



San Diego County Water Authority

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March 13, 2013
Item No. 5
Supporting Document No. 4

December 18, 2012

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OTHER REPRESENTATIVE

County of San Diego

Mr. David Gibson, Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Subject: Revised Tentative Addendum No. 1 to Order No. 2000-10 for the Production and Purveyance of Recycled Water for San Elijo Joint Powers Authority, San Dieguito Water District, Santa Fe Irrigation District, and city of Del Mar

Dear Mr. Gibson:

The purpose of this letter is to provide comments on the requirement in the proposed tentative order for San Elijo JPA to submit a schedule for developing a salt and nutrient management plan (SNMP) for the San Elijo groundwater basin. To advance development of SNMPs, the San Diego County Water Authority worked with the Southern California Salinity Coalition and Regional Board staff to prepare guidelines for the development of SNMPs for the San Diego Region. These guidelines were approved by the Regional Board through the adoption of Resolution R9-2010-0125, *A Resolution Endorsing the Proposed Guidelines for Salinity and Nutrient Management Planning in the San Diego Region*. The purpose of the guidelines was to focus efforts in the San Diego Region on those groundwater basins where the development of a SNMP would bring some value in improving or maintaining groundwater quality. The Water Authority has further supported the development of five salt and nutrient management plans in the San Diego Region by obtaining funding from the Department of Water Resources through an integrated regional water management planning grant.

In the guidelines, there was an understanding that for Tier D basins, primarily coastal basins which are high in total dissolved solids (TDS) concentrations, there would be no requirement to develop a SNMP. This approach is consistent with what the State Board has allowed in other regions of the State. Per the guidelines, the San Elijo basin is a Tier D-2 basin. Therefore, a salt and nutrient management plan should not be required. We

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respectfully request that this requirement be removed from San Elijo JPA's permit. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743.

Sincerely,



Ken Weinberg
Director of Water Resources

Cc: Julie Chan, Chief Cleanup and Land Discharge Branch, RWQCB
John Bishop, Chief Deputy Director, SWRCB
Michael T. Thornton, General Manager, SEJPA