



THE CITY OF SAN DIEGO

February 24, 2017

Sent via Electronic Mail Only: Kozelka.Peter@epa.gov; Joann.Lim@waterboards.ca.gov

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San Diego Regional Water Quality Board
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Peter Kozelka
United States Environmental Protection Agency
Region IX, WTR 2-3
75 Hawthorne Street
San Francisco, CA 94105-3901

Reference: Comment Revised Tentative Order No. 2017-0007

Dear Executive Officer:

Thank you for the opportunity to comment on the Revised Tentative Order No. R9-2017-0007. The City of San Diego (City) submits the following comments specifically on Section VI.C.7:

1. Request that table 8 (page 37) be modified to remove the category of North City Renewable Energy Facility and the associated tasks of design and construction. This project is not on the critical pathway to the production of potable reuse water and is still in the conceptual planning and coordination stage with other City departments, and as such the timeline is still uncertain.
2. Request that paragraph 7d (page 39) be footnoted as shown to reflect the commitment pursuant to the signed agreement with local stakeholders:

"d. Pure Water San Diego Potable Reuse Goals. The Discharger intends to expand Pure Water San Diego capacity potable reuse goals from January 2021 to December 2035 to achieve 83 MGD of potable reuse by December 2035. The possible locations for new recycled water/advanced purification treatment facilities include Harbor Drive, Camino Del Rio, and/or Mission Gorge are set forth in Table 9 below. Because the Discharger has committed* to implementing the Pure Water San Diego program as a condition of this CWA section 301(h) waiver, the 2035 goals that post-dates the term of this Order/Permit are is included below, with the expectation that details associated with each the 2035 goal and necessary additional or interim goals will be provided and included in compliance schedules in subsequent Orders/Permits as required tasks, so as to comply with the State and federal compliance schedule policies (State Water Board Resolution No. 2008-0025, Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits, and 40 CFR section 122.47). The Discharger is committed to implementing these goalsthe 2035 goal with the collaboration of the other members of the Metro Wastewater JPA."

* Pursuant to the 2014 Cooperative Agreement between the Discharger and San Diego Coastkeeper, San Diego County Surfrider, the Coastal Environmental Rights Foundation, and the San Diego Audubon Society.

Sincerely,

John J. Helminski
Assistant Director
Pure Water & Quality Assurance Branch

