



February 24, 2017

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

Joann Lim
California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

**Subject: Comment - Tentative Order No. R9-2017-0007 ("Tentative Order")
REQUEST FOR CONTINUANCE OF THE PUBLIC HEARING
Draft Revised NPDES Permit No. CA0107409 ("Permit")
Revised Compliance Schedule Point Loma Wastewater Treatment Plant
NPDES Modified Permit Renewal**

Dear Mr. Kozelka and Ms. Lim:

Padre Dam Municipal Water District (Padre Dam) appreciates the opportunity to comment on the revised compliance schedule for the Point Loma Wastewater Treatment Plant Modified Permit Renewal.

Padre Dam is one of twelve public agencies that make up the Metro JPA/Metro Commission. Metro JPA/Metro Commission member agencies are the cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City and Poway, the Lemon Grove Sanitation District, Otay Water District, and the San Diego County Sanitation District ("Participating Agencies"). The Participating Agencies make up about one-third of the Metro Wastewater System (including the Point Loma Wastewater Treatment Plant) flows and finances. The Participating Agencies have a long and productive history of working together with the City of San Diego since the Clean Water Program of the early 1990s to address regional issues of wastewater treatment, disposal and reuse.

Padre Dam supports the goals of the Pure Water Program and in September 2014 adopted a Resolution supporting the City of San Diego's Point Loma Wastewater Treatment Plant NPDES Modified Permit application. The original application included the near term goal of producing 15 mgd of potable reuse water by 2023.

From the perspective of ratepayer affordability, long-term Clean Water Act compliance for the Metro Wastewater System rests on efficient implementation of the Pure Water Program and the cost savings that would be realized if Secondary Equivalency for the Metro System is achieved and the Point Loma Wastewater Treatment Plant remains at Advanced Primary treatment. For the wastewater ratepayers, this balance between wastewater treatment and disposal and water supply enhancement requires that we have identified the lowest cost option to reach long-term Clean Water Act compliance.

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The original schedule and scope of Pure Water's Phase 1 recognized that time was needed to determine the feasibility of Secondary Equivalency as a compliance strategy. As Secondary Equivalency is pursued, the cost to wastewater ratepayers would be minimized to ensure that funds are only expended on activities that lead to long-term Clean Water Act compliance. Phase 1 of the Pure Water Program, as originally conceived, would utilize the existing 30 MGD investment in primary, secondary, and tertiary treatment paid for by the wastewater users at the North City Water Reclamation Plant. It was anticipated that there would be little cost to Phase 1 wastewater rate payers because the necessary wastewater facilities were existing.

The significant and long-term reduction being experienced in wastewater flows from water conservation requires us to revisit the current planning for Pure Water implementation. The accelerated schedule in the Modified Permit ignores the time that Padre Dam needs to assess the feasibility of Secondary Equivalency and thoughtfully arrive at the best and most affordable compliance strategy given current conditions.

If secondary equivalency is not achievable then it is our obligation to the ratepayers we represent to determine if there is a lower cost alternative for long-term Clean Water Act compliance than the currently contemplated Pure Water Program. Wastewater ratepayers cannot be expected to make an aggressive upfront investment that magnifies rate impacts when long-term Clean Water Act compliance may require upgrading the Point Loma Wastewater Treatment Plant to secondary treatment standards.

We recognize that Pure Water will also deliver a new, highly reliable water supply for the San Diego County region. Padre Dam supports this goal but does not believe it is the cost responsibility of wastewater ratepayers. It is Padre Dam's responsibility to determine if the most cost effective path to Clean Water Act compliance for our ratepayers. The original Pure Water Program schedule would have provided the time necessary to make that determination.

We believe it is important for the partners in the Metro System to work together on solutions for the region. Therefore, Padre Dam respectfully requests that the RWQCB only approve the prior, originally proposed Compliance Schedule and oppose the revised Compliance Schedule, and continue the public hearing currently scheduled for April 12, 2017, so that the Padre Dam, along with other Metro JPA/Metro Commission members, and City of San Diego can work through the above-noted concerns and provide additional comments to help the RWQCB with its decision at the hearing.

Thank you for your consideration of this very important matter.

Sincerely,



August A. Caires
Board President