

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

**SAN DIEGO WATER BOARD RESPONSE TO COMMENTS ON  
TENTATIVE ORDER NO. R9-2012-0026**

The City of San Clemente (City) submitted comments on Tentative Order No. R9-2012-0026 (Tentative Order) by email dated February 1, 2012. The City's comments pertain to the requirements to participate in the development of a salt and nutrient management plan for the San Juan Groundwater Basin and the reporting associated with its participation as contained in Findings Nos. 7 and 8 Requirement No. 3 (Special Provision No. 3) of the tentative Order. As a result of the City's comments, Findings No. 7 and 8, and Requirement No. 3 of the tentative Order have been deleted (see items A, B, and D of the errata sheet). The City asserts that because its recycled water use areas are within the San Clemente Hydrologic Area (HA), and the San Clemente HA does not contain a high priority groundwater basin nor impact the San Juan Groundwater Basin, then the City should not be required to participate in salt and nutrient planning and reporting at this time.

In general, the San Diego Water Board concurs with the City's comments with the following clarification and explanation. Currently the City distributes recycled water to three use sites. Two of these use sites are located entirely within the San Clemente HA. New use sites to be added are also planned to be entirely within the San Clemente HA. Groundwater basins within the San Clemente HA can be categorized as Tier D-2 basins in accordance with the *Guidelines for Salinity/Nutrient Management Planning in the San Diego Region* (salt and nutrient management plan guidelines), dated November 10, 2010. As stated in the salt and nutrient management plan guidelines, recycled water compliance with existing Basin Plan salinity objectives is not a concern within the Tier D basins and salinity management plans are not required for these basins. Furthermore, discharges within the San Clemente HA are not expected to have any effects on waters in the San Juan Groundwater Basin, which is a Tier A (high priority) groundwater basin. Based on this information, the Tentative Order has been modified to remove the requirements for the City to participate in the development of a salt and nutrient management plan for the San Juan Groundwater Basin.

The City has one recycled water use site that straddles the San Clemente HA and the San Mateo HA. The use site is the 130-acre Bella Collina Towne & Golf Club golf course, of which 42 acres overlie the San Clemente HA and 88 acres overlie the San Mateo HA. The golf course has installed a brine interception and disposal system along the border of the San Mateo HA to reduce salt and nutrient loading to the basin. The San Mateo HA contains the San Mateo Groundwater Basin, which is categorized as a Tier B (medium priority) groundwater basin in accordance with the salt and nutrient management plan guidelines. The San Mateo Groundwater Basin is a principal drinking water aquifer of the United States Marine Corps Base, Camp Pendleton. Both water and wastewater agencies including Camp Pendleton, Santa Margarita Water District,

and the City may have interest in influencing groundwater salinity/nutrient management within the San Mateo Groundwater Basin. The San Diego Water Board expects the United States Marine Corps (USMC) to lead the salt and nutrient management planning effort for the San Mateo Groundwater Basin. Although the Order does not require it, the San Diego Water Board expects the City to participate in the planning effort along with the USMC and the Santa Margarita Water District.

The above described changes to the Tentative Order are contained in the *Errata Sheet for Tentative Order No. R9-2012-0026*.