



THE CITY OF SAN DIEGO



May 13, 2016

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Reference: Comment Letter – General Order for Recycled Water Use, as Revised

Dear Ms. Townsend:

Thank you for the opportunity to provide comments related to the proposed Revised Draft General Order for Recycled Water Use (Revised General Order). The City of San Diego (City) currently operates a robust recycled water system for users throughout the City's service area, and we are proud of our extensive history and exemplary record of protecting public health while maximizing beneficial reuse in the community.

The City shares the concerns expressed by the San Diego County Water Authority, as well as, WateReuse California in their respective comment letters for both the Draft and Revised Draft Order, and we offer the additional comment as follows:

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The prior order allowed a discharger to make an election regarding their permit coverage. The initial proposed General Order allowed the San Diego Regional Water Resources Control Board (Regional Board) to make this decision which was problematic, as written, because it allowed the State Water Resources Control Board (State Board) or Regional Board to request changes in a permittee's program with no triggering event. The Revised General Order clarifies the State Board's intent to require termination of all current regional orders within three years and to make enrollment under the Revised General Order obligatory for those permittees.

The City appreciates the State Board's need for streamlined permitting and consistent regulations. However, regulation of recycled water use should be implemented at the Regional level because each Region has unique characteristics and challenges that cannot be accounted for in a statewide order. A "one size fits all" approach is inappropriate when considering the differences in groundwater recharge basins, agronomic rates, and municipality efforts across the state. The City of San Diego enjoys a very positive and effective working relationship with the Regional Board, and looks forward to continuing that relationship going forward.

In addition, the City's most recent order permitting recycled water use was adopted in December 2015. The City is currently implementing the new requirements under this Order and should not be expected to enroll under a new order for a minimum of five years from the



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effective date of the City's current recycled water permit, as issued by the Regional Board. Three years is insufficient time to completely revamp the City's current program, which is in the process of being implemented, to accommodate new permit requirements. Additional City resources would be required to accommodate both programs in the time allotted, which will amount to an unfortunate waste of tax and/or ratepayer dollars.

Again, the City proposes that the language be revised to state that coverage under an existing order can be maintained until such time as the discharger seeks to make a substantive change in its coverage, at which time the Regional Board could make a determination as to whether coverage could continue under the existing order or whether enrollment under the General Order is appropriate.

If you have any questions, please feel free to contact me at (619) 533-4112 or Ms. Rachel Davenport, NPDES Coordinator for the City of San Diego's Public Utilities Department, at (619) 758-2370.

Sincerely,



Lan C. Wiborg  
Deputy Director, Long-Range Planning & Water Resources Division

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