existing Basin Plan. Depending on hydrologic conditions in the western United States and the blend of Colorado River and State Water Project that is being delivered to the San Diego Region, concentrations of TDS and sulfate in the imported supply may exceed the "recommended" secondary drinking water standards of 500 mg/l for TDS and 250 mg/l for sulfate. Imported water supplies, however, never exceed the "upper" secondary drinking water standards of 1000 mg/l for TDS and 500 mg/l for sulfate.

As the Basin Plan is currently written, a reservoir filled with imported water that does not comply with existing Basin Plan TDS or sulfate objectives can be listed as Clean Water Act 303(d) impaired even though the upper limit drinking water standard is not exceeded, and no impacts to beneficial uses occur. Further, since concentrations of TDS and sulfate in imported water reservoirs are largely be dependent on the quality of imported water stored in the reservoir, waste load allocations implemented through a Total Daily Maximum Load (TMDL) process will be unlikely to result in meaningful water quality improvement.

Proposed Revisions. The intent of the Basin Plan should be (1) ensure that runoff into reservoirs is of sufficient quality to support and protect beneficial uses, but (2) recognize that within imported water reservoirs, reservoir quality is largely a function of the quality of the imported supply, and that the quality of imported water stored in these reservoirs by and in itself should not automatically trigger 303(d) listings and the need to implement TMDLs.

[7] The secondary drinking water standards also include a recommended standard of 250 mg/l for chloride and an upper chloride level of 1000 mg/l. Since San Diego Region imported water supplies never reach these values, chloride does not represent a compliance issue for imported water storage.

While this is difficult to achieve within the context of Clean Water Act requirements, it is possible to incorporate improved clarification and guidance in the Basin Plan which can be used to minimize the potential for listing reservoirs as 303(d) impaired as a result of imported water that does not meet Basin Plan objectives. To address this, specific proposed Basin Plan modifications include:

1. Within Table 3-2 of Chapter 3 (Water Quality Objectives), add footnote "e" to the TDS and sulfate objectives for watersheds that feature imported water reservoirs:

   e TDS and sulfate concentrations in imported water storage reservoirs (see Table 2-4) may be allowed to exceed the listed objectives more than 10 percent of the time, provided that the exceedance is due to the quality of the imported water stored or blended within the reservoir.

   Footnote "e" would be added to the TDS and sulfate objectives within the following watersheds:

   - Hydrologic Subarea (HSA) 902.35 (Diamond Valley Lake),
   - Hydrologic Area (HA) 902.4 (Lake Skinner),
   - HSA 904.5 (Olivenhain Reservoir and San Dieguito Reservoir),
   - HA 904.6 (Lake Dixon),
   - HSA 905.2 (Hodges Reservoir),
   - HA 6.1 (Miramar Reservoir),
   - HA 6.2 (Lake Poway),
   - HA 907.2 (San Vicente Reservoir),
   - HA 907.3 (El Capitan Reservoir),
   - HA 902.2 (Sweetwater Reservoir), and
   - HA 910.3 (Lower Otay Reservoir).[8]

Benefits of Implementing the Recommended Basin Plan Modifications. The proposed clarifications of TDS and sulfate water quality standards for imported water reservoirs will:

- make the Basin Plan more consistent with the intent of the drinking water standards,
- lessen the potential for "automatic" 303(d) listings that are caused purely by imported water quality that does not comply with existing Basin Plan objectives TDS and sulfate objectives,
- minimize the potential for wasting RWQCB resources on TMDL processes where the "waste loads" are a function of imported water deliveries (which are not subject to TMDL restrictions), and
- supports the use of the reservoir for imported water storage.

III. NUTRIENT OBJECTIVES

[8] Lake Murray and Lake Jennings are excluded from this list, as imported water TDS and sulfate concentrations are always below the corresponding Basin Plan objectives for the Lake Murray and Lake Jennings watersheds.

Overview. The Basin Plan establishes as three-tiered approach for preventing biostimulation in inland surface waters:

- numerical concentration objectives for total phosphorus of 0.025 mg/l in standing bodies of water, 0.05 mg/l in waters flowing into standing bodies of water, and 0.1 mg/l within flowing waters.
- a narrative objective that concentrations of nitrogen and phosphorus, by themselves or in combination with any other nutrient, shall be maintained at levels below those that stimulate algae and emergent plant growth, and
- provisions that natural ratios of nitrogen to phosphorus are to be identified and upheld, and that in the absence of data a nitrogen:phosphorus (N:P) ratio of 10:1 shall be used.

Implementation of the total phosphorus numerical concentration objectives and the narrative biostimulation objective is straight-forward, but the Basin Plan N:P guidance can be subject to a broad degree of interpretation.

Adverse biostimulation can be prevented through controlling a single essential nutrient. The N:P ratio represents a useful parameter for inferring whether biostimulation is controlled by the lack of phosphorus or by a lack of nitrogen. As a general rule, N:P ratios above 10:1 indicate that phosphorus is a limiting nutrient, while values below 10:1 indicate nitrogen as a limiting nutrient. The intent of the Basin Plan N:P guidance is to (1) prevent the creation of conditions where biostimulation can occur, and (2) ensure that naturally-occurring limited nutrient conditions (if they exist) are maintained.

Potential Problems with Existing Basin Plan Requirement. As currently worded, the existing Basin Plan N:P guidance on N:P ratios is subject to a broad degree of interpretation, and:

- Receiving water nitrogen concentrations in excess of 10 times the applicable phosphorus numerical objective can be used as rationale to list waters as Clean Water Act 303(d) impaired, even though phosphorus may be the limiting nutrient and no data exists to indicate the occurrence of adverse biostimulation conditions.
- Existing Basin Plan N:P guidance is not explicit on how NPDES concentration limits for total nitrogen may be established for potable reuse projects, or how a "limited nutrient" approach can be used to ensure that potable reuse projects do not cause adverse biostimulation.

Agencies implementing potable reuse/reservoir augmentation projects need assurance that NPDES permits regulating such projects will contain achievable nitrogen concentration standards. Agencies also need assurance that Basin Plan nutrient objectives are sufficiently clear to prevent reinterpretation of the objectives by future regulators.

Proposed Revisions. Modify footnote 'a" of Table 3-2 as follows

1. Within Chapter 3 (Water Quality Objectives), modify the third paragraph of the "Biostimulatory Substances" section (page 3-9) as follows:

Concentrations of nitrogen and phosphorus, by themselves or in combination with other nutrients, shall be maintained at levels below those which stimulate algae and emergent plant growth. Threshold total Phosphorus (P) concentrations shall not exceed 0l05 mg/l in any stream at the point where it enters any standing body of water, nor 0.025 mg/l in any standing body of water. A desired goal in order to prevent plant nuisances in streams and other flowing waters appears to be 0.1 mg/l total P. These values are not to be exceeded more than 10% of the time unless studies of the specific body in question clearly show that water quality objective changes are permissible and changes are approved by the Regional Board. Analogous threshold values have not been set for nitrogen compounds; however, natural ratios of nitrogen to phosphorus are to be determined by surveillance and monitoring and upheld. If data are lacking, a ratio of N:P – 10:1 shall be used. In water supply reservoirs, operating agencies may comply with the biostimulation objective by (1) ensuring compliance with applicable phosphorus numerical objectives, and (2) managing reservoirs at high N:P ratios to sustain phosphorus-limited conditions.

Certain exceptions to the above water quality objectives are described in Chapter 4 (Implementation) in the sections titled "Discharges to Coastal Lagoons from Pilot Water Reclamation Plants"; "Discharges to Surface Waters"; and "Potable Reuse/Reservoir Augmentation".

2. Within Chapter 3 (Water Quality Objectives), modify footnote "a" of Table 3-2 "Water Quality Objectives, Inland Surface Waters" (page 3-16) as follows:

a *Concentrations of nitrogen and phosphorus, by themselves or in combination with other nutrients, shall be maintained at levels below those which stimulate algae and emergent plant growth. Threshold total Phosphorus (P) concentrations shall not exceed 0l05 mg/l in any stream at the point where it enters any standing body of water, nor 0.025 mg/l in any standing body of water. A desired goal in order to prevent plant nuisances in streams and other flowing waters appears to be 0.1 mg/l total P. These values are not to be exceeded more than 10% of the time unless studies of the specific body in question clearly show that water quality objective changes are permissible and changes are approved by the Regional Board. Analogous threshold values have not been set for nitrogen compounds; however, natural ratios of nitrogen to phosphorus are to be determined by surveillance and monitoring and upheld. If data are lacking, a ratio of N:P – 10:1 shall be used. In water supply reservoirs, operating agencies may comply with the biostimulation objective by (1) ensuring compliance with applicable phosphorus numerical objectives, and (2) managing reservoirs at high N:P ratios to sustain phosphorus-limited conditions. Note – Certain exceptions to the above water quality objectives are described in Chapter 4 in the sections titled Discharges to Coastal Lagoons from "Pilot Water Reclamation Plants"; ~~and~~ "Discharges to Surface Waters"; and "Potable Reuse/Reservoir Augmentation".*

3. Within Chapter 4 (Implementation), the "Discharges to Inland Surface Waters" section addresses the use of recycled water for augmenting streamflow in watersheds downstream from lakes or reservoirs used as a source of municipal water supply. To address the use of highly purified recycled water for augmenting municipal supply reservoirs (potable reuse), insert the following section within Chapter 4 (Implementation) immediately prior to the section entitled "Water Reclamation Under Resolution No. 81-16" (page 4-43):

POTABLE REUSE/RESERVOIR AUGMENTATION

The Regional Board recognizes the water supply and quality benefits associated with the use of highly purified recycled water to augment raw water supplies in water supply reservoirs (potable reuse). When implemented in accordance with potable reuse regulations established by the State Water Board Division of Drinking Water, such potable reuse can provide reservoirs with a sustainable source of supply that provides the same (or better) degree of public health protection as imported water.

Benefits provided by potable reuse include (1) reducing the region's dependence on and need for imported water, (2) helping to meet State-mandated recycled water use goals, and (3) reducing wastewater discharges to the ocean. Additionally, purified water treatment technology required to meet State Water Board Division of Drinking Water standards will reduce concentrations of salinity and dissolved minerals in the region's potable water supply, which would translate to region-wide reductions in salinity loads to groundwaters, reductions in salinity loads to surface waters, and reductions in salinity concentrations in recycled water supplies.

In conformance with provisions of the Clean Water Act, the Regional Water Board will regulate discharges of highly purified recycled water to reservoirs through issuance of NPDES permits that implement (1) applicable water quality plans and policies, (2) applicable Basin Plan water quality objectives, and (3) State Water Board Division of Drinking Water requirements for treatment performance, treatment technology, pathogen removal, reliability and redundancy, and reservoir operation.

Purified water treatment is projected to be highly efficient in removing phosphorus, but less efficient in removing nitrogen. As a result, phosphorus is projected to be the nutrient that limits the potential for biostimulation in purified waters. In reservoirs where phosphorus loads can be controlled by reservoir operators (e.g. reservoirs that are overwhelmingly comprised of purified or imported water), reservoir operators will be able to control the potential for biostimulation by sustaining phosphorus-limited conditions in the reservoir.

To comply with the Basin Plan objective for biostimulatory substances, the Regional Water Board shall establish the following NPDES concentration limits for potable reuse/reservoir augmentation discharges to water supply reservoirs:

(1) concentration limits for total phosphorus that implement the Basin Plan numerical water quality objective for phosphorus in standing waters (e.g., 0.025 mg/l), and

(2) concentration limits for total nitrogen that are reflective of proposed reservoir management operations, site-specific reservoir N:P loads, and projected sustainable limited nutrient conditions. For example, if reservoir operators can document reservoir management actions that achieve sustained phosphorus-limited conditions where N:P ratios exceed 80:1, NPDES concentration limits for total nitrogen may be established at 2 mg/l (a factor of 80 above the 0.025 phosphorus Basin Plan objective for standing waters).

NPDES permits regulating potable reuse/reservoir augmentation projects shall also include a comprehensive program for physical and biological monitoring in the reservoir to document compliance with the Basin Plan biostimulatory objective.

4. Within Chapter 4 (Implementation), change the title of the section entitled "Implementation of Ground Water Quality Objectives for Reclaimed Water Discharges" from mixed case to upper case, to reflect the fact that this section should be a subsection under the main subchapter heading

"Reclaimed Water Conformance with Water Quality Objectives", and not part of the "Discharges to Inland Surface Waters" subsection.

Benefits of Implementing the Recommended Basin Plan Modifications. The proposed clarifications to the Basin Plan nitrogen objective nutrient will encourage implementation of potable reuse projects by providing clarity on how NPDES concentration standards are to be implemented for regulating nitrogen and phosphorus in reservoir augmentation discharges. Such implementation of potable reuse will:

- help implement the sustainable local supply element of the 2013 San Diego Water Board Practical Vision,
- help implement statewide recycled water use goals established in the State Water Board Recycled Water Policy,
- reduce wastewater discharges to the ocean, and
- reduce salinity loads in irrigated potable waters and irrigated recycled waters, thus improving compliance with Basin Plan ground and surface water quality objectives, compliance with storm runoff goals, and compliance with applicable Salt and Nutrient Management Plans.

The clarifications will also ensure that achievable nitrogen concentration limits can be established for potable reuse projects, and will allow reservoir N:P ratios to be managed and sustained by water agencies at levels that prevent biostimulation.

IV. THERMAL STRATIFICATION IN RESERVOIRS

Overview. The Basin Plan assigns a WARM (warm water habitat) beneficial use to every San Diego Region reservoir, and assigns a COLD (cold water habitat) beneficial use designation to most of the region's reservoirs. The Basin Plan also establishes a 5.0 mg/l dissolved oxygen (DO) concentration objective for all fresh waters designated with WARM beneficial use, and a 6.0 mg/l DO objective in waters designated as COLD. Furthermore, the Basin Plan establishes iron and manganese objectives of 0.3 mg/l and 0.05 mg/l which apply to all municipal supply reservoirs.

Most San Diego Region reservoirs are sufficiently deep to thermally stratify during spring, summer and fall months. Under thermally stratified conditions, waters in the upper portion of the reservoir (epilimnion) are physically separated from waters in the lower portion of the reservoir (hypolimnion) by a thermocline. Once the thermocline forms in the spring, epilimnion waters remain oxygenated from the atmosphere, but waters of the hypolimnion are seasonally cut off from any natural oxygenation source from the atmosphere. As a result, once the thermocline forms in the spring, DO concentrations in the hypolimnion naturally decrease toward zero until the thermocline disappears in late fall and the reservoir becomes fully mixed (reservoir turnover) and oxygenated throughout the water column.

During such seasonal thermally stratified conditions, it should be noted that fish can move back and forth across the thermocline to seek desired DO or temperature conditions.

Thermally stratified conditions within reservoirs can also influence reservoir concentrations of iron and manganese. Naturally-occurring anaerobic conditions within the hypolimnion can cause bottom sediments to release manganese and iron into the hypolimnion, resulting in natural seasonal fluctuations in which iron and manganese concentrations in these deeper thermally-stratified waters can exceed the secondary drinking water standards of 0.3 mg/l for iron and 0.05 mg/l for manganese. These naturally-occurring seasonal variations in iron and manganese within the hypolimnion require increased attention on the part of water system operators. Reservoir operators seasonally adjust water blends and the depths at which water is withdrawn from the reservoir to improve the treatability of the withdrawn water and to ensure that the final treated potable supply complies with secondary drinking water standards for iron and manganese.

Potential Problems with Existing Basin Plan Requirement. The Basin Plan DO objectives are inconsistent with naturally-occurring seasonal phenomena that occur within the hypolimnions of thermally-stratified reservoirs, and the existing DO concentration limit cannot be met within hypolimnetic waters under natural summer and fall thermally-stratified conditions. Additionally, the Basin Plan is inconsistent with naturally-occurring variations in reservoir iron and manganese concentrations that result from thermal stratification.

Reservoir owners and operators are concerned that such naturally-occurring seasonal decreases in hypolimnion dissolved oxygen concentrations and increases in hypolimnion iron and manganese concentrations will result in every thermally-stratified reservoir within the San Diego Region being listed as 303(d) impaired. Water agencies and reservoir operators are also concerned that this inconsistency may constrain implementation of potable reuse projects or may result in enforcement actions against potable reuse projects once mandated receiving water monitoring data demonstrate the existence of these naturally-occurring seasonal reductions in hypolimnetic DO and increases in hypolimnetic concentrations of iron and manganese.

Proposed Revisions. Revise the Basin Plan Dissolved Oxygen Objective (page 3-25) as follows:

Water Quality Objective for Dissolved Oxygen

Dissolved oxygen levels shall not be less than 5.0 mg/l in inland surface waters with designated MAR or WARM beneficial uses, or less than 6.0 mg/l in waters with designated COLD beneficial uses. The annual mean dissolved oxygen concentration shall not be less than 7 mg/l more than 10% of the time. These dissolved oxygen concentration objectives shall not apply within the hypolimnions (e.g., waters below the thermocline) of thermally stratified reservoirs, as naturally-occurring, seasonal thermally-stratified conditions prevent the atmosphere from oxygenating hypolimnetic waters during such periods of stratification.

Water Quality Objective for Iron

Inland surface waters shall not contain iron in concentrations in excess of the numerical objectives described in Table 3-2. This iron concentration objective shall not apply during reservoir destratification (turnover) events, or within the hypolimnions (e.g., waters below the thermocline) of

thermally stratified reservoirs, as naturally-occurring, seasonal thermally-stratified conditions cause a reduction in hypolimnetic dissolved oxygen which allows iron to be naturally released into the hypolimnion from bottom sediments.

Water Quality Objective for Manganese

Inland surface waters shall not contain manganese in concentrations in excess of the numerical objectives described in Table 3-2. This manganese concentration objective shall not apply during reservoir destratification (turnover) events or within the hypolimnions (e.g., waters below the thermocline) of thermally stratified reservoirs, as naturally-occurring, seasonal thermally-stratified conditions cause a reduction in hypolimnetic dissolved oxygen which allows manganese to be naturally released into the hypolimnion from bottom sediments.

Benefits of Implementing the Recommended Basin Plan Modifications. The proposed clarifications to the Basin Plan DO, iron, and manganese objectives will acknowledge the occurrence of natural seasonal decreases in hypolimnion DO concentrations and increases in hypolimnion iron and manganese concentrations, and will prevent the need to list every thermally-stratified reservoir within the San Diego Region as 303(d) impaired. The proposed DO, iron, and manganese clarifications will also ensure that reservoir operators or agencies implementing potable reuse projects are not penalized or adversely impacted when reservoir data are presented to the Regional Water Board that demonstrate the occurrence of these natural seasonal reductions in hypolimnetic DO or increases in hypolimnetic iron and manganese.

SAN JUAN BASIN AUTHORITY
26111 Antonio Parkway • Rancho Santa Margarita, CA 92688 (949) 459-6400 FAX (949) 459-6463

August 6, 2018

David Gibson
Executive Officer
California Regional Water Quality Control Board
San Diego Region
Attn: Ms. Jody Ebsen
2735 Northside Drive, Suite 100
San Diego, CA 92108-2700

Dear Mr. Gibson:

SUBJECT: 2018 Triennial Basin Draft Prioritized List
Triennial Review Comment: CW845836

Thank you for the opportunity to comment on the Regional Water Board's June 22, 2018 report entitled *2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin, Draft Staff Report and Prioritized List.* The purpose of this letter is to express the support of the San Juan Basin Authority (SJBA) for the following triennial review project:

Project 4: Climate Change Readiness: Sustainable Local Water Supply

SJBA also supports the Project 4 staff recommendation presented in the triennial review report to:

> ***Project 4 Staff Recommendation****: Evaluate and possibly revise water quality objectives (WQOs) for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses.*

Consistency of Project 4 with State Recycled Water Policy. Project 4 seeks to support climate change readiness and local water supply development, in part, by modifying the Basin Plan to allow expanded use of recycled water. SJBA is interested in supporting Basin Plan modifications proposed under this project, as the Basin Plan modifications proposed under Project 4 would:

- encourage additional recycled water use which will help meet recycled water goals established by the State Water Resources Control Board (SWRCB) within the State Recycled Water Policy,

- support the development of local water supplies which would be sustainable during periods of drought brought on by climate change, and
- implement findings developed in SOCWA's 2015 *Salt and Nutrient Management Plan (SNMP) for the San Juan Basin*, which South Orange County Wastewater Authority (SOCWA) and regional stakeholders, including SJBA, developed pursuant to the Recycled Water Policy.

Salt and Nutrient Management Plan. SOCWA's SNMP assessed salt and nutrient loads in each sub-basin within the San Juan Basin and assessed the consistency of existing and proposed recycle water use with existing Basin Plan water quality objectives. As a partner with SOCWA, SJBA contracted the SNMP monitoring and reporting work on behalf of SOCWA and its affected member agencies. The SNMP concluded that the use of recycled water throughout most of SOCWA's service area was consistent with (1) existing Basin Plan groundwater quality objectives, (2) the Recycled water Policy, and (3) the State of California antidegradation policy. The SNMP also concluded, however, that existing Basin Plan groundwater quality objectives within the Middle San Juan and Middle Trabuco basins:

- were not reflective of existing groundwater quality,
- were not achievable under existing or projected salt and nutrient loads, and
- are required to support development of recycled water use in the basins.

Conclusions developed in the SNMP were consistent with prior groundwater quality evaluations completed within the San Juan Basin. The Regional Water Board during the 1990s modified Basin Plan groundwater quality objectives throughout a number of San Juan Basin watersheds in order to ensure that Basin Plan groundwater quality objectives were (1) reflective of actual groundwater quality, and (2) consistent with promoting recycled water use while protecting the existing quality of groundwater. At that time, however, evaluation of Basin Plan groundwater quality objectives in Middle San Juan and Middle Trabuco basins were deferred due to a lack of data and a lack of proposed recycled water use. As documented within SOCWA's SNMP, however:

- recycled water opportunities now exist within these basins,
- available monitoring data demonstrate that existing Basin Plan groundwater objectives in these basins are not reflective of actual or attainable groundwater quality, and
- modification of the Basin Plan objectives is required in order to support implementing recycled water use.

SOCWA Commitment to Project. SOCWA has committed to develop technical information required to support the proposed Basin Plan modifications within the San Juan Basin by:

- implementing an ongoing regional monitoring effort,
- initiating technical studies and antidegradation analyses which would support of the Basin Plan modifications, and
- initiating efforts to update the existing SNMP.

SJBA and SOCWA acknowledge that Regional Water Board staff resources are limited. To this end, SOCWA has reported it is prepared to collaborate with other regional stakeholders such as the San Diego County Water Authority to ensure that the Regional Water Board secures adequate funding to engage the staff resources necessary to move forward within Project 4.

Consistency with San Diego Water Board Practical Vision. The *Draft 2018 Triennial Review Prioritized List* concludes that Project 4 is consistent with Chapters 1, 4, and 5 of the *San Diego Regional Water Board Practical Vision*. SOCWA and SJBA (see Table 1 below) believe that Project 4 is also consistent with Chapter 2 (Monitoring and Assessment) of the Practical Vision.

Table 1
Consistency of Proposed Basin Plan Modifications (Triennial Review Project 4)
with the San Diego Water Board Practical Vision

Practical Vision Chapter	Consistency of Project 4 with Practical Vision
Chapter 1 Strategizing for Healthy Waters	Proposed Basin Plan modifications within the San Juan Basin will allow for increased recycled water use, which in turn will help reduce wastewater flows and mass emissions discharged to the ocean.
Chapter 2 Monitoring and Assessment	In support of the project, SOCWA member agencies and regional stakeholders have joined together to establish and fund a long-term comprehensive effort to monitor ground and surface water quality in the San Juan Basin. The monitoring contract is administered by SJBA on behalf of SOCWA and SJBA member agencies. This comprehensive monitoring effort will substantially increase understanding of ground and surface water quality and conditions in the San Juan Basin. Additionally, the monitoring effort is consistent with the Regional Water Board's *A Framework for Monitoring within the San Diego Region*.
Chapter 4 Proactive Public Outreach and Communication	SOCWA's stakeholder-driven SNMP process involved a comprehensive public outreach and communication program that solicited input from a variety of public and non-government stakeholders. SOCWA will continue to engage regional stakeholders as part of the planned update of the SNMP and as part of the process to support SNMP recommendations by modifying

	Basin Plan groundwater quality objectives in the Middle San Juan and Middle Trabuco basins.
Chapter 5 Strategy for Achieving a Sustainable Water Supply	Proposed Basin Plan modifications would implement the recommendations within SOCWA's SNMP that will support increased recycled water use within the San Juan Basin in a manner consistent with (1) protecting the quality of existing ground and surface water and (2) helping to achieve recycled water goals established within the State Water Resources Control Board Recycled Water Policy.

Please contact me at (949) 293-6236 if you have any questions or need any additional information. Thank you for the opportunity for input.

Sincerely,

Norris Brandt
Administrator

Santa Margarita Water District

August 6, 2018

California Regional Water Quality Control Board
San Diego Region
Attn: Ms. Jody Ebsen
2735 Northside Drive, Suite 100
San Diego, CA 92108-2700

SUBJECT: 2018 Triennial Basin Draft Prioritized List
Triennial Review Comment: CW845836

Dear Ms. Ebsen:

Thank you for the opportunity to comment on the San Diego Regional Water Quality Control Board's (San Diego Water Board) *2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin, Draft Staff Report and Prioritized List.* Santa Margarita Water District (District) supports the draft prioritized list and Project 4: Climate Change Readiness: Sustainable Local Water Supply. The District agrees with the assessment that sustainable local water supplies are a key component to preparing the region for periods of drought and extreme weather brought on by climate change.

The District also acknowledges its responsibility in ensuring the San Diego Water Board has adequate resources to meet its ongoing obligations as well as advancing this project. We look forward to the partnership with South Orange County Wastewater Authority (SOCWA), our partner agencies and the San Diego County Water Authority to develop a collaborative approach with the San Diego Water Board to ensure it secures adequate funding to engage the staff resources necessary to move forward with Project 4.

The staff recommendation in Project 4 highlights the District's critical path to expansion of its recycled water system in support of the State Recycled Water Policy by considering modification of the Basin Plan. We are deeply interested in supporting Basin Plan modifications proposed under this project, for the development of local water supplies which would be sustainable during periods of drought brought on by climate change. The recommendation supports the District and its partner agencies in SOCWA implementation of the 2015 *Salt and Nutrient Management Plan (SNMP) for the San Juan Basin*, which SOCWA and regional stakeholders developed pursuant to the Recycled Water Policy.

The SNMP also concluded, in part, the existing Basin Plan groundwater quality objectives within the Middle San Juan and Middle Trabuco basins are not reflective of the existing groundwater quality and the San Juan Basin Authority has developed monitoring data to document the groundwater quality. The recommendation expressed in Project 4 is the next step for the region and we are committed to developing technical information required to support the proposed Basin Plan modifications within the San Juan Basin in support of the San Diego Water Board's efforts.

The District agrees with the *Draft 2018 Triennial Review Prioritized List* conclusion that Project 4 is consistent with Chapters 1, 4, and 5 of the *San Diego Regional Water Board Practical Vision*. We also support SOCWA's assertion in its comment letter that Project 4 is also consistent with Chapter 2 (Monitoring and Assessment) of the Practical Vision. In support of the project, SOCWA member agencies and regional stakeholders have joined together to establish and fund a long-term comprehensive effort to monitor ground and surface water quality in the San Juan Basin. This comprehensive monitoring effort will substantially increase understanding of ground and surface water quality and conditions in the San Juan Basin. Additionally, the monitoring effort is consistent with the Regional Water Board's *A Framework for Monitoring within the San Diego Region*.

Please contact Don Bunts at (949) 459-6602 (donb@smwd.com) or me at (949) 459-6590 (danf@smwd.com) if you have any questions or comments. Thank you for the opportunity for input.

Very truly yours,
SANTA MARGARITA WATER DISTRICT

Daniel R. Ferons
General Manager

CC: Mr. David Gibson, SDRWQCB

South Orange County Wastewater Authority

August 6, 2018

California Regional Water Quality Control Board
San Diego Region
Attn: Ms. Jody Ebsen
2735 Northside Drive, Suite 100
San Diego, CA 92108-2700

Dear Mr. Gibson:

SUBJECT: 2018 Triennial Basin Draft Prioritized List
Triennial Review Comment: CW845836

Thank you for the opportunity to comment on the Regional Water Board's June 22, 2018 report entitled *2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin, Draft Staff Report and Prioritized List.* The purpose of this letter is to express the support of the South Orange County Wastewater Authority (SOCWA) and our member agencies for the following triennial review project:

Project 4: Climate Change Readiness: Sustainable Local Water Supply

SOCWA and our member agencies also support the Project 4 staff recommendation presented in the triennial review report to:

> ***Project 4 Staff Recommendation**: Evaluate and possibly revise water quality objectives (WQOs) for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses.*

Consistency of Project 4 with State Recycled Water Policy. Project 4 seeks to support climate change readiness and local water supply development, in part, by modifying the Basin Plan to allow expanded use of recycled water. SOCWA and its member agencies are keenly interested in supporting Basin Plan modifications proposed under this project, as the Basin Plan modifications proposed under Project 4 would:

- encourage additional recycled water use which will help meet recycled water goals established by the State Water Resources Control Board (SWRCB) within the State Recycled Water Policy,
- support the development of local water supplies which would be sustainable during periods of drought brought on by climate change, and
- implement findings developed in SOCWA's 2015 *Salt and Nutrient Management Plan (SNMP) for the San Juan Basin*, which SOCWA and regional stakeholders developed pursuant to the Recycled Water Policy.

Salt and Nutrient Management Plan. SOCWA's SNMP assessed salt and nutrient loads in each sub-basin within the San Juan Basin and assessed the consistency of existing and proposed recycle water use with existing Basin Plan water quality objectives. The SNMP concluded that the use of recycled water throughout most of SOCWA's service area was consistent with (1) existing Basin Plan groundwater quality objectives, (2) the Recycled water Policy, and (3) the State of California antidegradation policy. The SNMP also concluded, however, that existing Basin Plan groundwater quality objectives within the Middle San Juan and Middle Trabuco basins:

- were not reflective of existing groundwater quality,
- were not achievable under existing or projected salt and nutrient loads, and
- are required to support development of recycled water use in the basins.

Conclusions developed in the SNMP were consistent with prior groundwater quality evaluations completed within the San Juan Basin. The Regional Water Board during the 1990s modified Basin Plan groundwater quality objectives throughout a number of San Juan Basin watersheds in order to ensure that Basin Plan groundwater quality objectives were (1) reflective of actual groundwater quality, and (2) consistent with promoting recycled water use while protecting the existing quality of groundwater. At that time, however, evaluation of Basin Plan groundwater quality objectives in Middle San Juan and Middle Trabuco basins were deferred due to a lack of data and a lack of proposed recycled water use. As documented within SOCWA's SNMP, however:

- recycled water opportunities now exist within these basins,
- available monitoring data demonstrate that existing Basin Plan groundwater objectives in these basins are not reflective of actual or attainable groundwater quality, and
- modification of the Basin Plan objectives is required in order to support implementing recycled water use.

SOCWA Commitment to Project. SOCWA has committed to develop technical information required to support the proposed Basin Plan modifications within the San Juan Basin by:

- implementing an ongoing regional monitoring effort,
- initiating technical studies and antidegradation analyses which would support of the Basin Plan modifications, and
- initiating efforts to update the existing SNMP.

SOCWA acknowledges that Regional Water Board staff resources are limited. To this end, SOCWA is prepared to collaborate with other regional stakeholders such as the San Diego County Water Authority to ensure that the Regional Water Board secures adequate funding to engage the staff resources necessary to move forward within Project 4.

Consistency with San Diego Water Board Practical Vision. The *Draft 2018 Triennial Review Prioritized List* concludes that Project 4 is consistent with Chapters 1, 4, and 5 of the *San Diego Regional Water Board Practical Vision*. SOCWA and its member agencies (see Table 1 below) believe that Project 4 is also consistent with Chapter 2 (Monitoring and Assessment) of the Practical Vision.

Table 1
Consistency of Proposed Basin Plan Modifications (Triennial Review Project 4)
with the San Diego Water Board Practical Vision

Practical Vision Chapter	Consistency of Project 4 with Practical Vision
Chapter 1 Strategizing for Healthy Waters	Proposed Basin Plan modifications within the San Juan Basin will allow for increased recycled water use, which in turn will help reduce wastewater flows and mass emissions discharged to the ocean.
Chapter 2 Monitoring and Assessment	In support of the project, SOCWA member agencies and regional stakeholders have joined together to establish and fund a long-term comprehensive effort to monitor ground and surface water quality in the San Juan Basin. This comprehensive monitoring effort will substantially increase understanding of ground and surface water quality and conditions in the San Juan Basin. Additionally, the monitoring effort is consistent with the Regional Water Board's *A Framework for Monitoring within the San Diego Region*.
Chapter 4 Proactive Public Outreach and Communication	SOCWA's stakeholder-driven SNMP process involved a comprehensive public outreach and communication program that solicited input from a variety of public and non-government stakeholders. SOCWA will continue to engage regional stakeholders as part of the planned update of the SNMP and as part of the process to support SNMP recommendations by modifying Basin Plan groundwater quality objectives in the Middle San Juan and Middle Trabuco basins.
Chapter 5 Strategy for Achieving a Sustainable Water Supply	Proposed Basin Plan modifications would implement the recommendations within SOCWA's SNMP that will support increased recycled water use within the San Juan Basin in a manner consistent with (1) protecting the quality of existing ground and surface water and (2) helping to achieve recycled water goals established within the State Water Resources Control Board Recycled Water Policy.

Please contact Ms. Amber Baylor at (949) 234-5409 if you have any questions or need any additional information. Thank you for the opportunity for input.

Sincerely,

B. Burnett

Betty Burnett
General Manager