

## CITY OF OCEANSIDE

## WATER UTILITIES DEPARTMENT



May 27, 2014
Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 | Street, 24th Floor
Sacramento, CA 95814

Comment Letter - General Order WDRs for Recycled Water Use

Dear Ms. Marcus:

The City of Oceanside appreciates the opportunity to comment on the proposed statewide general permit.

Findings #13 and General Provision #4 of the proposed general permit could be interpreted as a requirement for all basins to have a Salinity/Nutrient Management Plan. Resolution R9-2010-0125 and the *Proposed Guidelines for Salinity/Nutrient Management Planning in the San Diego Region (9)* specify a tiered approach and as such, not all basins are required to have a Salinity/Nutrient Plan. Language should be added to the proposed general permit to include or address the tiered approach.

Attachment A – NOI General Instructions states that the General Order may be used to replace individual waste discharge requirements. We request that language be added to the proposed general permit specifying that an agency with an existing recycled water permit be allowed to continue with the requirements of the existing permit.

Mark Hammond
Compliance Officer