



2009 BASIN PLAN TRIENNIAL REVIEW COMMENT SUBMITTAL FORM

Please use this form to submit comments that you would like the San Diego Regional Water Quality Control Board to consider during the Triennial Review of the Water Quality Control Plan of the San Diego Basin (Basin Plan). Of particular interest are comments about water quality standards (e.g., beneficial uses and water quality objectives), but comments about any aspect of the Basin Plan are welcome. Comments submitted through the Triennial Review process provide the public an opportunity to assist the San Diego Regional Water Quality Control Board in identifying issues that need to be addressed through Basin Plan amendments in order to best meet the water quality planning needs of the San Diego Region. For additional information about the Triennial Review process, please see the following website:

http://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/tri_review.shtml

If you have multiple comments (i.e., multiple issues, concerns, suggestions), please submit a separate comment submittal form for each. Completed form(s) may be emailed to RB9_tri_review@waterboards.ca.gov; sent to the attention of Deborah Woodward at the address in the header of this form; or faxed to (858) 571-6972. Please include the words "Triennial Review" in the subject line of your communication. Deadline for submittal is **January 9, 2009 at 5:00 p.m.** Thank you for your participation!

1. CONTACT INFORMATION:

First Name: Sheri		Last Name: McPherson	
Organization Name: San Diego Integrated Regional Water Management (IRWM) Program			
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2. COMMENT TOPIC:

Please specify the topic of your comment. (Please try to limit topic to ten words or less.)

[Develop Region-wide TDS/Nutrient Management Plan for the San Diego County Watersheds](#)

3. COMMENT:

Please provide a detailed description of your issue/concern/suggestion, and explain why it needs to be addressed. (There is no limit to the amount of text for the comment. The space will expand as needed.)

[The San Diego Integrated Regional Water Management \(IRWM\) Program recommends the development of a region-wide Total Dissolved Solid \(TDS\) and Nutrient Management Strategy to address the mounting TDS and nutrient impacts on ground and surface waters, and as a means of better aligning water quality objectives within the County Water Authority distribution region to reflect imported and recycled water contributions. This suggestion directly supports of the comments and submittal previously made through Project Clean Water during the 2003 triennial review of the Basin Plan.](#)

[Prior to 2002, there were no identified TDS impairments and only one waterbody identified as impaired by nutrients on the CWA 303\(d\) list. Since that time, 73 segments have been added to the 303\(d\) for TDS and nutrient constituents. Numerous current practices are adding to this problem, including land use planning decisions and the pattern of residential and commercial development, importing drinking water; agricultural irrigation practices; water recycling, water conservation; and nonpoint source management.](#)

Uses and management strategies for surface waters, groundwaters, imported waters, and recycled waters are not currently aligned. The SWRCB Proposed Recycled Water Policy will require that local entities, together with the local salt/nutrient contributing stakeholders, develop salt and nutrient management plans for groundwater basins/sub-basins throughout the State. This policy will advance TDS and nutrient management efforts in the San Diego region, but does not take into consideration the interactions of local surface and groundwaters, seasonal and climatic factors, local hydrogeological conditions, or the addition of TDS from the importation of potable water from the Colorado River basin.

TDS and nutrient sources will be changing in response to the current drought conditions, loss of State Water Project water due to impacts on the Bay-Delta, and the mandated use of recycled water. Changes in water supply will require the region to explore and utilize other sources of water and to implement aggressive conservation programs. This will increase the rate of impact of TDS and nutrients on surface waters.

At the same time other efforts such as brackish groundwater desalination, advanced treatment and reuse of recycled water, construction of brine lines, seawater desalination, planned groundwater recharge and outdoor irrigation conservation programs can offset these increases in salinity. A comprehensive plan is needed to guide the region in a coordinated, holistic manner in the management of water to meet the long-term needs of the community and to provide the most cost effective beneficial use protection and attainment.

This issue is an identified priority aligned with existing San Diego IRWM Planning efforts. IRWM Plan Objective G (Effectively reduce sources of pollutants and environmental stressors) was established to address region-wide constituents of concern including nutrients and TDS. The Plan identified development of a regional TDS Management Plan as a designated target for achieving Objective G. IRWM participants are the very stakeholders needed to succeed in the development and implementation of a TDS/nutrient management plan. The IRWMP Program would like to partner with the RWQCB to effectively conceptualize this complex issue, develop a holistic management plan, and develop implementation strategies for best management practices to be incorporated into the Basin Plan. Through the participation of the IRWM stakeholders and the public in this process the region can succeed in evaluating the Porter-Cologne 13241 factors.

4. GEOGRAPHIC SCOPE OF COMMENT:

Mark the box (☒) that best corresponds to the geographic scope of your comment:

<input checked="" type="checkbox"/>	Entire San Diego Region	
<input checked="" type="checkbox"/>	Multiple watersheds	<i>If the watersheds and/or waterbodies are known, please specify here:</i>
<input type="checkbox"/>	Single watershed	
<input type="checkbox"/>	Multiple waterbodies	
<input type="checkbox"/>	Single waterbody	
<input type="checkbox"/>	Beach or coastal waters	
<input type="checkbox"/>	Other:	
<input type="checkbox"/>	None of the above (comment is administrative or has no direct geographic scope)	

5. ADDITIONAL INFORMATION ABOUT YOUR COMMENT:

Information about the following items may help us better understand and evaluate your comment. For any that are applicable to your comment, please elaborate in the space provided. Leave blank if item is not applicable or if you are unsure.

- a. **If you think a Basin Plan amendment addressing your comment would likely have widespread stakeholder support, please explain in the space below and, if known, list supportive stakeholder(s) with phone or email contact(s).** *(The space will expand as needed.)*

The IRWM RAC Workgroup on Basin Plan Triennial Review
Mark Weston, Helix Water District, 619-466-0585 mark.weston@helixwater.org
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Toby Roy, San Diego County Water Authority, 858-522-6743 troy@sdca.org
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Rick Alexander, Sweetwater Authority, 619-420-1413 ralexander@sweetwater.org
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- b. **If substantial resources have been invested in developing technical information that would support a Basin Plan amendment addressing your comment, please explain in the space below.** *(The space will expand as needed.)*

In 2003, Project Clean Water prepared An Analysis of Total Dissolved Solids in San Diego County as part of the 303(d) listing process and Basin Plan Triennial Review. This analysis assessed existing TDS data looking at the hydrologic influences of groundwater on surface water quality and dry season streamflows. This analysis also included a summary of the imported water considerations.

In 2006, the Water Authority completed a study on Recycled Water Salinity Management

In 2007, the Regional Water Management Group (City of San Diego, County of San Diego and San Diego County Water Authority) completed an Integrated Regional Water Management Plan.

In June 2008, a Salinity Seminar was conducted by the Southern California Salinity Coalition. This seminar was conducted to raise awareness and engage water and wastewater agencies and stakeholders on salinity issues in the San Diego region. The Salinity Seminar emphasized regional water management planning as a tool in addressing salinity-related challenges. Objectives included: sharing information with stakeholders; reviewing salinity-related needs and issues; and identifying opportunities for collaboration on future projects addressing areas of concern.

- c. **If substantial resources are likely available to augment Regional Board resources needed to develop a Basin Plan amendment addressing your comment, please explain in the space below.** *(The space will expand as needed.)*

The IRWM planning process is available to augment Regional Board resources by serving as a forum for stakeholder outreach, including public workshops to discuss TDS/nutrient conditions, policies, and implementation strategies. In addition, local water, stormwater, and wastewater entities are likely to participate in the development of salt/nutrient management plans for groundwater basins either through committed funding or in-kind services.

6. HOW TO BRING ADDITIONAL INFORMATION TO OUR ATTENTION:

- a. If you would like to direct us to additional information that supports/supplements your comment, e.g., web address, report citation, contact person for follow-up, please give direction in the space below.

(The space will expand as needed.)

Southern California Salinity Coalition Summary of Salinity Seminar for the San Diego Region - Can be found online at www.socalsalinity.org

Salinity Management Guide - Can be found online at www.socalsalinity.org

Proposed Recycled Water Policy and Draft Staff Report - Can be found online at http://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/index.shtml

Statewide General Permit for Landscape Irrigation Uses of Recycled Water - Can be found at http://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/landscape_irrigation_general_permit.shtml

- b. If you are submitting additional information that supports/supplements your comment, e.g., reports, articles, data sets, please tell us what you are sending so that once received we can link it to your comment. *(The space will expand as needed.)*

Note: Supporting information may be emailed to RB9_tri_review@waterboards.ca.gov; sent to the attention of Deborah Woodward at the address in the header of this form; or faxed to (858) 571-6972. Please include the words "Triennial Review" in the subject line of your communication. Email can accommodate files up to approximately 15MB. If you are uncertain how best to submit additional supporting information, please call 858-637-5586.

An Analysis of Total Dissolved Solids in San Diego County - Attached with submittal