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
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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.

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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.
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> 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

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cc: Johnnie L. Perkins, Deputy Chief Operating Officer, Infrastructure/Public Works
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