Hi Fisayo,

Please see attached for the proposed revisions to items 7 & 8 of the Tentative Order and the proposed deletion of Item 3 of the G. Special Provisions of the Amended Master Reclamation Permit. We are looking forward approval of the Permit Amendment by the Board. This is the last item remaining for the City to receive SRF loan funding for the project and to proceed with the construction bidding to expand the recycled water facilities. Thank you for giving us further opportunity to comment on the proposed Permit.

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FINDINGS:

7. The State Water Resources Control Board Recycled Water Policy states that the appropriate way to address salt and nutrient issues is through the development of regional or subregional salt and nutrient management plans. The Regional Board adopted Resolution No. R9-2010-0125 on November 10, 2010 which endorsed the Guidelines for Salinity/Nutrient Management Planning in the San Diego Region (salt and nutrient management plan guidelines). The salt and nutrient management plan guidelines establish a standardized approach and framework for developing salinity and nutrient management plans within the San Diego Region. The development of the salt and nutrient management plans is expected to be a cooperative effort among local water and wastewater entities and local salt/nutrient contributing stakeholders. Consequently, this Order requires the City to participate in the development of a salt and nutrient management plan for the San Juan Groundwater Basin, while the South Orange County Wastewater Authority will lead the development of the salt and nutrient management plan.

8. The Regional Board adopted Resolution No. R9-2010-0125 on November 10, 2010 which endorsed the Guidelines for Salinity/Nutrient Management Planning in the San Diego Region (salt and nutrient management plan guidelines). This Order also requires the City to submit a workplan in consultation with the South Orange County Wastewater Authority within 180 days identifying proposed tasks and measures the City will implement as a stakeholder participating in development of a salt and nutrient management plan. The proposed tasks and measures to be implemented by the City must be based on the salt and nutrient management plan guidelines. The City's recycled water use areas are within the Prima Deshecha Hydrologic Subarea (HSA 901.31 and the Segunda Deshecha Hydrologic Subarea (HSA 901.32). Neither of these small coastal sub-basins is within any groundwater basin identified by the State of California Department of Water Resources in Bulletin No. 118 California's Groundwater. In accordance with criteria established in the salt and nutrient management plan guidelines, the Prima Deshecha and Segunda Deshecha sub-basins are defined as "Tier D" groundwater basins where recycled water use is in compliance with existing Basin Plan groundwater quality objectives. The adopted salt and nutrient management plan guidelines do not require the preparation of salt and nutrient management plans for Tier D basins. If in the future Tier D basins are required to have salt and nutrient management plans prepared, the City of San Clemente will prepare a plan in accordance with a timeline mutually agreed upon between the Regional Water Quality Control Board and the City of San Clemente.

REQUIREMENTS:
Delete Requirement No. 3:
The following shall be added as Special Provision 3 (Salt and Nutrient Management Plan) of Order No. R9-2003-0123:

In consultation with SOCWA the City shall submit a workplan within 180 days which will identify proposed tasks and measures the City will implement as a stakeholder participating in the development of a salt and nutrient management plan for the San Juan Groundwater Basin. Proposed tasks and measures to be implemented by the City must be based on the salt and nutrient management plan guidelines. Recommended tasks for development of salt and nutrient management plans can be found in Chapter 5 and Appendix A of the salt and nutrient management plan guidelines.