

California Regional Water Quality Control Board  
San Diego Region

# Response to Comments Report

**TIME SCHEDULE ORDER R9-2024-0110  
REQUIRING CITIZENS DEVELOPMENT CORPORATION TO COMPLY WITH  
REQUIREMENTS IN ORDER R9-2015-0013  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT CAG919003  
FOR GROUNDWATER EXTRACTION DISCHARGES TO LAKE SAN MARCOS**

July 23, 2024



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

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## INTRODUCTION

This report contains the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) responses to written comments received on *Time Schedule Order R9-2024-0110, Requiring Citizens Development Corporation to Comply with Requirements in Order R9-2015-0013, NPDES Permit CAG919003 for Groundwater Extraction Discharges to Lake San Marcos* (TSO).

The San Diego Water Board provided public notice of the release of the TSO on September 13, 2023, and provided a period of 30 days for public review and comment on the TSO. The public comment period ended on October 12, 2023.

<u>Written comments were received from:</u>	<u>Page</u>
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## Comments and Responses

The summarized written comments and San Diego Water Board responses are set forth below. The section of the TSO the comment pertains to is shown in parenthesis in each comment below. The responses include a description of any actions taken to revise the TSO in response to the comment. Proposed revisions to the TSO are in red-underline for added text and ~~red-strikeout~~ for deleted text.

## **COMMENTS AND RESPONSES**

### **1. Citizen Development Corporation (CDC)**

On October 12, 2023, CDC submitted comments on the TSO.

#### **1.1. Comment – Incorrect findings referenced**

CDC noted several incorrect finding references.

##### **Response**

The San Diego Water Board corrected the references.

#### **1.2. Comment – Compliance schedule dates may not be feasible**

CDC requested that compliance due dates be extended for several tasks listed in Table 6 of the TSO as follows:

- Task 3, submittal of an updated Notice of Intent, extension from 14 months to 36 months.
- Task 5, completion of an appropriate treatment design or alternative measures for the discharge of extracted groundwater, from 36 months to 48 months.
- Task 6, completion of the final treatment design or alternative measures, from 40 months to 54 months.
- Task 7, commencement of construction of the treatment system or implementation of alternative measures, from 42 months to 60 months.
- Task 8, completion of construction or implementation of alternative measures, from 59 months to 78 months.
- Task 9, achievement of full compliance, from 60 months to 80 months.

##### **Response**

San Diego Water Board staff do not agree with these comments because the TSO is designed to achieve compliance within five years. No changes were made in response to this comment.

### **2. Patti Tarantino and Tom Tarantino (Tarantinos)**

On October 11, 2023, the Tarantinos submitted a comment on the TSO.

#### **2.1. Comment – Percolating groundwater in the Lake San Marcos neighborhood**

The Tarantinos requested guidance on stopping percolating groundwater from impacting the neighborhood.

##### **Response**

After further discussion and clarification from the Tarantinos, the San Diego Water Board determined the comment was not related to the TSO. Therefore, no changes were made to the TSO.

### **3. Staff Initiated Changes**

- 3.1.** The San Diego Water Board corrected minor typographical errors throughout the TSO