



SAN JUAN BASIN AUTHORITY

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August 6, 2018

David Gibson
Executive Officer
California Regional Water Quality Control Board
San Diego Region
Attn: Ms. Jody Ebsen
2735 Northside Drive, Suite 100
San Diego, CA 92108-2700

Dear Mr. Gibson:

SUBJECT: 2018 Triennial Basin Draft Prioritized List
Triennial Review Comment: CW845836

Thank you for the opportunity to comment on the Regional Water Board's June 22, 2018 report entitled *2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin, Draft Staff Report and Prioritized List*. The purpose of this letter is to express the support of the San Juan Basin Authority (SJBA) for the following triennial review project:

Project 4: Climate Change Readiness: Sustainable Local Water Supply

SJBA also supports the Project 4 staff recommendation presented in the triennial review report to:

***Project 4 Staff Recommendation:** Evaluate and possibly revise water quality objectives (WQOs) for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses.*

Consistency of Project 4 with State Recycled Water Policy. Project 4 seeks to support climate change readiness and local water supply development, in part, by modifying the Basin Plan to allow expanded use of recycled water. SJBA is interested in supporting Basin Plan modifications proposed under this project, as the Basin Plan modifications proposed under Project 4 would:

- encourage additional recycled water use which will help meet recycled water goals established by the State Water Resources Control Board (SWRCB) within the State Recycled Water Policy,

- support the development of local water supplies which would be sustainable during periods of drought brought on by climate change, and
- implement findings developed in SOCWA's 2015 *Salt and Nutrient Management Plan (SNMP) for the San Juan Basin*, which South Orange County Wastewater Authority (SOCWA) and regional stakeholders, including SJBA, developed pursuant to the Recycled Water Policy.

Salt and Nutrient Management Plan. SOCWA's SNMP assessed salt and nutrient loads in each sub-basin within the San Juan Basin and assessed the consistency of existing and proposed recycle water use with existing Basin Plan water quality objectives. As a partner with SOCWA, SJBA contracted the SNMP monitoring and reporting work on behalf of SOCWA and its affected member agencies. The SNMP concluded that the use of recycled water throughout most of SOCWA's service area was consistent with (1) existing Basin Plan groundwater quality objectives, (2) the Recycled water Policy, and (3) the State of California antidegradation policy. The SNMP also concluded, however, that existing Basin Plan groundwater quality objectives within the Middle San Juan and Middle Trabuco basins:

- were not reflective of existing groundwater quality,
- were not achievable under existing or projected salt and nutrient loads, and
- are required to support development of recycled water use in the basins.

Conclusions developed in the SNMP were consistent with prior groundwater quality evaluations completed within the San Juan Basin. The Regional Water Board during the 1990s modified Basin Plan groundwater quality objectives throughout a number of San Juan Basin watersheds in order to ensure that Basin Plan groundwater quality objectives were (1) reflective of actual groundwater quality, and (2) consistent with promoting recycled water use while protecting the existing quality of groundwater. At that time, however, evaluation of Basin Plan groundwater quality objectives in Middle San Juan and Middle Trabuco basins were deferred due to a lack of data and a lack of proposed recycled water use. As documented within SOCWA's SNMP, however:

- recycled water opportunities now exist within these basins,
- available monitoring data demonstrate that existing Basin Plan groundwater objectives in these basins are not reflective of actual or attainable groundwater quality, and
- modification of the Basin Plan objectives is required in order to support implementing recycled water use.

SOCWA Commitment to Project. SOCWA has committed to develop technical information required to support the proposed Basin Plan modifications within the San Juan Basin by:

- implementing an ongoing regional monitoring effort,
- initiating technical studies and antidegradation analyses which would support of the Basin Plan modifications, and
- initiating efforts to update the existing SNMP.

SJBA and SOCWA acknowledge that Regional Water Board staff resources are limited. To this end, SOCWA has reported it is prepared to collaborate with other regional stakeholders such as the San Diego County Water Authority to ensure that the Regional Water Board secures adequate funding to engage the staff resources necessary to move forward within Project 4.

Consistency with San Diego Water Board Practical Vision. The *Draft 2018 Triennial Review Prioritized List* concludes that Project 4 is consistent with Chapters 1, 4, and 5 of the *San Diego Regional Water Board Practical Vision*. SOCWA and SJBA (see Table 1 below) believe that Project 4 is also consistent with Chapter 2 (Monitoring and Assessment) of the Practical Vision.

Table 1
Consistency of Proposed Basin Plan Modifications (Triennial Review Project 4)
with the San Diego Water Board Practical Vision

Practical Vision Chapter	Consistency of Project 4 with Practical Vision
Chapter 1 Strategizing for Healthy Waters	Proposed Basin Plan modifications within the San Juan Basin will allow for increased recycled water use, which in turn will help reduce wastewater flows and mass emissions discharged to the ocean.
Chapter 2 Monitoring and Assessment	In support of the project, SOCWA member agencies and regional stakeholders have joined together to establish and fund a long-term comprehensive effort to monitor ground and surface water quality in the San Juan Basin. The monitoring contract is administered by SJBA on behalf of SOCWA and SJBA member agencies. This comprehensive monitoring effort will substantially increase understanding of ground and surface water quality and conditions in the San Juan Basin. Additionally, the monitoring effort is consistent with the Regional Water Board's <i>A Framework for Monitoring within the San Diego Region</i> .
Chapter 4 Proactive Public Outreach and Communication	SOCWA's stakeholder-driven SNMP process involved a comprehensive public outreach and communication program that solicited input from a variety of public and non-government stakeholders. SOCWA will continue to engage regional stakeholders as part of the planned update of the SNMP and as part of the process to support SNMP recommendations by modifying

	Basin Plan groundwater quality objectives in the Middle San Juan and Middle Trabuco basins.
Chapter 5 Strategy for Achieving a Sustainable Water Supply	Proposed Basin Plan modifications would implement the recommendations within SOCWA's SNMP that will support increased recycled water use within the San Juan Basin in a manner consistent with (1) protecting the quality of existing ground and surface water and (2) helping to achieve recycled water goals established within the State Water Resources Control Board Recycled Water Policy.

Please contact me at (949) 293-6236 if you have any questions or need any additional information. Thank you for the opportunity for input.

Sincerely,



Norris Brandt
Administrator