



SWEETWATER AUTHORITY

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January 30, 2006

Ms. Selica Potter
Acting Clerk of the Board
State Water Resources Control Board
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Email: commentletters@waterboards.ca.gov

DENNIS A. BOSTAD
GENERAL MANAGER
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Subject: Comments on Draft 2006 303(d) list



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Dear Ms. Potter

Sweetwater Authority and its Governing Board appreciate your extension of the comment period on the proposed 2006 303(d) list, and this opportunity to further consider and provide input to the process.

General Comments

Sweetwater Authority is a public retail water agency in San Diego County. We own and operate two major drinking water reservoirs serving approximately 185,000 customers: Sweetwater Reservoir with a capacity of 28,800 acre-feet, and Loveland Reservoir with a capacity of 26,000 acre-feet. The two-reservoir system enables significant capture and use of "local water." In some wet periods, this has been a year's supply or more.

Consequently, we are focused through a multi-part strategy on preserving water quality in the Sweetwater River watershed, and the protection of the ability to use this resource sustainably. Sweetwater Authority welcomes and encourages the support of the State and Regional Boards in helping achieve this goal.

Both reservoirs are proposed for listing for multiple constituents: dissolved oxygen and total dissolved solids (TDS) for Sweetwater, and manganese, aluminum, and dissolved oxygen for Loveland. We do not believe the listings would benefit regional water quality for the following reasons:

- Drinking water reservoirs are extensively managed special-purpose water bodies that store local and imported water prior to treatment and distribution. Water quality treatment practices effectively treat or remove regulated constituents from drinking water in accordance with state and federal laws prior to distribution to ratepayers.

*A Public Water Agency
Serving National City, Chula Vista and Surrounding Areas*

- There is no viable solution for the removal of natural occurring elements prior to the water treatment process:
 - Aluminum and manganese are naturally occurring elements in the Loveland watershed, and not man-made; therefore, no party or use may be identified and held responsible to reduce loading to the reservoir.
 - Low levels of dissolved oxygen occur due to seasonal stratification in lakes and is another natural occurrence.
- Imported water causes increased TDS levels that cannot be controlled by Sweetwater Authority or other watershed stakeholders.
 - Water imported to the San Diego region by the San Diego County Water Authority from the Metropolitan Water District of Southern California typically exceeds the Region 9 Basin Plan objectives for TDS; consequently, no imported water impoundment could comply.
 - Additionally, Sweetwater Authority has proactively constructed an Urban Runoff Diversion System (URDS) around Sweetwater Reservoir to capture and treat urban runoff from the surrounding urbanized watershed. This \$15 million dollar facility has reduced TDS and other contaminants in Sweetwater Reservoir. The expense is ultimately borne by watershed residents and service area customers. Any additional expense of a 303(d) listing to these residents-taxpayers is neither warranted nor cost effective.

Requested State Board Action

Revise The State Board's "Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List" to acknowledge that waters designated "MUN" (or potentially for other beneficial uses) that are subject to natural impacts from their watersheds, unavoidable natural processes like seasonal stratification, and/or from storage of imported water, shall not be listed as impaired when a scientific weight-of-evidence approach indicates that the exceedance of Basin Plan standards is not caused by discharges in the watershed. This approach should be used to reevaluate the proposed 2006 listings before they are adopted.

Additional Considerations

Importantly, we are not requesting that our drinking water reservoirs be exempted from 303(d) listing because the State Water Resources Control Board and the Region 9 Water Quality Control Board are important allies in protecting the Sweetwater River watershed

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and its valuable water resources. If in the future discharges in the watershed cause these to be jeopardized, we will rely on this partnership to address these problems. Fundamentally, the goal of the Clean Water Act is to protect water bodies from degradation caused by the discharge of pollutants. It is not protective of water quality, however, to list a drinking water reservoir as impaired when the exceedance is not the result of discharge.

We appreciate the State Board's continuing support of Sweetwater Authority's ongoing efforts to manage and protect our water supply. However, we do not believe that the inclusion of Loveland and Sweetwater Reservoirs on the 2006-303(d) list will benefit the region's water resources.

We look forward to a collaborative resolution of this issue. Please be in touch with me, or Rick Alexander (619-409-6830) if you have questions or comments about this request, or if you need additional information.

Sincerely,



Dennis Bostad
General Manager

cc: Craig J. Wilson, State Water Resources Control Board
John Robertus, San Diego Regional Water Quality Control Board
Charles Yackly, City of San Diego – Water Department
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