Proposal Name: Pure Water Program
Submission Date: 09/19/2016
Proposal ID Number: 82b98835-4244-4117-9d63-2635cc2d90ef

Purpose of Proposal: Project Purpose
The purpose of the study is to gather existing data on the City’s source water and evaluate the effects (advantages and disadvantages) of implementing a reuse source water program.

San Diego adopted a Recycled Water Program initiative which is in the planning phase of evaluating source water to meet potable water demand. The region’s 3.1 million people receives most of their water supply from imported sources, including the California Bay-Delta (State regulated) and the Colorado Rivers (Federal regulated with ecosystem, dams and navigation facilities). Currently, 85 percent of the San Diego region’s water supply is imported from these State and Federal waters with local supplies and conservation account for the remaining 15 percent. Imported source water also causes adverse effects to the source water’s ecosystem, conveyance, storage and navigation facilities. With the region’s population projected to reach 3.9 million people by 2030, demand on the source water will increase proportionally and exacerbate the current adverse effects on these limited source waters.

Of paramount interest to this Section 7001 of WRRDA 2014 Proposal and the US Army Corp of Engineer’s (USACE) Mission, the Program will result in a reduction in demand of source water from regulated State and Federal Waters by 1/3rd of the Utilities average daily flow (ADF). Significant to the USACE overall mission (navigation, flood risk management, and aquatic ecosystem restoration, hydropower and/or water supply), this project will affect each of these items with positive results. As each community/purveyor adopted a progressive reuse water (source water reduction) program similar to that envisioned by the City, the overall National impact will be significant.

The Program involves the planning, design, and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, and pipelines.
1. Administrative Details

Proposal Name: Pure Water Program

by Agency: City of San Diego

Locations: CA

Date Submitted: 09/19/2016

Confirmation Number: 82b98835-4244-4117-9d63-2635cc2d90ef

Supporting Documents

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<thead>
<tr>
<th>File Name</th>
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<tr>
<td>USACE Applic-Pure Water-Letters of Support (ALL).pdf</td>
<td>09/19/2016</td>
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<tr>
<td>Project Elements &amp; Source Water Maps.pdf</td>
<td>09/19/2016</td>
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</tbody>
</table>
2. Provide the name of the primary sponsor and all non-Federal interests that have contributed or are expected to contribute toward the non-Federal share of the proposed feasibility study or modification.

<table>
<thead>
<tr>
<th>Sponsor</th>
<th>Letter of Support</th>
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<tbody>
<tr>
<td>City of San Diego, and the potential for State of California, State Revolving Fund (SRF) (Primary)</td>
<td>The City of San Diego and the City’s Water Utility Customer Base of 3.1 million residents supports the Pure Water Program. The Program is planned to support citizens of San Diego and surrounding communities by providing a clean, safe, secure, reliable and sustainable local drinking water supply for San Diego. The Program includes an indirect affect that will improve regulated state and federal waters. This is accomplished by reducing the amount of water withdrawn from regulated State and Federal waters by 1/3rd of the City’s Water Utilities average daily flow (ADF)</td>
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3. State if this proposal is for a feasibility study, a modification to an authorized USACE feasibility study or a modification to an authorized USACE project. If it is a proposal for a modification, provide the authorized water resources development feasibility study or project name.

[x] Feasibility Study
4. **Clearly articulate the specific project purpose(s) of the proposed study or modification. Demonstrate that the proposal is related to USACE mission and authorities and specifically address why additional or new authorization is needed.**

Project Purpose The purpose of the study is to gather existing data on the City’s source water and evaluate the effects (advantages and disadvantages) of implementing a reuse source water program.

San Diego adopted a Recycled Water Program initiative which is in the planning phase of evaluating source water to meet potable water demand. The region’s 3.1 million people receive most of their water supply from imported sources, including the California Bay-Delta (State regulated) and the Colorado Rivers (Federal regulated with ecosystem, dams and navigation facilities). Currently, 85 percent of the San Diego region’s water supply is imported from these State and Federal waters with local supplies and conservation accounting for the remaining 15 percent. Imported source water also causes adverse effects to the source water’s ecosystem, conveyance, storage and navigation facilities. With the region’s population projected to reach 3.9 million people by 2030, demand on the source water will increase proportionally and exacerbate the current adverse effects on these limited source waters.

Of paramount interest to this Section 7001 of WRRDA 2014 Proposal and the US Army Corp of Engineer’s (USACE) Mission, the Program will result in a reduction in demand of source water from regulated State and Federal Waters by 1/3rd of the Utilities average daily flow (ADF). Significant to the USACE overall mission (navigation, flood risk management, and aquatic ecosystem restoration, hydropower and/or water supply), this project will affect each of these items with positive results. As each community/ purveyor adopted a progressive reuse water (source water reduction) program similar to that envisioned by the City, the overall National impact will be significant.

The Program involves the planning, design, and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, and pipelines.
5. To the extent practicable, provide an estimate of the total cost, and the Federal and non-Federal share of those costs, of the proposed study and, separately, an estimate of the cost of construction or modification.

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<th>Federal</th>
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Explanation (if necessary)

Water reuse programs provide valuable water supplies by using resources that otherwise are sent to the ocean. The decisions to invest in a water reuse program, or alternative large-scale wastewater system upgrades, will affect the National and Regional assets (ecosystem, storage, navigation, etc.) for decades. The fundamental focus of this study was to develop water reuse alternatives and then weigh the alternatives against other options – with particular focus on the water supply benefits. A preliminary construction cost estimate of the reuse elements of this project is estimated at $3.2 billion. The Feasibility Study is estimated to cost $5M for all associated activities. The Federal and non-Federal share of these costs will meet the need.
6. To the extent practicable, describe the anticipated monetary and nonmonetary benefits of the proposal including benefits to the protection of human life and property; improvement to transportation; the national economy; the environment; or the national security interests of the United States.

San Diego (City) and its regional partners face significant issues with water supply and wastewater treatment. Currently eighty five percent (85%) of the region’s water supply is imported from regulated State and Federal waters across the State of California (Colorado River and Northern California Bay Delta). The region’s reliance on imported water is ever increasing with growth.

The Pure Water (Program) is a progressive alternative water resource/source water conservation plan with numerous long term benefits that address the above noted issues. The Program involves the production of potable recycled water through the design and construction of new advanced water purification. Local, Regional and National benefits include:

Environmental: improved wastewater discharge (deep ocean outfall) quality through the implementation of advance waste treatment plants. Effect a 50% reduction in the current volume of ocean discharges by maximizing the amount of water the City reuses.; reduction in source water demand and dependency by utilizing reuse water to a level of 30% of the average daily flow (ADF). Restore 1/3rd of the City’s ADF volume within in State and Federal waters. This directly effects water quality and quantity within waterways, in a positive way. Reuse can also improve the ocean water quality by reducing volume and salinity levels.

Financial: Federal impact is directly related to the cost of managing the various effects of reduced water within regulated Federal waters. San Diego is one of the top 10 cities in the country for job growth through 2025. San Diego’s Economic Base related to Federal Industry includes: • U.S. Navy • U.S. Marine Corps • Defense & Security Systems • Biotech & Medical Devices • Electronics & Telecommunications.

Reliability: water will be produced and controlled locally which increases the volume of water to remain in Federal waters thereby ensuring a more reliable volume of natural water remain within waterway
7. Does local support exist? If ‘Yes’, describe the local support for the proposal.

[x] Yes

Local Support Description

The City Council has addressed the Proposal in numerous Public Council Meetings, for example, the City Council has addressed and/or voted on the subject numerous times in the past: 1) Resolution Number R-303095 of the City Council accepting the 2006 Water Reuse Study, adopted December 2, 2007, etc. The citizens of San Diego continue to participate and support this project and include the following groups: Environmental Groups San Diego Coastkeeper, Surfrider Foundation, San Diego Chapter Oversight Groups Independent Rates Oversight Committee (IROC), Regional Water Supplies San Diego County Water Authority (SDCWA) Participating Agency Members City of Chula Vista, City of Coronado, City of Del Mar, City of El Cajon, City of Imperial Beach, City of La Mesa, City of National City, City of Poway, Lemon Grove Sanitation District, Otay Water District, Padre Dam Municipal Water District, San Diego County Sanitation District, Alpine Sanitation District, Lakeside Sanitation District, Spring Valley Sanitation District, Winter Gardens Sewer Maintenance District.

8. Does the primary sponsor named in (2.) above have the financial ability to provide for the required cost share?

[x] Yes
Primary Sponsor Letter of Support

(As uploaded)
USACE Applic\_Pure Water-Letters of Support (ALL).pdf
<table>
<thead>
<tr>
<th>Pure Water San Diego Supporters</th>
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<tr>
<td>Asian Business Association</td>
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<tr>
<td>Asian Pacific American Coalition</td>
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<td>BIOCOM</td>
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<tr>
<td>Building Industry Association of San Diego County</td>
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<tr>
<td>California Restaurant Association, San Diego County chapter</td>
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<td>City of Imperial Beach</td>
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<td>CONNECT</td>
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<td>Equinox Center</td>
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<td>Great Skyline Hills Community Association</td>
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<td>Groundwork San Diego</td>
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<td>Industrial Environmental Association</td>
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<td>San Diego Regional Economic Development Corporation</td>
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<td>San Diego River Park Foundation</td>
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<td>Southeastern San Diego Planning Group</td>
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<td>St. Stephens Cathedral Church of God Christian Ministries</td>
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<td>Surfrider Foundation, San Diego County Chapter</td>
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<td>WateReuse Association, San Diego Chapter</td>
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<tr>
<td>Agreement with Bureau of Reclamation, Dept. of the Interior</td>
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_Letters of support provided in Attachment A_
Pure Water San Diego

Letters of Support
Attachment A
July 27, 2015

John Helminski  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123  

Dear Mr. Helminski:

The Asian Business Association of San Diego (ABASD) supports the Pure Water San Diego program, which will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. We have had the opportunity to learn about the science of the water purification process and we understand that purified water will meet all federal and state drinking water standards.

ABASD believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides a drought-proof water supply, helps reduce ocean pollution, and makes San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Robert P. Ito  
Chair
January 11, 2016

John Helminski
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Mr. Helminski:

The Asian Pacific American coalition (APAC) supports the Pure Water San Diego program, which will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. We have had the opportunity to learn about the science of the water purification process and we understand that purified water will meet all federal and state drinking water standards.

Our organization believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides a drought-proof water supply, helps reduce ocean pollution, and makes San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Michael Wong
Chairman
Asian Pacific American coalition
October 8, 2014

Halla Razak  
Director of Public Utilities  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Ms. Razak:

I am writing to express Biocom’s support for Pure Water San Diego when it comes before the San Diego City Council on October 28, 2014. Pure Water San Diego will provide San Diego with a more diversified and sustainable local supply of drinking water.

Biocom is the largest regional life science association in the world, representing over 600 member companies in Southern California. Our organization was founded almost 20 years ago on the issue of access to water. Our member companies depend on a reliable, constant source of water for everyday business activities; interruption of these supplies could mean millions of dollars lost in delicate research. Biocom has been a longtime supporter of diversification of the region’s water supply, including indirect (and, if viable, direct) potable reuse as a logical alternative to water importation.

It is Biocom’s hope that Pure Water San Diego will provide a long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water.

Biocom supports the City of San Diego moving forward with the Pure Water San Diego program as proposed in the item before Council. We thank the City of San Diego for its efforts to pursue a viable new water supply for San Diego.

Sincerely,

Joe Panetta  
President & CEO  
Biocom
February 22, 2016

John Helminski  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Mr. Helminski:

The San Diego Building Industry Association represents 700 companies with over 65,000 employees in the San Diego region. Ensuring a reliable supply of water is a critical component of our ability to continue building the homes and businesses where San Diegans can live, work, and play.

The City of San Diego’s, Pure Water San Diego program, will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. We have had the opportunity to learn about the science of the water purification process and we understand that purified water will meet all federal and state drinking water standards.

The BIA believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides a drought-proof water supply while helping reduce ocean pollution, and makes San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Borre Winckel  
President and CEO  
BIA San Diego

Building Industry Association of San Diego County  
9201 Spectrum Center Blvd., Suite 110, San Diego, CA 92123-1407  
P 858-450-1221  F 858-552-1445  www.biasandiego.org
November 14, 2014

Ann Sasaki  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Ms. Sasaki:

The California Restaurant Association, San Diego County Chapter is in full support of the Pure Water San Diego Program. The San Diego County Chapter has examined the technology and participated in numerous public hearings regarding the Pure Water San Diego. We applaud the City of San Diego Public Utilities Department and the community for their public outreach efforts and addressing the need for a new locally controlled, drought-proof water supply. We believe that the purified water will meet all federal and state drinking water standards, providing San Diego residents with a safe, sustainable local supply of drought-proof drinking water.

Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water.

Thank you for continuing to move forward and pursue a viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Chris Duggan  
Director, Government Affairs  
California Restaurant Association
October 13, 2014

Mayor Kevin Faulconer  
202 C Street, 11th Floor  
San Diego, CA 92101

Dear Mayor Faulconer,

I wanted to take a moment to thank you and the staff of the City of San Diego Public Utilities Department for addressing the concerns of Imperial Beach in relation to the permit to operate the Point Loma Wastewater Treatment Plant. I am pleased to inform you that the Imperial Beach City Council has adopted a resolution of support for the permit application and the Pure Water initiative. Once again, the positive relationship between our communities has allowed us to resolve a critical issue in a manner that will benefit all parties involved.

On behalf of the Imperial Beach City Council, I would like to let you know we are grateful for the long standing partnership between our respective communities and thank you for your leadership as we deliberated and studied this important matter. The willingness of the City of San Diego to provide enhanced monitoring of our water quality, in addition to every effort to keep the price of water reasonable, is very much appreciated. Perhaps most importantly was how much you and your staff made us feel informed and supported while the application was developed and various scenarios were being considered. I hope you will have an opportunity to pass along our gratitude to your staff for their efforts.

If there is anything the City of Imperial Beach, or I as a neighboring Mayor, can do to assist you, please do not hesitate to ask. Together, we are making the south portion of the County an even better place to invest, work and live.

Sincerely,

Jim Janney  
Imperial Beach Mayor
RESOLUTION NO. 2014-7514

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF IMPERIAL BEACH, SUPPORTING THE SAN DIEGO PURE WATER PROGRAM AND SECONDARY EQUIVALENCY FOR POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240 million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint Powers Authority that comprises approximately 35% of the total flow in the Metro Wastewater System/PLWTP; and

WHEREAS, the City of Imperial Beach is one of the 12 members of the above mentioned Metro Wastewater Joint Powers Authority; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve certain protections before ocean discharge and the permitting of wastewater treatment plants, and wastewater treatment plant permits must be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San Diego to apply for modified permits allowing PLWTP to continue operating at an Advanced Primary Treatment Level while meeting or exceeding all general and specifically negotiated regulatory obligations including ocean protection requirements; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and City of San Diego staff must finalize a strategy and begin the extensive work required to secure the next permit in or around January 2014; and

WHEREAS, in order to secure "non-opposition" for modified permits from environmental stakeholders, the City of San Diego agreed to and successfully prepared verifiable estimates of the cost to convert the current 240 million gallon per day (mgd) PLWTP to Secondary Treatment Levels, conducted a comprehensive external scientific review of ocean monitoring implementing all recommendations for an enhanced ocean monitoring program, and built 45 mgd of water reclamation capacity in the form of the North City Water Reclamation Plant and the South Bay Water Reclamation Plant; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego has successfully completed a 1 mgd Advanced Water Purification Demonstration Project producing water that is far superior in quality to raw water currently delivered to local reservoirs, and produces potable water of a quality similar to distilled water; and

WHEREAS, the City of San Diego has determined that instead of converting the Point Loma Wastewater Treatment Plant to a secondary treatment plant, equivalent results can be achieved by offloading wastewater flow from the Plant to other existing and new facilities (secondary equivalency) for potable water reuse; and

WHEREAS, the City of San Diego's survey indicates that percentages of those favoring Advanced Treated recycled water as an addition to the drinking water supply have increased from 36% in 2004 to 73% in 2012; and
WHEREAS, the San Diego region forecasts the need for billions of dollars in ratepayer revenue to fund imported water supply projects to address transportation constraints and supply challenges, including a locally owned Colorado River pipeline and plans for at least three ocean desalination plants, all of which will require significant capital, operating and energy expenditures; and

WHEREAS, the Metro Commission sees the Pure Water Program, the City of San Diego’s 20-year program to produce purified water to supplement San Diego’s drinking water supply, as a first step toward realizing the possibility of fully utilizing wastewater supplies to maximize development of local water supply acknowledging that future expansion and ability to minimize flows to wastewater treatment plants will depend on technological and legislative advances, cost benefit analysis, and actual flows compared to projections; and

WHEREAS, the Pure Water Program will avoid billions of dollars in unnecessary capital, financing, energy and operating costs to upgrade a facility that already meets or exceeds all general and specifically negotiated regulatory requirements for ocean protection; and

WHEREAS, the City of San Diego, member agencies of the Metro Wastewater JPA, members of the Metro Commission, and stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II) to allow PLWTP to remain operating at the Advanced Primary Treatment Level that includes a commitment to the San Diego Pure Water Program; and

WHEREAS, the City of San Diego is not including in its permit application materials for PLWTP any expressed or implied proposal to divert wastewater to a South Bay plant for treatment and discharge through the South Bay Ocean Outfall.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Imperial Beach, as follows:

Section 1: The City of Imperial Beach supports development of Pure Water Program that includes the most cost effective water reuse options for potable reuse within the Metro Wastewater System that will maximize the beneficial use of recycled water as a new local water supply without the need for additional wastewater treatment that will discharge secondary treated effluent from the South Bay Ocean Outfall. To accomplish these goals, the support from the City of Imperial Beach is contingent on commitments included in correspondence from the City of San Diego on May 13, 2014, to include:

A. All studies related to the review of the maximum potable water reuse capacity for reservoir augmentation at the San Vicente and Otay Reservoirs will be shared and discussed with the City of Imperial Beach.
B. All planning studies related to the City of San Diego proposed facilities plan will be shared and discussed with the City of Imperial Beach.
C. The City of San Diego will review and update the existing studies for the South Bay Ocean Outfall to validate or correct the original assumptions and criteria concerning marine and shoreline impacts up to full discharge. The City of San Diego will update the 2009 South Bay Ocean Outfall plume study to identify the impacts of the current flow and to model projected future flows up to maximum outfall permitted capacity. Furthermore, real time ocean current moorings will be installed and in operation no later than July 1, 2015.
D. The City of San Diego will make available all ocean monitoring data to the City of Imperial Beach for review and inspection.
E. The City of San Diego will organize a Rapid Response Team to address concerns of odors, visual pollution, water sampling and other potential events in need of immediate action.

Section 2: That the City of Imperial Beach supports developing the Pure Water Program with the goal of realizing a smaller secondary equivalent PLWTP to avoid spending billions of dollars in ratepayer monies for an unnecessary upgrade to Secondary Treatment, instead potentially funding the creation of new water supplies, including potable water reuse.

Section 3: That the City of Imperial Beach supports the Pure Water Program to maximize opportunities to create new, local sustainable water supplies thereby creating opportunities to avoid or downsize billions of dollars in future water supply projects.

Section 4: That the City of Imperial Beach supports the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and supports proposing the passage of federal legislation that would allow the City's NPDES permit to be based on secondary equivalency and includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level.

Section 5: That the City of Imperial Beach supports the proposed NPDES Modified Permit application for the PLWTP to continue operation at Advanced Primary Level.

PASSED, APPROVED, AND ADOPTED by the City Council of the City of Imperial Beach at its meeting held on the 1st day of October 2014, by the following vote:

AYES: COUNCILMEMBERS: BRAGG, SPRIGGS, BILBRAY, PATTON, JANNEY
NOES: COUNCILMEMBERS: NONE
ABSENT: COUNCILMEMBERS: NONE

ATTEST:

JACQUELINE M. HALD, CMC
CITY CLERK

JAMES C. JANNEY, MAYOR
September 29, 2014

Ann Sasaki
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Ms. Sasaki:

As a leading voice for tech start-up and emerging companies in San Diego’s Innovation Economy, CONNECT would like to voice our support for the Pure Water San Diego program that will provide San Diego with a safe, sustainable local supply of drought-proof drinking water and help to permanently resolve the Point Loma Wastewater Treatment Plant’s need for a modified permit. We have had the opportunity to learn about the science of Pure Water San Diego, so we understand that purified water will meet all federal and state drinking water standards.

San Diego needs to have a reliable and secure water supply which is paramount if new companies are to continue to choose San Diego as the place to start &/or grow their businesses. CONNECT believes Pure Water San Diego is an innovative approach and an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water. As an added benefit, it helps reduce ocean pollution and save ratepayers expensive upgrades to the Point Loma Wastewater Treatment Plant.

Thank you for continuing to move forward and pursue a viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Greg McKee
CEO
CONNECT
24th November 2015

John Helminski
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Mr. Helminski:

CPKelco and I support the Pure Water San Diego program, which will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. I have had the opportunity to learn about the science of the water purification process and I understand that purified water will meet all federal and state drinking water standards.

CPKelco and I believe Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides a drought-proof water supply, helps reduce ocean pollution, and makes San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

John Breese
Plant Manager - San Diego
Equinox Center Endorses City of San Diego's Pure Water Project

*Pure Water San Diego will be environmentally and economically beneficial to the City of San Diego*

SAN DIEGO (September 22, 2014)---**Equinox Center’s** Board of Directors has unanimously voted to endorse the City of San Diego’s Pure Water Project.

“The Pure Water San Diego Project will positively impact our environment, our economy and our communities,” said Ray Ellis, Equinox Center’s Board Chair. “Equinox is in complete agreement that this plan is one of the most beneficial solutions to the City’s long-term water supply needs.”

Pure Water San Diego is a 20-year plan that will create a safe and reliable water supply by recycling what is here already.

According to the City of San Diego’s Public Utilities Department, Pure Water San Diego will provide a safe and more secure water future thanks to local water control, is more economical, and provides environmental benefits. When fully implemented, demand projections show Pure Water San Diego can provide a third of the City’s water supply by 2050.

The City of San Diego currently relies on the Colorado River and the Bay Delta for 85 percent of its water supply. This is problematic in many ways, including the fact that it puts San Diego at an environmental and economic disadvantage.

In the last decade, the cost of importing water has more than doubled, and imported water costs are expected to continue to increase. Conversely, the City of San Diego estimates Pure Water San Diego is expected to save hundreds of millions of dollars by 2035 if San Diego can locally purify water, rather than relying on the ever-increasing cost of importing from Northern California and the Colorado River.

Pure Water San Diego includes the implementation of a full-scale water purification plant and continued water conservation efforts, creating a constant, reliable water source and minimizing the amount of highly-treated wastewater entering the Pacific Ocean.

“This is important work the City is doing, and what's most impressive about it is the positive impact it will have on our region’s quality of life,” said Stephen Heverly, Equinox Center’s Managing Director. “Creating a safe, reliable, sustainable and locally-controlled water supply will help position our region for future success on several fronts.”

**Contact:** Tony Manolatos | 619.549.0137 | amanolatos@gmail.com

*About Equinox Center:* Equinox is a nonprofit, non-partisan, independent regional research group that advances innovative solutions to balance regional growth with our finite natural resources. Our mission is to ensure a healthy environment, strong economy and civic engagement for the San Diego region. Equinox Center turns research into action to help the San Diego region achieve a more prosperous economy, healthy environment and outstanding quality of life for all its residents as it grows. To learn more, visit [www.equinoxcenter.org](http://www.equinoxcenter.org). Connect with **Equinox Center on Facebook** and follow us on Twitter [@equinoxcenter](http://twitter.com/equinoxcenter).
April 8, 2016

John Helminski  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Mr. Helminski:

The Greater Skyline Hills Community Association support the Pure Water San Diego Program, which will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. We have had the opportunity to learn about the science of the water purification process and we understand that purified water will meet all federal and state drinking water standards.

Our organization believe Pure Water San Diego is an excellent long-term solution for addressing the City's water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides drought-proof water supply, helps reduce ocean pollution, and make San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active resource planning.

Sincerely,

Cathy Ramsey, et al
October 23, 2015

John Helminski  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Mr. Helminski:

Groundwork San Diego-Chollas Creek Board of Directors supports the Pure Water San Diego program, which will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. We have had a presentation about the science of the water purification process and understand that purified water will meet all federal and state drinking water standards.

The Groundwork Board believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides a drought-proof water supply, helps reduce ocean pollution, and makes San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Derryl Williams  
President
September 25, 2014

Ann Sasaki  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Ms. Sasaki:

The Industrial Environmental Association (IEA) of San Diego supports the Pure Water San Diego program that will provide San Diego with a safe, sustainable local supply of drought-proof drinking water and help to permanently resolve the Point Loma Wastewater Treatment Plant’s need for a modified permit. We have had the opportunity to learn about the science of Pure Water San Diego, so we understand that purified water will meet all federal and state drinking water standards.

IEA believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water. As an added benefit, it helps reduce ocean pollution and save ratepayers expensive upgrades to the Point Loma Wastewater Treatment Plant.

Thank you for continuing to move forward and pursue a viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Jack Monger  
Executive Director
October 27, 2014

The Honorable Kevin Faulconer  
City of San Diego  
202 C Street, #11  
San Diego, CA 92101

Re: Metro Wastewater JPA/Metro Commission Letter of Support for the Point Loma Wastewater Treatment Plant Modified NPDES Permit Renewal

Dear Mayor Faulconer,

The Metro Wastewater JPA/Metro Commission appreciates the collaborative approach with the city of San Diego regarding the latest NPDES modified permit application process for the Point Loma Wastewater Treatment Plant (PLWTP).

Despite over 20 years of ocean monitoring data that demonstrate that Point Loma is doing no harm to the environment, the uncertainties of continued modified permit applications, rate payer impacts and infrastructure planning demanded a more comprehensive approach. The City of San Diego, the Metro Wastewater JPA/Metro Commission and key environmental community stakeholders agreed on a strategy that encompasses several elements.

The Metro Wastewater JPA/Metro Commission:

1. Desires that the Point Loma Wastewater Treatment Plant remain in operation at an Advanced Primary Treatment Level;

2. Supports the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and desires the passage of federal legislation in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II). Generally, OPRA II will allow the City’s NPDES permit to be based on secondary equivalency with a commitment to implement potable reuse of wastewater and allow the PLWTP to remain operating at the Advanced Primary Treatment Level; and

3. Supports the City of San Diego’s NPDES Modified Permit application for the Point Loma Wastewater Treatment Plant as further described in the attached Basis of Point Loma Permit Application.

More important steps are needed in addition to these in order to insure the success of the approach that we have chosen to take regarding the permit renewal and related infrastructure improvements. Continued stakeholder collaborative participation will be essential for us to succeed.
The JPA/Commission applauds the City of San Diego for its leadership in taking a comprehensive approach to provide sustainable infrastructure stability for the San Diego region’s wastewater and water needs into the future.

Respectfully,

Cheryl Cox
Mayor, City of Chula Vista
Chair, Metro Wastewater JPA

Cc: San Diego City Clerk
RESOLUTION NO. 2014-181

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CHULA VISTA SUPPORTING SAN DIEGO'S NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MODIFIED PERMIT FOR THE POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240 million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint Powers Authority that comprises approximately 35% of the total flow in the Metro Wastewater System/PLWTP; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve certain protections before ocean discharge, that wastewater treatment plants be permitted, and that wastewater treatment plant permits be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San Diego to apply for modified NPDES permits allowing PLWTP to continue operating at an Advanced Primary Treatment Level while meeting or exceeding all general and specifically negotiated regulatory obligations including ocean protection requirements; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego has determined that instead of converting the Point Loma Wastewater Treatment Plant to a secondary treatment plant, equivalent results can be achieved by offloading wastewater flow from the Plant to other existing and new facilities (secondary equivalency) for potable water reuse; and

WHEREAS, the Metro Commission sees the Pure Water Program, the City of San Diego’s 20-year program to produce purified water to supplement San Diego’s drinking water supply, as a first step toward realizing the possibility of fully utilizing wastewater supplies to maximize development of local water supply while acknowledging that future expansion and ability to minimize flows to wastewater treatment plants will depend on technological and legislative advances, cost benefit analysis, and actual flows compared to projections; and

WHEREAS, the strategy of achieving secondary equivalency at the Point Loma Wastewater Treatment Plant through potable reuse of wastewater is included within the Pure Water San Diego program; and
WHEREAS, the City of San Diego, the member agencies of Metro Wastewater JPA, members of the Metro Commission, and stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II). Generally, OPRA II will allow the City’s NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and City of San Diego staff need to submit an application to renew the NPDES permit by January 30, 2015.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Chula Vista as follows:

Section 1: That the Metro Wastewater JPA and Metro Commission support the Point Loma Wastewater Treatment Plant to remain operating at an Advanced Primary Treatment Level.

Section 2: That Metro Wastewater JPA and Metro Commission support the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and support proposing the passage of federal legislation in accordance with the proposal titled the “Ocean Pollution Reduction Act II (OPRA II),” attached hereto as Exhibit “A” and incorporated herein. OPRA II will allow the City’s NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level.

Section 3: That Metro Wastewater JPA and Metro Commission support the City of San Diego’s NPDES Modified Permit application for the Point Loma Wastewater Treatment Plant as further described in the Basis of Point Loma Permit Application, attached hereto as Exhibit “B” and incorporated herein.

Presented by

Approved as to form by

Richard A. Hopkins
Director of Public Works

Glen R. Googins
City Attorney
PASSED, APPROVED, and ADOPTED by the City Council of the City of Chula Vista, California, this 23rd day of September 2014 by the following vote:

AYES: Councilmembers: Aguilar, Bensoussan, Ramirez, Salas and Cox

NAYS: Councilmembers: None

ABSENT: Councilmembers: None

ATTEST:

Cheryl Cox, Mayor

Donna R. Norris, CMC, City Clerk

STATE OF CALIFORNIA  
COUNTY OF SAN DIEGO  
CITY OF CHULA VISTA  

I, Donna R. Norris, City Clerk of Chula Vista, California, do hereby certify that the foregoing Resolution No. 2014-181 was duly passed, approved, and adopted by the City Council at a regular meeting of the Chula Vista City Council held on the 23rd day of September 2014.

Executed this 23rd day of September 2014.

Donna R. Norris, CMC, City Clerk
OCEAN POLLUTION REDUCTION ACT II

SECTION 1. SHORT TITLE.

This Act may be cited as the "Ocean Pollution Reduction Act II."

SECTION 2. FINDINGS AND POLICY

In 1972, Congress passed the Federal Water Pollution Control Act Amendments, which required Publicly Owned Treatment Works to achieve secondary treatment capability by 1977.

In 1994, the Federal District Court for the Southern District of California determined that upgrading the City of San Diego's Point Loma Wastewater Treatment Plant to secondary treatment level would not be in the public interest, being excessively costly without producing additional environmental benefits.

The Point Loma Plant currently meets all the requirements of secondary treatment except for the removal of total suspended solids and biological oxygen demand.

At the direction of Congress, the Environmental Protection Agency (EPA) requested that the National Research Council advise the agency on ways to improve wastewater management in coastal urban areas. The resulting study, "Managing Wastewater in Coastal Urban Areas," produced several important findings, including:

- Biological oxygen demand discharged through a well-designed outfall is generally of no ecological concern in open coastal waters.
- Total suspended solids can be accurately controlled by advanced primary treatment and high-efficiency outfalls.
- Over-control is particularly likely along ocean coasts, but nevertheless full secondary treatment is required regardless of cost or lack of benefits.

Past reviews by the City, the EPA, the State of California, and scientists affiliated with the Scripps Institution of Oceanography and the University of California at San Diego, as well as other organizations have concluded the Point Loma Plant does not have a significant adverse impact on the ocean environment.

The ocean outfall for the Point Loma Plant discharges effluent 4.5 miles from the coast at a depth of over 300 feet, one of the longest and deepest in the world.

Implementing full secondary treatment at the Point Loma Plant will cost approximately $2.1 billion.
Implementing full secondary treatment is contrary to the national interest, in that it will compromise views from the Cabrillo National Monument and interfere with the Navy's use of adjacent property.

The City generates all the energy it needs to operate the Point Loma Plant onsite through co-generation. Implementing full secondary treatment will turn a "green" facility into one of the region's largest energy consumers, requiring the purchase of over $17 million each year in electricity and producing more than 100,000 tons of greenhouse gas emissions annually.

Implementing full secondary treatment at the Point Loma Plant will require removal of 1,250,000 tons of earth from environmentally sensitive habitat immediately adjacent to the Point Loma Ecological Reserve.

Recognizing the unique situation surrounding the Point Loma Plant, Congress adopted the Ocean Pollution Reduction Act of 1994 (OPRA). OPRA allowed the Point Loma Plant to avoid conversion to full secondary treatment and instead operate under a modified permit according to standards contained in OPRA and section 301(b) of the Clean Water Act.

The City has complied with all requirements of OPRA and the results have been significant, including reduction in the discharge of total suspended solids and biological oxygen demand, advanced ocean monitoring, and construction of 45 million gallons per day of reclaimed water capacity at a cost of approximately $70 million.

Successor legislation to OPRA will capitalize on the record of improvements initiated under OPRA and provide a framework for further enhancements to the City's water and wastewater systems, increased potable water reliability, and additional meaningful environmental protection.

The City has completed its Water Purification Demonstration Project showing that municipal wastewater can successfully be treated to levels suitable for potable reuse. The City completed its Recycled Water Study in 2012 describing how wastewater can be diverted from the Point Loma Plant to new treatment facilities to generate water suitable for potable reuse. Through the construction and operation of new treatment facilities, the City can reduce the total suspended solids discharged by the Point Loma Plant to the same or lower levels as would be achieved by implementing full secondary treatment, while creating an important new local source of water.

The City currently relies on imported water for over 85% of its water supply. A new local source of water can significantly reduce the environmental impacts of importing water to San Diego from the Colorado River and the California Bay-Delta by offsetting the City's demand for imported water.

Due to severe drought in California, the 2014 water allocation from the State Water Project is only 5% of normal, forcing water agencies to draw down water reserves, implement mandatory conservation measures, and search for new, dependable sources of water.

OPRA II Legislation
Exhibit A
SECTION 3. SAN DIEGO SECONDARY TREATMENT EQUIVALENCY.

Section 301(j)(5) of the Federal Water Pollution Control Act (33 U.S.C. 1311(j)(5)) is amended to read as follows:

(5) SAN DIEGO SECONDARY TREATMENT EQUIVALENCY.

(A) IN GENERAL. Notwithstanding anything to the contrary in the Federal Water Pollution Control Act or the Coastal Zone Management Act, an application for the Point Loma Wastewater Treatment Plant shall be reviewed and processed as the equivalent of an application for a secondary treatment discharge pursuant to subsection (b)(1)(B) and section 402 of the Federal Water Pollution Control Act; provided, that the application includes a commitment to:

(i) maintain a deep ocean outfall from the Point Loma Wastewater Treatment Plant with a discharge depth of no less than 300 feet.

(ii) discharge no more than 12,000 metric tons of total suspended solids per year commencing on December 31, 2015, no more than 11,500 metric tons of total suspended solids per year commencing on December 31, 2025, and no more than 9,942 metric tons of total suspended solids per year commencing on December 31, 2027.

(iii) discharge no more than a concentration of 0 milligrams per liter of total suspended solids, calculated as a thirty day average.

(iv) remove no less than 80% of total suspended solids on a monthly average, and no less than 80% of biological oxygen demand on an annual average, from wastewater flow tributary to the Point Loma Plant. Wastewater flow is tributary to the Point Loma Plant if it is discharged into the applicant's wastewater system, or into any wastewater system connected to the applicant's wastewater system, excluding wastewater flow treated and discharged from facilities separately permitted under section 402.

(v) meet all other effluent limitations of secondary treatment, as defined by the Administrator pursuant to section 304(d)(1), except for any effluent concentration limits on biological oxygen demand.

(vi) comply with federal anti-degradation policy as determined by the Administrator.

(vii) perform ocean monitoring that meets or exceeds the Administrator's requirements for section 301(h) dischargers.

(B) POTABLE REUSE. To be eligible to submit an application under this paragraph, the applicant must demonstrate to the satisfaction of the Administrator that to the extent
potable reuse is permitted by federal and state regulatory agencies, at least 83 million gallons per day of water suitable for potable reuse on an annual average will be produced by December 31, 2035, from wastewater in the applicant's wastewater system and wastewater systems connected to the applicant's wastewater system as of the date of this Act. The Administrator shall determine development milestones necessary to ensure compliance with this paragraph and include said milestones as conditions in each permit issued prior to December 31, 2035.

(C) PREVIOUS OCEAN MONITORING DATA. The applicant must demonstrate to the satisfaction of the Administrator that the applicant has performed monitoring that meets or exceeds the requirements for section 301(h) discharges for at least the last 10 years.

(D) PENDING APPLICATIONS. Any application for the Point Loma Wastewater Treatment Plant pending on the effective date of this Act shall be reviewed and processed under this paragraph.

(E) SECONDARY TREATMENT. Nothing in this Act shall prevent the applicant from submitting an application for the Point Loma Wastewater Treatment Plant that complies with secondary treatment pursuant to subsection (b) (4) (B) and section 402.
Exhibit B

September 11, 2014

Summary of the Basis of the Application for the
Point Loma Wastewater Treatment Plant
2015 NPDES Modified Permit Renewal

The application will be based on:

a. Compliance with CWA section 301(h) requirements for waivers. (required)
b. Compliance with CWA section 301(f) requirements (Ocean Pollution Reduction Act). (required)
c. Point Loma will remain as an Advanced Primary Treatment Plant with a capacity of 240 mgd.
d. It will also contain specific provisions voluntarily included to enhance the application: These include the following provisions that would be included in the final modified NPDES permit as program goals, as well as some enforceable permit requirements.
e. The goals related to water produced will be calculated based on wastewater in the applicant’s wastewater system and wastewater systems connected to the applicant’s wastewater system:

<table>
<thead>
<tr>
<th>Task</th>
<th>New Permit Enforceable Provisions</th>
<th>Date (Not later than)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cap total suspended solids mass emission at 12,000 metric tons/year</td>
<td></td>
<td>December 31, 2015</td>
</tr>
<tr>
<td>Issue Notice of Preparation for a programmatic EIR</td>
<td></td>
<td>January 31, 2015</td>
</tr>
<tr>
<td>Publish draft programmatic EIR for public review</td>
<td></td>
<td>January 31, 2017</td>
</tr>
<tr>
<td>Issue NTP for final design of 15 mgd pipeline from NCWRP to San Vincente Reservoir</td>
<td></td>
<td>January 31, 2017</td>
</tr>
<tr>
<td>Issue NTP for final design of 15 mgd NCWRP potable reuse</td>
<td></td>
<td>May 31, 2017</td>
</tr>
<tr>
<td>Certify final programmatic EIR</td>
<td></td>
<td>January 31, 2018</td>
</tr>
<tr>
<td>Complete design of 15 mgd pipeline from NCWRP to San Vincente Reservoir</td>
<td></td>
<td>October 31, 2019</td>
</tr>
<tr>
<td>Complete design of 15 mgd NCWRP potable reuse</td>
<td></td>
<td>January 31, 2020</td>
</tr>
</tbody>
</table>

Goals subject to approval of OPRA II legislation:

<table>
<thead>
<tr>
<th>Task</th>
<th>Date (Not later than)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Produce at least 15 mgd of potable reuse water</td>
<td>December 31, 2023</td>
</tr>
<tr>
<td>Cap total suspended solids mass emission at 11,500 metric tons/year</td>
<td>December 31, 2023</td>
</tr>
<tr>
<td>Produce a cumulative total of at least 30 mgd of potable reuse water</td>
<td>December 31, 2027</td>
</tr>
<tr>
<td>Cap total suspended solids mass emission at 9,942 metric tons/year</td>
<td>December 31, 2027</td>
</tr>
<tr>
<td>Produce a cumulative total of at least 83 mgd of potable reuse water</td>
<td>December 31, 2035</td>
</tr>
</tbody>
</table>
11b. Consideration of a Joint Resolution of the Metro Wastewater JPA and Metro Commission Supporting the City of San Diego’s National Pollutant Discharge Elimination System (NPDES) Modified Permit for the Point Loma Wastewater Treatment Plant. Ed Walton, City Engineer, introduced Greg Humora, Public Works Director for the City of La Mesa and the Chairman of the MetroTAC, a technical advisory committee to the Wastewater JPA.

Mr. Humora made a presentation for the Council and the public.

Councilmember Denny thanked all those involved for their work on this in conjunction with the steering committee.

Councilmember Ovrom thinks that the City of San Diego and the Metro Commission have come up with a positive on both sides plan. It is a positive on reducing the solids by taking a particular piece of that and transforming it into potable water and helps to solve two problems.

MSUC (Denny/Ovrom) moved that the City Council direct Councilmember Barbara Denny, the City’s representative to the Metro Commission/JPA, to support the City of San Diego’s Point Loma Wastewater Treatment Plant (PLWTP) modified NPDES permit application.

AYES: Bailey, Denny, Ovrom, Tanaka
NAYS: None
ABSTAINING: None
ABSENT: Woiwode
RESOLUTION NO. 2014-80

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DEL MAR, CALIFORNIA, TO PROVIDE DIRECTION TO THE METRO COMMISSION/JPA REPRESENTATIVE TO SUPPORT THE CITY OF SAN DIEGO'S POINT LOMA WASTEWATER TREATMENT PLANT MODIFIED NPDES PERMIT APPLICATION

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP), operated by the City of San Diego, is a regional facility in the Metro Wastewater System (Metro System), of which the City of Del Mar is a member. The PLWTP is permitted under a National Pollutant Discharge Elimination Permit (NPDES) to treat 240 million gallons per day (mgd) of wastewater to an Advanced Primary Level, serving a 12-member Joint Powers Authority; and

WHEREAS, the federal Clean Water Act of 1972 requires that all wastewater treatment plants be permitted and that wastewater be treated to at least a secondary level before ocean discharge. Permits must be renewed every five years. The Act was amended several years later to allow a modified permit (waiver of secondary) if the discharger could demonstrate the safe discharge of wastewater to the receiving water; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015. Application for a new permit must be submitted no later than January 2015. In order to secure "non-opposition" for modified permits from environmental stakeholders, the City of San Diego agreed to, and prepared, a wide range of studies to secure support from the community for a modified permit; and

WHEREAS, the PLWTP is operating within the current law, and has demonstrated through 20 years of extensive ocean monitoring there is no harm to the environment; and

WHEREAS, a strategy was developed using the improvements proposed in the 2012 San Diego Recycled Water Study to achieve equivalent treatment to secondary treatment within the Metro System through offloading flows from the PLWTP to other facilities within the system, reducing the discharges at the PLWTP to levels below that required by secondary treatment. In addition, there was proven technology available to convert these offloaded flows into potable drinking water.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Del Mar as follows:

Section 1: That the Council provides direction to the Metro Commission/JPA Representative to support the City of San Diego's Point Loma Wastewater Treatment Plant Modified NPDES Permit Application.
RESOLUTION NO. 2014-80

Section 2: That the City of Del Mar supports pursuing judicial and/or legislative remedies for long-term acceptance of a smaller secondary equivalent PLWTP that continues to protect the ocean environment while avoiding billions of dollars in capital, financing, energy, and operating costs for an unnecessary conversion of the PLWTP to Secondary Treatment.

PASSED, APPROVED AND ADOPTED by the City Council of the City of Del Mar, California, at a Regular Meeting held the 6th day of October 2014.

Al Corti, Deputy Mayor
City of Del Mar

APPROVED AS TO FORM:

Leslie E. Devahay, City Attorney
City of Del Mar

ATTEST AND CERTIFICATION:

STATE OF CALIFORNIA
COUNTY OF SAN DIEGO
CITY OF DEL MAR

I, Andrew Potter, Administrative Services Director/City Clerk of the City of Del Mar, California, DO HEREBY CERTIFY that the foregoing is a true and correct copy of Resolution 2014-80, adopted by the City Council of the City of Del Mar, California, at a Regular Meeting held the 6th day of October 2014, by the following vote:

AYES: Deputy Mayor Corti, Council Members Mosier, Parks and Sinnott
NOES: None
ABSENT: Mayor Haydu
ABSTAIN: None

ANDREW POTTER,
Administrative Services Director/City Clerk
City of Del Mar
October 20, 2014

Metro JPA
Lori Anne Peoples
Metro Commission/Metro JPA Secretary

Subject: Point Loma Wastewater Treatment Plant Modified NPDES Permit Renewal

Dear Ms. Peoples,

Attached is the Council Report on the subject matter from the agenda of October 20, 2014.

Our City Council voted unanimously to approve the item and direct JPA Member/City Council Member Tony Ambrose to Support the City of San Diego's Point Loma Wastewater Treatment Plant Modified NPDES Permit. Including the items supported in the draft JPA Resolution.

If you have any question please contact me at 619-441-1661.

Sincerely,

Dennis Davies
Deputy Director of Public Works

C: Tony Ambrose
Majed Al-Ghafrfy
TO: Mayor Wells, Mayor Pro Tem Kendrick
 Councilmembers Ambrose, Bales, McClellan

FROM: Deputy Director of Public Works

SUBJECT: Point Loma Wastewater Treatment Plant Modified NPDES Permit Renewal and Direction to the Metro Commission/JPA Representative.

RECOMMENDATION: That the City Council provide direction to the Metro Commission/JPA Representative to Support the City of San Diego’s Point Loma Wastewater Treatment Plant Modified NPDES Permit Application.

BACKGROUND: The City of El Cajon has been a partner in the Metropolitan Sewerage System (Metro System) since 1961. The Point Loma Wastewater Treatment Plant, constructed in 1963, is the backbone of the Metro System and where El Cajon’s eight million gallons a day of wastewater are processed. El Cajon is one of twelve participating agencies (PAs) that convey wastewater to the Metro System for treatment.

The Metropolitan Wastewater Commission (Metro Commission) was formed in 1998 pursuant to the terms of the Regional Wastewater Disposal Agreement between PAs and San Diego. Each participating agency has representation on the Metro Commission. The Metro Commission is an advisory body to the San Diego City Council. The Regional Wastewater Disposal Agreement stipulates that the City of San Diego is the owner of the Metropolitan Wastewater System and responsible for all decisions with respect to the planning, design, construction, and operation.

The Point Loma Wastewater Treatment Plant operates under a National Pollutant Discharge Elimination Permit (NPDES) from the Environmental Protection Agency (EPA). Each permit is good for a five-year period following issuance. The current permit expires in July 2015 and must be submitted for renewal in January 2015. The San Diego City Council plans to take action on the permit application on October 28, 2014. Therefore, San Diego has requested that the Metro Commission provide input on the permit application prior to this date. The Metro Commission will consider this item at a special meeting on October 16, 2014.

This report is being presented to the El Cajon City Council at this time so that the Council might discuss the permit application and provide direction to Metro
Commission representative Councilmember Ambrose prior to the next Metro Commission meeting. The City of San Diego has requested that the Metro Commission support San Diego’s modified NPDES permit application for the Point Loma Wastewater Treatment Plant.

Although a waiver from secondary treatment at Point Loma was successfully secured in 2010, there is consensus that there is significant risk in applying for future waivers and that they may not be granted. The uncertain and time-consuming process of stakeholder negotiation that accompanies the waiver application process is a significant resource drain and creates sewer rate increases and infrastructure planning issues. Therefore, the City of San Diego and the rest of Metro JPA partners are focusing on a “Secondary Equivalency” option to address the long term needs of wastewater treatment. This is the concept of reducing the amount of discharge from the Point Loma Treatment Plant by recycling highly treated wastewater for potable use to produce emissions that would be equivalent to secondary treatment for the whole Point Loma Treatment Plant. Using this strategy will eliminate the costly upgrade to the treatment plant and produce a valuable commodity in potable water.

As a parallel approach, El Cajon recently entered into an agreement to explore the feasibility of having of Padre Dam Municipal Water District (Padre Dam) treat El Cajon’s wastewater for potable reuse. Padre Dam’s water purification project may have the ability to treat the majority of east county wastewater locally and allows for reuse by Helix Water District and Padre Dam. Hence, Support of San Diego’s waiver process does not conflict with the Padre Dam’s Project.

A draft Metro Commission Resolution and technical information document regarding NPDES permitting is attached for your information. Staff recommends that the City Council provide direction to the Metro Commission representative to support the attached resolution which supports the City of San Diego’s NPDES Modified Permit application for the Point Loma Wastewater Treatment Plant.

FISCAL IMPACT: There is no fiscal impact as a result of this action. Cost allocation scenarios are currently under discussion with the City of San Diego. Future projects will have sewer rate impacts which will be reviewed under the next sewer rate case in 2016.

PREPARED BY: Dennis C. Davies
DEPUTY DIRECTOR OF PUBLIC WORKS

REVIEWED BY: Majed Al-Ghafray
ASSISTANT CITY MANAGER

APPROVED BY: Douglas Williford
CITY MANAGER

Attachments
Technical Information
Draft Metro Commission Resolution
RESOLUTION NO. 2014-7514

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF IMPERIAL BEACH,
SUPPORTING THE SAN DIEGO PURE WATER PROGRAM AND SECONDARY
EQUIVALENCY FOR POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility
in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240
million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint
Powers Authority that comprises approximately 35% of the total flow in the Metro Wastewater
System/PLWTP; and

WHEREAS, the City of Imperial Beach is one of the 12 members of the above
mentioned Metro Wastewater Joint Powers Authority; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve
certain protections before ocean discharge and the permitting of wastewater treatment plants,
and wastewater treatment plant permits must be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San
Diego to apply for modified permits allowing PLWTP to continue operating at an Advanced
Primary Treatment Level while meeting or exceeding all general and specifically negotiated
regulatory obligations including ocean protection requirements; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and
City of San Diego staff must finalize a strategy and begin the extensive work required to secure
the next permit in or around January 2014; and

WHEREAS, in order to secure “non-opposition” for modified permits from environmental
stakeholders, the City of San Diego agreed to and successfully prepared verifiable estimates of
the cost to convert the current 240 million gallon per day (mgd) PLWTP to Secondary Treatment
Levels, conducted a comprehensive external scientific review of ocean monitoring implementing
all recommendations for an enhanced ocean monitoring program, and built 45 mgd of water
reclamation capacity in the form of the North City Water Reclamation Plant and the South Bay
Water Reclamation Plant; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating
that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego has successfully completed a 1 mgd Advanced Water
Purification Demonstration Project producing water that is far superior in quality to raw water
currently delivered to local reservoirs, and produces potable water of a quality similar to distilled
water; and

WHEREAS, the City of San Diego has determined that instead of converting the Point
Loma Wastewater Treatment Plant to a secondary treatment plant, equivalent results can be
achieved by offloading wastewater flow from the Plant to other existing and new facilities
(secondary equivalency) for potable water reuse; and

WHEREAS, the City of San Diego's survey indicates that percentages of those favoring
Advanced Treated recycled water as an addition to the drinking water supply have increased
from 36% in 2004 to 73% in 2012; and
WHEREAS, the San Diego region forecasts the need for billions of dollars in ratepayer revenue to fund imported water supply projects to address transportation constraints and supply challenges, including a locally owned Colorado River pipeline and plans for at least three ocean desalination plants, all of which will require significant capital, operating and energy expenditures; and

WHEREAS, the Metro Commission sees the Pure Water Program, the City of San Diego's 20-year program to produce purified water to supplement San Diego's drinking water supply, as a first step toward realizing the possibility of fully utilizing wastewater supplies to maximize development of local water supply acknowledging that future expansion and ability to minimize flows to wastewater treatment plants will depend on technological and legislative advances, cost benefit analysis, and actual flows compared to projections; and

WHEREAS, the Pure Water Program will avoid billions of dollars in unnecessary capital, financing, energy and operating costs to upgrade a facility that already meets or exceeds all general and specifically negotiated regulatory requirements for ocean protection; and

WHEREAS, the City of San Diego, member agencies of the Metro Wastewater JPA, members of the Metro Commission, and stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II) to allow PLWTP to remain operating at the Advanced Primary Treatment Level that includes a commitment to the San Diego Pure Water Program; and

WHEREAS, the City of San Diego is not including in its permit application materials for PLWTP any expressed or implied proposal to divert wastewater to a South Bay plant for treatment and discharge through the South Bay Ocean Outfall.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Imperial Beach, as follows:

Section 1: The City of Imperial Beach supports development of Pure Water Program that includes the most cost effective water reuse options for potable reuse within the Metro Wastewater System that will maximize the beneficial use of recycled water as a new local water supply without the need for additional wastewater treatment that will discharge secondary treated effluent from the South Bay Ocean Outfall. To accomplish these goals, the support from the City of Imperial Beach is contingent on commitments included in correspondence from the City of San Diego on May 13, 2014, to include:

A. All studies related to the review of the maximum potable water reuse capacity for reservoir augmentation at the San Vicente and Otay Reservoirs will be shared and discussed with the City of Imperial Beach.
B. All planning studies related to the City of San Diego proposed facilities plan will be shared and discussed with the City of Imperial Beach.
C. The City of San Diego will review and update the existing studies for the South Bay Ocean Outfall to validate or correct the original assumptions and criteria concerning marine and shoreline impacts up to full discharge The City of San Diego will update the 2009 South Bay Ocean Outfall plume study to identify the impacts of the current flow and to model projected future flows up to maximum outfall permitted capacity. Furthermore, real time ocean current moorings will be installed and in operation no later than July 1, 2015.
D. The City of San Diego will make available all ocean monitoring data to the City of Imperial Beach for review and inspection.

E. The City of San Diego will organize a Rapid Response Team to address concerns of odors, visual pollution, water sampling and other potential events in need of immediate action.

Section 2: That the City of Imperial Beach supports developing the Pure Water Program with the goal of realizing a smaller secondary equivalent PLWTP to avoid spending billions of dollars in ratepayer monies for an unnecessary upgrade to Secondary Treatment, instead potentially funding the creation of new water supplies, including potable water reuse.

Section 3: That the City of Imperial Beach supports the Pure Water Program to maximize opportunities to create new, local sustainable water supplies thereby creating opportunities to avoid or downsize billions of dollars in future water supply projects.

Section 4: That the City of Imperial Beach supports the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and supports proposing the passage of federal legislation that would allow the City's NPDES permit to be based on secondary equivalency and includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level.

Section 5: That the City of Imperial Beach supports the proposed NPDES Modified Permit application for the PLWTP to continue operation at Advanced Primary Level.

PASSED, APPROVED, AND ADOPTED by the City Council of the City of Imperial Beach at its meeting held on the 1st day of October 2014, by the following vote:

AYES: COUNCILMEMBERS: BRAGG, SPRIGGS, BILBRAY, PATTON, JANNEY
NOES: COUNCILMEMBERS: NONE
ABSENT: COUNCILMEMBERS: NONE

ATTEST: 

JACQUELINE M. HALL, CMC
CITY CLERK

JAMES C. JANNEY, MAYOR
I, Mary J. Kennedy, City Clerk of the City of La Mesa, California, do hereby certify that the La Mesa City Council, at its meeting of September 23, 2014, took action as follows:

STAFF REPORT

5. POINT LOMA WASTEWATER TREATMENT PLANT MODIFIED NATURAL POLLUTANT DISCHARGE ELIMINATION (NPDES) PERMIT RENEWAL AND DIRECTION TO THE METRO COMMISSION/JPA REPRESENTATIVE

ACTION: Motioned by Mayor Madrid and seconded by Councilmember Ewin to approve the recommendation to direct the Metro Commission/JPA Representative to support the City of San Diego’s Point Loma Wastewater Treatment Plant Modified NPDES Permit Application.

Vote: 5-0
Yes: Mayor Madrid, Vice Mayor Sterling, Councilmember Alessio, Councilmember Arapostathis and Councilmember Ewin
No: None
Abstained: None
Absent: None

Motion passed.

Date: October 15, 2014

Mary J. Kennedy, CMC, City Clerk

(SEAL)
RESOLUTION NO. 2014-268
RESOLUTION OF THE BOARD OF DIRECTORS OF THE LEMON GROVE SANITATION DISTRICT: SUPPORTING THE CITY OF SAN DIEGO’S NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MODIFIED PERMIT FOR THE POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240 million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint Powers Authority that comprises approximately 35 percent of the total flow in the Metro Wastewater System; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve certain protections before ocean discharge and the permitting of wastewater treatment plants, and wastewater treatment plant permits must be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San Diego to apply for modified NPDES permits allowing PLWTP to continue operating at an Advanced Primary Treatment Level while meeting or exceeding all general and specifically negotiated regulatory obligations including ocean protection requirements; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego has determined that as an alternative to converting the PLWTP to a secondary treatment plant, equivalent results can be achieved by offloading wastewater flow from the plant to other existing and new facilities (secondary equivalency) for potable water reuse; and

WHEREAS, the Metro Commission/Metro JPA sees the Pure Water Program, the City of San Diego’s 20-year program to produce purified water to supplement San Diego’s drinking water supply, as a first step toward realizing the possibility of fully utilizing wastewater supplies to maximize development of local water supply acknowledging that future expansion and ability to minimize flows to wastewater treatment plants will depend on technological and legislative advances, cost benefit analysis, and actual flows compared to projections; and

WHEREAS, the strategy of achieving secondary equivalency at the Point Loma Wastewater Treatment Plant through potable reuse of wastewater has included within the Pure Water San Diego program; and

WHEREAS, the City of San Diego, the member agencies of Metro Commission/Metro JPA, and stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II); and

WHEREAS, generally, OPRA II will allow the San Diego’s NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and City of San Diego staff need to submit an application to renew the NPDES permit by January 30, 2015.
NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Lemon Grove Sanitation District hereby:

1. Supports that the Point Loma Wastewater Treatment Plant to remain operating at an Advanced Primary Treatment Level.

2. Supports the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and supports proposing the passage of federal legislation that would permit secondary equivalency at the Point Loma Wastewater Treatment Plant.

3. Supports the City of San Diego's NPDES Modified Permit application for the Point Loma Wastewater Treatment Plant.

4. Directs its representatives on the Metro Commission/Metro JPA to support the items identified above.

/////
PASSED AND ADOPTED: On October 7, 2014, the Board of Directors of the Lemon Grove Sanitation District of the City of Lemon Grove, adopted resolution No. 2014-268, by the following vote:

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<th>BOARD MEMBERS</th>
<th>AYES</th>
<th>NOES</th>
<th>ABSTAIN</th>
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<td>Howard Cook</td>
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<td>Racquel Vasquez</td>
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Attest: ____________________________

MARY TERESA SESSOM, Chair of the Board

Attest:

SUSAN GARCIA, Secretary of the Board
RESOLUTION NO. 2014 – 143

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF NATIONAL CITY ADOPTING A JOINT RESOLUTION OF THE METRO WASTEWATER JOINT POWERS AUTHORITY AND THE METRO COMMISSION, AND SUPPORTING THE CITY OF SAN DIEGO’S NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MODIFIED PERMIT FOR THE POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the City of National City has been a partner in the San Diego Metro Wastewater System since 1944; and

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP), constructed in 1963, is the backbone of the Metro System. The City of National City is one of 12 participating agencies (PAs) that convey wastewater to the Metro System for treatment; and

WHEREAS, the Metropolitan Wastewater Commission ("Metro Commission") was formed in 1998 pursuant to the terms of the Regional Wastewater Disposal Agreement between PAs and the City of San Diego; and

WHEREAS, the Metro Commission is an advisory body to the San Diego City Council. The Regional Wastewater Disposal Agreement stipulates that the City of San Diego owns the Metro System and that all decisions with respect to the planning, design, construction, operation and maintenance shall rest with the City of San Diego in consultation with the Metro Commission; and

WHEREAS, the City of San Diego has requested that the Metro Commission support San Diego's modified National Pollution Discharge Elimination System (NPDES) permit application for the Point Loma Wastewater Treatment Plant; and

WHEREAS, the PLWTP operates under an NPDES permit from the Environmental Protection Agency (EPA). Each permit is good for five years following issuance. The current permit expires in July 2015 and must be submitted for renewal in January 2015; and

WHEREAS, the San Diego City Council plans to take action on the permit application on October 28, 2014, therefore City of San Diego staff have requested the Metro Commission to provide input on the permit application prior to this date; and

WHEREAS the Metro Commission supports the action proposed by the City of San Diego, and will consider adopting a Resolution at a special meeting on October 16, 2014 (Exhibit "A"); and

WHEREAS the Metro Commission has requested that member agencies support the action proposed by the City of San Diego and the Metro Commission,

NOW, THEREFORE, BE IT RESOLVED that the City of National City supports the actions being taken by the City of San Diego and the Metro Commission and supports the Resolution (Exhibit "A") being considered at a special a special meeting of the Metro Commission on October 16, 2014

[Signature Page to Follow]
PASSED and ADOPTED this 7th day of October, 2014.

ATTEST:

Ron Morrison, Mayor

Michael R. Dalla, City Clerk

APPROVED AS TO FORM:

Claudia Gacitua Silva
City Attorney
Exhibit A

RESOLUTION NO. 14-

A JOINT RESOLUTION OF THE METRO WASTEWATER JPA AND METRO COMMISSION, SUPPORTING THE CITY OF SAN DIEGO’S NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MODIFIED PERMIT FOR THE POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240 million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint Powers Authority that comprises approximately 35% of the total flow in the Metro Wastewater System/PLWTP; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve certain protections before ocean discharge and the permitting of wastewater treatment plants, and wastewater treatment plant permits must be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San Diego to apply for modified NPDES permits allowing PLWTP to continue operating at an Advanced Primary Treatment Level while meeting or exceeding all general and specifically negotiated regulatory obligations including ocean protection requirements; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego has determined that instead of converting the Point Loma Wastewater Treatment Plant to a secondary treatment plant, equivalent results can be achieved by offloading wastewater flow from the Plant to other existing and new facilities (secondary equivalency) for potable water reuse; and

WHEREAS, the Metro Commission sees the Pure Water Program, the City of San Diego’s 20-year program to produce purified water to supplement San Diego’s drinking water supply, as a first step toward realizing the possibility of fully utilizing wastewater supplies to maximize development of local water supply acknowledging that future expansion and ability to minimize flows to wastewater treatment plants will depend on technological and legislative advances, cost benefit analysis, and actual flows compared to projections; and

WHEREAS, the strategy of achieving secondary equivalency at the Point Loma Wastewater Treatment Plant through potable reuse of wastewater has included within the Pure Water San Diego program; and

WHEREAS, the City of San Diego, the member agencies of Metro Wastewater JPA, members of the Metro Commission, and stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II). Generally, OPRA II will allow the City’s NPDES permit to be based on secondary
equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and City of San Diego staff need to submit an application to renew the NPDES permit by January 30, 2015.

NOW, THEREFORE, BE IT RESOLVED by the Board of the Metro Wastewater JPA and Metro Commission as follows:

Section 1: That the Metro Wastewater JPA and Metro Commission support the Point Loma Wastewater Treatment Plant to remain operating at an Advanced Primary Treatment Level.

Section 2: That Metro Wastewater JPA and Metro Commission support the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and supports proposing the passage of federal legislation in accordance with the proposal titled the Ocean Pollution Reduction Act II (OPRA II), attached hereto as Exhibit “A” and incorporated herein. OPRA II will allow the City’s NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level.

Section 3: That Metro Wastewater JPA and Metro Commission support the City of San Diego’s NPDES Modified Permit application for the Point Loma Wastewater Treatment Plant as further described in the Basis of Point Loma Permit Application, attached hereto as Exhibit “B” and incorporated herein.

PASSED AND ADOPTED at a regular meeting of the Board of the Metro Wastewater JPA and Metro Commission on the ___ day of October, 2014:

AYES:

NOES:

ABSENT:

ABSTAIN:

Cheryl Cox, Chair

ATTEST:

Lori Anne Peoples, Secretary
Passed and adopted by the Council of the City of National City, California, on October 7, 2014 by the following vote, to-wit:

Ayes: Councilmembers Cano, Morrison, Natividad, Rios, Sotelo-Solis.

Nays: None.

Absent: None.

Abstain: None.

I HEREBY CERTIFY that the above and foregoing is a full, true and correct copy of RESOLUTION NO. 2014-143 of the City of National City, California, passed and adopted by the Council of said City on October 7, 2014.
RESOLUTION NO. 4243

A JOINT RESOLUTION OF THE OTAY WATER DISTRICT AS A MEMBER OF AND WITH THE METRO WASTEWATER JPA/METRO COMMISSION, SUPPORTING THE CITY OF SAN DIEGO’S NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) FOR THE POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240 million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint Powers Authority that comprises approximately 35% of the total flow in the Metro Wastewater System/PLWTP; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve certain protections before ocean discharge and the permitting of wastewater treatment plants, and wastewater treatment plant permits must be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San Diego to apply for modified NPDES permits allowing PLWTP to continue operating at an Advanced Primary Treatment Level while meeting or exceeding all general and specifically negotiated regulatory obligations including ocean protection requirements; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego and Stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called Ocean Pollution Reduction Act II (OPRA II). Generally, OPRA II will allow the City’s NPDES permit to be based on secondary equivalency with a commitment to implement potable reuse of wastewater and allow the PLWTP to remain operating at the Advanced Primary Treatment Level; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and City of San Diego staff need to submit an application to renew the NPDES permit by January 30, 2015.
NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Otay Water District as follows:

- That the Board of Directors of the Otay Water District desires the Point Loma Wastewater Treatment Plant to remain operating at an Advanced Primary Treatment Level.

- That the Board of Directors of the Otay Water District supports the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and desires the passage of federal legislation in accordance with the proposal call Ocean Pollution Reduction Act II (OPRA II). Generally, OPRA II will allow the City’s NPDES permit to be based on secondary equivalency with a commitment to implement potable reuse of wastewater and allow the PLWTP to remain operating at the Advanced Primary Treatment Level.

- That the Board of Directors of the Otay Water District supports the City of San Diego’s NPDES Permit Application for the Point Loma Wastewater Treatment Plant as further described in the attached Basis of Point Loma Application.

PASSED AND ADOPTED at a regular meeting of the Board of Directors of the Otay Water District on the 1st day of October, 2014:

AYES: Directors Croucher, Gonzalez, Lopez and Thompson

NOES: None

ABSENT: Director Robak

ABSTAIN: None

ATTEST:

[Signature]
President

[Signature]
District Secretary
RESOLUTION 2014-24

RESOLUTION OF THE BOARD OF DIRECTORS OF PADRE DAM MUNICIPAL WATER DISTRICT SUPPORTING THE CITY OF SAN DIEGO'S NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MODIFIED PERMIT FOR THE POINT LOMA WASTEWATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240 million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint Powers Authority that comprises approximately 35% of the total flow in the Metro Wastewater System/PLWTP; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve certain protections before ocean discharge and the permitting of wastewater treatment plants, and wastewater treatment plant permits must be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San Diego to apply for modified NPDES permits allowing PLWTP to continue operating at an Advanced Primary Treatment Level while meeting or exceeding all general and specifically negotiated regulatory obligations including ocean protection requirements; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego has determined that instead of converting the Point Loma Wastewater Treatment Plant to a secondary treatment plant, equivalent results can be achieved by offloading wastewater flow from the Plant to other existing and new facilities (secondary equivalency) for potable water reuse; and

WHEREAS, Padre Dam Municipal Water District ("Padre Dam") sees the Pure Water Program, the City of San Diego's 20-year program to produce purified water to supplement San Diego's drinking water supply, as a first step toward realizing the possibility of fully utilizing wastewater supplies to maximize development of local water supply acknowledging that future expansion and ability to minimize flows to wastewater treatment plants will depend on technological and legislative advances, cost benefit analysis, and actual flows compared to projections; and

WHEREAS, the strategy of achieving secondary equivalency at the Point Loma Wastewater Treatment Plant through potable reuse of wastewater has been included within the Pure Water San Diego program; and

WHEREAS, the City of San Diego, the member agencies of Metro Wastewater JPA and Metro Commission, which includes Padre Dam, and stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II). Generally, OPRA II will allow the City's NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level; and
WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and City of San Diego staff need to submit an application to renew the NPDES permit by January 30, 2015.

NOW, THEREFORE, BE IT RESOLVED by the Padre Dam Board of Directors as follows:

Section 1: That Padre Dam Municipal Water District supports the Point Loma Wastewater Treatment Plant to remain operating at an Advanced Primary Treatment Level.

Section 2: That Padre Dam Municipal Water District supports the concept of secondary equivalency for the Point Loma Wastewater Treatment Plant and supports proposing the passage of federal legislation in accordance with the proposal titled the Ocean Pollution Reduction Act II (OPRA II), attached hereto as Exhibit “A” and incorporated herein. OPRA II will allow the City’s NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level.

Section 3: That Padre Dam Municipal Water District supports the City of San Diego’s NPDES Modified Permit application for the Point Loma Wastewater Treatment Plant as further described in the Basis of Point Loma Permit Application, attached hereto as Exhibit “B” and incorporated herein.

PASSED AND ADOPTED by the Padre Dam Board of Directors on September 22, 2014 by the following vote, to wit:

AYES: Caires, Peasley, Pommering, Scalzitti and Wilson
NOES: None
ABSENT: None
ABSTAIN: None

ATTEST:

[Signature]
Board Secretary

[Signature]
Board President
OCEAN POLLUTION REDUCTION ACT II

SECTION 1. SHORT TITLE.

This Act may be cited as the "Ocean Pollution Reduction Act II."

SECTION 2. FINDINGS AND POLICY

In 1972, Congress passed the Federal Water Pollution Control Act Amendments, which required Publicly Owned Treatment Works to achieve secondary treatment capability by 1977.

In 1994, the Federal District Court for the Southern District of California determined that upgrading the City of San Diego's Point Loma Wastewater Treatment Plant to secondary treatment level would not be in the public interest, being excessively costly without producing additional environmental benefits.

The Point Loma Plant currently meets all the requirements of secondary treatment except for the removal of total suspended solids and biological oxygen demand.

At the direction of Congress, the Environmental Protection Agency (EPA) requested that the National Research Council advise the agency on ways to improve wastewater management in coastal urban areas. The resulting study, "Managing Wastewater in Coastal Urban Areas," produced several important findings, including:

- Biological oxygen demand discharged through a well-designed outfall is generally of no ecological concern in open coastal waters.

- Total suspended solids can be adequately controlled by advanced primary treatment and high dilution outfalls.

- Over-control is particularly likely along ocean coasts, but nevertheless full secondary treatment is required regardless of cost or lack of benefits.

Past reviews by the City, the EPA, the State of California, and scientists affiliated with the Scripps Institution of Oceanography and the University of California at San Diego, as well as other organizations have concluded the Point Loma Plant does not have a significant adverse impact on the ocean environment.

The ocean outfall for the Point Loma Plant discharges effluent 4.5 miles from the coast at a depth of over 300 feet, one of the longest and deepest in the world.

Implementing full secondary treatment at the Point Loma Plant will cost approximately $2.1 billion.
Implementing full secondary treatment is contrary to the national interest, in that it will compromise views from the Cabrillo National Monument and interfere with the Navy's use of adjacent property.

The City generates all the energy it needs to operate the Point Loma Plant onsite through co-generation. Implementing full secondary treatment will turn a "green" facility into one of the region's largest energy consumers, requiring the purchase of over $17 million each year in electricity and producing more than 100,000 tons of greenhouse gas emissions annually.

Implementing full secondary treatment at the Point Loma Plant will require removal of 1,250,000 tons of earth from environmentally sensitive habitat immediately adjacent to the Point Loma Ecological Reserve.

Recognizing the unique situation surrounding the Point Loma Plant, Congress adopted the Ocean Pollution Reduction Act of 1994 (OPRA). OPRA allowed the Point Loma Plant to avoid conversion to full secondary treatment and instead operate under a modified permit according to standards contained in OPRA and section 301(h) of the Clean Water Act.

The City has complied with all requirements of OPRA and the results have been significant, including reduction in the discharge of total suspended solids and biological oxygen demand, advanced ocean monitoring, and construction of 45 million gallons per day of reclaimed water capacity at a cost of approximately $340 million.

Successor legislation to OPRA will capitalize on the record of improvements initiated under OPRA and provide a framework for further enhancements to the City's water and wastewater systems, increased potable water reliability, and additional meaningful environmental protection.

The City has completed its Water Purification Demonstration Project showing that municipal wastewater can successfully be treated to levels suitable for potable reuse. The City completed its Recycled Water Study in 2012 describing how wastewater can be diverted from the Point Loma Plant to new treatment facilities to generate water suitable for potable reuse. Through the construction and operation of new treatment facilities, the City can reduce the total suspended solids discharged by the Point Loma Plant to the same or lower levels as would be achieved by implementing full secondary treatment, while creating an important new local source of water.

The City currently relies on imported water for over 85% of its water supply. A new local source of water can significantly reduce the environmental impacts of importing water to San Diego from the Colorado River and the California Bay-Delta by offsetting the City's demand for imported water.

Due to severe drought in California, the 2014 water allocation from the State Water Project is only 5% of normal, forcing water agencies to draw down water reserves, implement mandatory conservation measures, and search for new, dependable sources of water.

OPRA II Legislation
Exhibit A
SECTION 3. SAN DIEGO SECONDARY TREATMENT EQUIVALENCY.

Section 301(j)(5) of the Federal Water Pollution Control Act (33 U.S.C. 1311(j)(5)) is amended to read as follows:

(5) SAN DIEGO SECONDARY TREATMENT EQUIVALENCY.

(A) IN GENERAL. Notwithstanding anything to the contrary in the Federal Water Pollution Control Act or the Coastal Zone Management Act, an application for the Point Loma Wastewater Treatment Plant shall be reviewed and processed as the equivalent of an application for a secondary treatment discharge pursuant to subsection (b)(1)(B) and section 402 of the Federal Water Pollution Control Act, provided that the application includes a commitment to:

(i) maintain a deep ocean outfall from the Point Loma Wastewater Treatment Plant with a discharge depth of no less than 300 feet.

(ii) discharge no more than 12,000 metric tons of total suspended solids per year commencing on December 31, 2015, no more than 11,500 metric tons of total suspended solids per year commencing on December 31, 2025, and no more than 9,942 metric tons of total suspended solids per year commencing on December 31, 2027.

(iii) discharge no more than a concentration of 60 milligrams per liter of total suspended solids calculated as a thirty day average.

(iv) remove no less than 80% of total suspended solids on a monthly average, and no less than 58% of biological oxygen demand on an annual average, from wastewater flow tributary to the Point Loma Plant. Wastewater flow is tributary to the Point Loma Plant if it is discharged into the applicant’s wastewater system, or into any wastewater system connected to the applicant’s wastewater system, excluding wastewater flow treated and discharged from facilities separately permitted under section 402.

(v) meet all other effluent limitations of secondary treatment, as defined by the Administrator pursuant to section 304(d)(1), except for any effluent concentration limits for biological oxygen demand.

(vi) comply with federal anti-degradation policy as determined by the Administrator.

(vii) perform ocean monitoring that meets or exceeds the Administrator’s requirements for section 301(h) dischargers.

(B) POTABLE REUSE. To be eligible to submit an application under this paragraph, the applicant must demonstrate to the satisfaction of the Administrator that to the extent
potable reuse is permitted by federal and state regulatory agencies, at least 83 million gallons per day of water suitable for potable reuse on an annual average will be produced by December 31, 2035, from wastewater in the applicant’s wastewater system and wastewater systems connected to the applicant’s wastewater system as of the date of this Act. The Administrator shall determine development milestones necessary to ensure compliance with this paragraph and include said milestones as conditions in each permit issued prior to December 31, 2035.

(C) PREVIOUS OCEAN MONITORING DATA. The applicant must demonstrate to the satisfaction of the Administrator that the applicant has performed monitoring that meets or exceeds the requirements for section 301(h) dischargers for at least the last 10 years.

(D) PENDING APPLICATIONS. Any application for the Point Loma Wastewater Treatment Plant pending on the effective date of this Act shall be reviewed and processed under this paragraph.

(E) SECONDARY TREATMENT. Nothing in this Act shall prevent the applicant from submitting an application for the Point Loma Wastewater Treatment Plant that complies with secondary treatment pursuant to subsection (b)(1)(B) and section 402
Summary of the Basis of the Application for the
Point Loma Wastewater Treatment Plant
2015 NPDES Modified Permit Renewal

The application will be based on:

a. Compliance with CWA section 301(h) requirements for waivers. (required)
b. Compliance with CWA section 301(J) requirements (Ocean Pollution Reduction Act). (required)
c. Point Loma will remain as an Advanced Primary Treatment Plant with a capacity of 240 mgd.
d. It will also contain specific provisions voluntarily included to enhance the application: These include the following provisions that would be included in the final modified NPDES permit as program goals, as well as some enforceable permit requirements.
e. The goals related to water produced will be calculated based on wastewater in the applicant's wastewater system and wastewater systems connected to the applicant's wastewater system:

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RESOLUTION NO. 14-057

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF POWAY, CALIFORNIA, AS A MEMBER OF THE METRO WASTE WATER JPA, SUPPORTING THE CITY OF SAN DIEGO’S 2015 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MODIFIED PERMIT APPLICATION FOR THE POINT LOMA WASTE WATER TREATMENT PLANT

WHEREAS, the Point Loma Wastewater Treatment Plant (PLWTP) is a regional facility in the Metro Wastewater System, operated by the City of San Diego, permitted to treat 240 million gallons of wastewater per day to an Advanced Primary Level, serving a 12 member Joint Powers Authority, including the City of Poway, that comprises approximately 35% of the total flow in the Metro Wastewater System/PLWTP; and

WHEREAS, the Clean Water Act of 1972 requires that wastewater be treated to achieve certain protections before ocean discharge and the permitting of wastewater treatment plants, and wastewater treatment plant permits must be renewed every five years; and

WHEREAS, the Ocean Pollution Reduction Act (OPRA) of 1994 allowed the City of San Diego to apply for modified NPDES permits allowing PLWTP to continue operating at an Advanced Primary Treatment Level while meeting or exceeding all general and specifically negotiated regulatory obligations including ocean protection requirements; and

WHEREAS, the City of San Diego has 20 years of ocean monitoring data demonstrating that the Advanced Primary PLWTP consistently protects the ocean environment; and

WHEREAS, the City of San Diego has determined that instead of converting the PLWTP to a secondary treatment plant, equivalent results can be achieved by offloading wastewater flow from the Plant to other existing and new facilities (secondary equivalency) for potable water reuse; and

WHEREAS, the City of Poway, as a member of the Metro Wastewater JPA, sees the Pure Water Program, the City of San Diego’s 20-year program to produce purified water for San Diego’s drinking water supply, as a first step toward realizing the possibility of fully utilizing wastewater supplies to maximize development of local water supply acknowledging that future expansion and ability to minimize flows to wastewater treatment plants will depend on technological and legislative advances, cost benefit analysis, and actual flows compared to projections; and

WHEREAS, the strategy of achieving secondary equivalency at the PLWTP through potable reuse of wastewater is included within the Pure Water San Diego program; and
WHEREAS, the proposed Pure Water Program will avoid billions of dollars in unnecessary capital, financing, energy and operating costs to upgrade a facility that already meets or exceeds all general and specifically negotiated regulatory requirements for ocean protection; and

WHEREAS, the City of San Diego, representatives of Metro Wastewater JPA and the Metro Commission, and stakeholders from the environmental community have agreed upon a definition for secondary equivalency and will use their best efforts to have federal legislation passed in accordance with the proposal called the Ocean Pollution Reduction Act II (OPRA II); and

WHEREAS, generally, OPRA II will allow the City's NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level; and

WHEREAS, the current modified permit for the PLWTP expires on July 31, 2015, and City of San Diego staff must submit an application to renew the NPDES permit by January 30, 2015.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Poway as follows:

Section 1: That the City of Poway, as a member of the Metro Wastewater JPA, supports the PLWTP to remain operating at an Advanced Primary Treatment Level.

Section 2: That the City of Poway, as a member of the Metro Wastewater JPA, supports the concept of secondary equivalency for the PLWTP and supports proposing the passage of federal legislation in accordance with the proposal titled the Ocean Pollution Reduction Act II (OPRA II), attached hereto as Exhibit "A" and incorporated herein. OPRA II will allow the City's NPDES permit to be based on secondary equivalency that includes a commitment to implement potable reuse of wastewater and allows the PLWTP to remain operating at the Advanced Primary Treatment Level.

Section 3: That the City of Poway, as a member of the Metro Wastewater JPA, supports the City of San Diego's NPDES Modified Permit application for the PLWTP as further described in the Basis of Point Loma Permit Application, attached hereto as Exhibit "B" and incorporated herein.
PASSED, ADOPTED AND APPROVED by the City Council of the City of Poway at a regular meeting this 7th day of October, 2014.

Don Higginson, Mayor

ATTEST:

Sheila R. Cobian, CMC, City Clerk

STATE OF CALIFORNIA )
COUNTY OF SAN DIEGO ) SS

I, Sheila Cobian, CMC, City Clerk of the City of Poway, do hereby certify under penalty of perjury that the foregoing Resolution No. 14-057 was duly adopted by the City Council at a meeting of said City Council held on the 7th day of October, 2014, and that it was so adopted by the following vote:

AYES: CUNNINGHAM, VAUS, MULLIN, GROSCH, HIGGINSON

NOES: NONE

ABSENT: NONE

DISQUALIFIED: NONE

Sheila R. Cobian, CMC, City Clerk
City of Poway

ATTACHMENTS:

Exhibit A: Ocean Pollution Reduction Act II
Exhibit B: Basis of Point Loma Permit Application
SECTION 1. SHORT TITLE.

This Act may be cited as the "Ocean Pollution Reduction Act II."

SECTION 2. FINDINGS AND POLICY

In 1972, Congress passed the Federal Water Pollution Control Act Amendments, which required Publicly Owned Treatment Works to achieve secondary treatment capability by 1977.

In 1994, the Federal District Court for the Southern District of California determined that upgrading the City of San Diego's Point Loma Wastewater Treatment Plant to secondary treatment level would not be in the public interest, being excessively costly without producing additional environmental benefits.

The Point Loma Plant currently meets all the requirements of secondary treatment except for the removal of total suspended solids and biological oxygen demand.

At the direction of Congress, the Environmental Protection Agency (EPA) requested that the National Research Council advise the agency on ways to improve wastewater management in coastal urban areas. The resulting study, "Managing Wastewater in Coastal Urban Areas," produced several important findings, including:

- Biological oxygen demand discharged through a well-designed outfall is generally of no ecological concern in open coastal waters.
- Total suspended solids can be adequately controlled by advanced primary treatment and high dilution outfalls.
- Over-control is particularly likely along ocean coasts, but nevertheless full secondary treatment is required regardless of cost or lack of benefits.

Past reviews by the City, the EPA, the State of California, and scientists affiliated with the Scripps Institution of Oceanography and the University of California at San Diego, as well as other organizations have concluded the Point Loma Plant does not have a significant adverse impact on the ocean environment.

The ocean outfall for the Point Loma Plant discharges effluent 4.5 miles from the coast at a depth of over 300 feet, one of the longest and deepest in the world.

Implementing full secondary treatment at the Point Loma Plant will cost approximately $2.1 billion.
Implementing full secondary treatment is contrary to the national interest, in that it will compromise views from the Cabrillo National Monument and interfere with the Navy's use of adjacent property.

The City generates all the energy it needs to operate the Point Loma Plant onsite through co-generation. Implementing full secondary treatment will turn a "green" facility into one of the region's largest energy consumers, requiring the purchase of over $17 million each year in electricity and producing more than 100,000 tons of greenhouse gas emissions annually.

Implementing full secondary treatment at the Point Loma Plant will require removal of 1,250,000 tons of earth from environmentally sensitive habitat immediately adjacent to the Point Loma Ecological Reserve.

Recognizing the unique situation surrounding the Point Loma Plant, Congress adopted the Ocean Pollution Reduction Act of 1994 (OPRA). OPRA allowed the Point Loma Plant to avoid conversion to full secondary treatment and instead operate under a modified permit according to standards contained in OPRA and section 301(h) of the Clean Water Act.

The City has complied with all requirements of OPRA and the results have been significant, including reduction in the discharge of total suspended solids and biological oxygen demand, advanced ocean monitoring, and construction of 45 million gallons per day of reclaimed water capacity at a cost of approximately $340 million.

Successor legislation to OPRA will capitalize on the record of improvements initiated under OPRA and provide a framework for further enhancements to the City's water and wastewater systems, increased potable water reliability, and additional meaningful environmental protection.

The City has completed its Water Purification Demonstration Project showing that municipal wastewater can successfully be treated to levels suitable for potable reuse. The City completed its Recycled Water Study in 2012 describing how wastewater can be diverted from the Point Loma Plant to new treatment facilities to generate water suitable for potable reuse. Through the construction and operation of new treatment facilities, the City can reduce the total suspended solids discharged by the Point Loma Plant to the same or lower levels as would be achieved by implementing full secondary treatment, while creating an important new local source of water.

The City currently relies on imported water for over 85% of its water supply. A new local source of water can significantly reduce the environmental impacts of importing water to San Diego from the Colorado River and the California Bay-Delta by offsetting the City's demand for imported water.

Due to severe drought in California, the 2014 water allocation from the State Water Project is only 5% of normal, forcing water agencies to draw down water reserves, implement mandatory conservation measures, and search for new, dependable sources of water.
SECTION 3. SAN DIEGO SECONDARY TREATMENT EQUIVALENCY.

Section 301(j)(5) of the Federal Water Pollution Control Act (33 U.S.C. 1311(j)(5)) is amended to read as follows:

(5) SAN DIEGO SECONDARY TREATMENT EQUIVALENCY.

(A) IN GENERAL. Notwithstanding anything to the contrary in the Federal Water Pollution Control Act or the Coastal Zone Management Act, an application for the Point Loma Wastewater Treatment Plant shall be reviewed and processed as the equivalent of an application for a secondary treatment discharge pursuant to subsection (b)(1)(B) and section 402 of the Federal Water Pollution Control Act, provided that the application includes a commitment to:

(i) maintain a deep ocean outfall from the Point Loma Wastewater Treatment Plant with a discharge depth of no less than 300 feet.

(ii) discharge no more than 12,000 metric tons of total suspended solids per year commencing on December 31, 2015, no more than 11,500 metric tons of total suspended solids per year commencing on December 31, 2025, and no more than 9,942 metric tons of total suspended solids per year commencing on December 31, 2027.

(iii) discharge no more than a concentration of 60 milligrams per liter of total suspended solids calculated as a thirty day average.

(iv) remove no less than 80% of total suspended solids on a monthly average, and no less than 58% of biological oxygen demand on an annual average, from wastewater flow tributary to the Point Loma Plant. Wastewater flow is tributary to the Point Loma Plant if it is discharged into the applicant’s wastewater system, or into any wastewater system connected to the applicant’s wastewater system, excluding wastewater flow treated and discharged from facilities separately permitted under section 402.

(v) meet all other effluent limitations of secondary treatment, as defined by the Administrator pursuant to section 304(d)(1), except for any effluent concentration limits for biological oxygen demand.

(vi) comply with federal anti-degradation policy as determined by the Administrator.

(vii) perform ocean monitoring that meets or exceeds the Administrator’s requirements for section 301(h) dischargers.
(B) POTABLE REUSE. To be eligible to submit an application under this paragraph, the applicant must demonstrate to the satisfaction of the Administrator that to the extent potable reuse is permitted by federal and state regulatory agencies, at least 83 million gallons per day of water suitable for potable reuse on an annual average will be produced by December 31, 2035, from wastewater in the applicant's wastewater system and wastewater systems connected to the applicant's wastewater system as of the date of this Act. The Administrator shall determine development milestones necessary to ensure compliance with this paragraph and include said milestones as conditions in each permit issued prior to December 31, 2035.

(C) PREVIOUS OCEAN MONITORING DATA. The applicant must demonstrate to the satisfaction of the Administrator that the applicant has performed monitoring that meets or exceeds the requirements for section 301(h) dischargers for at least the last 10 years.

(D) PENDING APPLICATIONS. Any application for the Point Loma Wastewater Treatment Plant pending on the effective date of this Act shall be reviewed and processed under this paragraph.

(E) SECONDARY TREATMENT. Nothing in this Act shall prevent the applicant from submitting an application for the Point Loma Wastewater Treatment Plant that complies with secondary treatment pursuant to subsection (b)(1)(B) and section 402.
Summary of the Basis of the Application for the Point Loma Wastewater Treatment Plant 2015 NPDES Modified Permit Renewal

The application will be based on:

- Compliance with CWA section 301(h) requirements for waivers. (required)
- Compliance with CWA section 301(j) requirements (Ocean Pollution Reduction Act). (required)
- Point Loma will remain as an Advanced Primary Treatment Plant with a capacity of 240 mgd.
- It will also contain specific provisions voluntarily included to enhance the application: These include the following provisions that would be included in the final modified NPDES permit as program goals, as well as some enforceable permit requirements.
- The goals related to water produced will be calculated based on wastewater in the applicant's wastewater system and wastewater systems connected to the applicant's wastewater system:

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Date: 14 March 2016

To: John Helminski, Assistant Director of Public Utilities
City of San Diego

Subject: Support for San Diego Pure Water Program

This is a two part letter. Part one is in support of the Pure Water Program. In Paradise Hills we realize that there is never going to be enough rainfall to support more than fifty thousand people in the entire county of San Diego. Therefore we must use state of the art purification and reuse what we have. We still need to work on capturing all the storm water runoff and insert that into our drinking water system, perhaps even building additional reservoirs, instead of stadiums or convention centers. Additionally construction of additional houses must be limited unless the builder can certify there is enough water to support the additional people who will live in each dwelling unit.

Thank you for continuing to work on this vital problem. You may add our name to the list of organizations supporting your efforts.

Now for part two: In our community we consider this equally important. The water meter box at 2692 KEEN DRIVE is still missing as of the date of this letter. It is a hazard and liability for which your department and the city is responsible. It has been reported numerous times over the past several years, both by water meter readers and council staff. The entire box is missing, yes THE ENTIRE BOX. We in Paradise Hills would like a new water meter box installed. I know the meter readers would appreciate it too, as they have to get down on their knees to scrape dirt away for the actual meter every time they must read it.

Thanking You In Advance

Guy J. Preuss
Chair
October 1, 2014

Ann Sasaki  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Ms. Sasaki:

The San Diego Audubon Society supports the Pure Water San Diego program that will provide San Diego with a safe, sustainable, local supply of drought-resistant drinking water and help to permanently resolve the Point Loma Wastewater Treatment Plant’s need for a modified permit. We especially appreciate the environmental benefits of the Pure Water program over other measures that might be used to help provide a reliable source of water for our region. The Pure Water Program will not require a substantial expansion of the Point Loma Wastewater Treatment Plant and expansion into the sensitive and unique coastal habitats of that area. It will result in less discharge of Green House Gas than importing more water from distant areas or desalinization of sea water. It will not result in the discharge of hyper-saline treatment brine into the Ocean, and will result in a step-by-step decrease in the discharge of total suspended solids from our ocean outfall. It will not result in the loss of marine life through impingement and entrainment. It will not required the construction of more dams and will hopefully help to allow more water to remain in sensitive waterways like the Bay Delta, the Salton Sea, the Colorado River, and the degraded wetlands at its mouth.

Pure Water San Diego is the best available long-term solution for addressing the City’s water needs in an environmentally appropriate and cost effective way. We greatly appreciate the City’s progress so far and its aggressive plan to move forward. Please add San Diego Audubon Society to the list of agencies, organizations and individuals who actively support this program.

Sincerely,

James A. Peugh  
Conservation Committee Chair  
San Diego Audubon Society
Halla Razak  
Director of Public Utilities  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123  

Dear Ms. Razak:

On October 2nd, the San Diego Business Leadership Alliance (BLA) voted to support the City of San Diego’s “Pure Water San Diego” program. Our membership is comprised of over fifty business advocacy organizations from throughout San Diego County. As supporters of business development, economic growth and the creation of new job opportunities for our region, BLA understands that water is the lifeblood of our economy and a relatively scarce commodity in Southern California. Your City’s Pure Water program will help diversify and expand our available water resources, providing San Diego with a sustainable local supply of drought-proof drinking. In addition, the off-loading of sewage wastewater from the Point Loma Wastewater Treatment Plant as a result of implementation of the Pure Water program will have the added advantage of helping to permanently resolve the need for a modified federal permit for that facility.

Our Member Organizations recognize that Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. We understand that purified water will meet all federal and state drinking water standards and that Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water. As an added benefit, it will help reduce ocean pollution and save ratepayers expensive upgrades to the Point Loma Wastewater Treatment Plant.

Thank you for continuing to move forward and pursue a viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Laurie Madigan  
Executive Director  
San Diego Business Leadership Alliance
Council President Todd Gloria
San Diego City Council
202 C St #10
San Diego, CA 92101
todgloria@sandiego.gov

Re: San Diego Coastkeeper Support for Pure Water and Cooperative Agreement

Sent via email

Dear Council President Gloria and City Councilmembers:

On behalf of San Diego Coastkeeper I am writing to you today to express enthusiastic support for the City’s Pure Water program and associated permitting process. San Diego Coastkeeper is a non-profit organization working to protect and restore the San Diego region’s bays, beaches, watersheds, and ocean. Coastkeeper was founded in 1995 and has worked with the City over these past 19-plus years towards the realization of sound water quality and water supply solutions throughout our region. In continuation of those efforts, we are a signatory to the Pure Water Cooperative Agreement with the City.

With the upcoming vote on this matter, Council is poised to take a leadership role in ushering in a new era and approach to integrated water management solutions in our City, our region, and the southwestern United States. The importance of the upcoming decision cannot be overemphasized. For well over ten years Coastkeeper has been involved in the process of seeking an appropriate solution to Point Loma discharge that includes recycling and the production of locally-controlled potable water for our region. Today, Coastkeeper is pleased to support the City’s Pure Water program and is proud to have been part of the development of the Cooperative Agreement with the City. We believe that this program will benefit not only our ocean and marine environment by beginning to reduce discharges into the ocean, but that it will also greatly benefit our region’s current and future water supply needs.

Thank you for your commitment to finding environmentally appropriate solutions to both our water quality and water supply needs. The Pure Water program is truly a win-win for our City and our region.

Sincerely,

Matt O’Malley
Waterkeeper, Legal & Policy Director
cc:
Council President Pro Tem Sherri Lightner, sherrilightner@sandiego.gov
Councilmember Ed Harris, edharris@sandiego.gov
Councilmember Myrtle Cole, myrtlecole@sandiego.gov
Councilmember Mark Kersey, markkersey@sandiego.gov
Councilmember Lorie Zapf, loriezapf@sandiego.gov
Councilmember Scott Sherman, scottsherman@sandiego.gov
Councilmember David Alvarez, davidalvarez@sandiego.gov
Councilmember Marti Emerald, martiemerald@sandiego.gov
September 26, 2014

Ann Sasaki
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Ms. Sasaki:

The San Diego County Apartment Association (SDCAA) supports the Pure Water San Diego program that will provide San Diego with a safe, sustainable local supply of drought-proof drinking water and help to permanently resolve the Point Loma Wastewater Treatment Plant’s need for a modified permit. We have had the opportunity to learn about the science of Pure Water San Diego, so we understand that purified water will meet all federal and state drinking water standards.

SDCAA believes that Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water. As an added benefit, it helps reduce ocean pollution and save ratepayers expensive upgrades to the Point Loma Wastewater Treatment Plant.

Thank you for continuing to move forward and pursue a viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

[Signature]

Alan Pentico
Executive Director
October 15, 2014

Halla Razak
Director of Public Utilities
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Ms. Razak:

The San Diego Port Tenants Association (SDPTA), a coalition of businesses along the Port Tidelands of San Diego Bay, supports the Pure Water San Diego program because it would provide San Diego with a sustainable local supply of drinking water and permanently resolve the Point Loma Wastewater Treatment Plant’s need for a modified permit. We have had the opportunity to learn about the science of Pure Water San Diego, so we understand that purified water will meet all federal and state drinking water standards.

The SDPTA believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water. As an added benefit, it helps reduce ocean pollution and save ratepayers nearly two billion dollars in upgrades to the Point Loma Wastewater Treatment Plant.

Thank you for continuing to move forward and pursue a viable new water supply for San Diego. Please add SDPTA’s name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Sharon Cloward, President
San Diego Port Tenants Association

CC: SDPTA Board of Directors
September 24, 2014

Ann Sasaki
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Ms. Sasaki:

On behalf of the San Diego Regional Chamber of Commerce (Chamber), I am writing to express our support for the Pure Water San Diego program, which will provide San Diego with a safe, sustainable local supply of drought-proof drinking water and help eliminate the Point Loma Wastewater Treatment Plant’s need for a modified permit.

With nearly 3,000 members representing 400,000 employees, the Chamber is actively involved in local government, regional economic development and providing valuable resources to its members. Through participating in the Mayor’s Pure Water Working Group, the Chamber has had the opportunity to learn the science of Pure Water San Diego and understands that purified water will meet federal and state drinking water standards. Accordingly, on August 28, 2014, the Chamber’s Board of Directors voted to support the Pure Water San Diego program in concept. Further, during the Chamber’s annual delegation trip to Washington, D.C. in September, we hosted a Water Roundtable to discuss advantages of the Pure Water San Diego program with federal, state and local representatives.

Pure Water San Diego presents a long-term solution to the City’s water needs, while also providing region-wide benefits. Pure Water San Diego will give San Diego enhanced control of its water supply, thereby reducing independence on imported water. It will also help reduce ocean pollution and save ratepayers billions in upgrades to the Point Loma Wastewater Treatment Plant.

For the reasons stated above, the Chamber urges you to support the Pure Water San Diego Program. If you have any questions, please do not hesitate to contact Chanelle Hawken, Executive Director of Public Policy, at (619) 544-1365 or chawken@sdchamber.org.

Sincerely,

Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce
CC: Honorable Kevin Faulconer
Honorable Members of the City Council
October 3, 2014

Ann Sasaki
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Ms. Sasaki:

As a 501(c)(6) non-profit organization whose mission is to maximize the San Diego region’s economic prosperity and global competitiveness, San Diego Regional Economic Development Corporation (EDC) strongly supports the Pure Water San Diego program.

The program will provide San Diego with a safe, sustainable local supply of drought-proof drinking water and help to permanently resolve the Point Loma Wastewater Treatment Plant’s need for a modified permit. We have had the opportunity to learn about the science of Pure Water San Diego, so we understand that purified water will meet all federal and state drinking water standards.

Our organization believes Pure Water San Diego is an excellent long-term solution for addressing the city’s water needs. By enhancing the region’s resiliency against drought and ensuring a safe, reliable supply, we can support businesses in the region’s key industries as they continue to grow and compete globally. Numerous industry clusters will benefit greatly from this effort, most notably our life sciences sector, which will have access to a water supply supporting its $14.2 billion direct economic impact and sustaining more than 34,000 jobs per year. A safe and affordable water supply will continue to make the region competitive with regions around the globe and ensure our economic prosperity long into the future.

We thank you for your efforts in pursuing a viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Thank you for your time.

Sincerely,

Mark Cafferty
President and CEO

www.sandiegobusiness.org
Ms. Ann Sasaki  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123

Dear Ms. Sasaki:

The San Diego River Park Foundation is pleased to support the Pure Water San Diego program. We believe it will provide San Diego with a safe, sustainable local supply of drought-proof drinking water. It also can be part of the solution to addressing the permitting issues for the Point Loma Wastewater Treatment Plant.

The San Diego River Park Foundation believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water.

The San Diego River Park Foundation has been active for many years in supporting the City’s efforts to find long-term solutions for our region’s water supply challenges. We believe the science supports this program, and there are sufficient safeguards to protect the public’s health and welfare.

With this letter we reconfirm our support for the Pure Water San Diego program. We are pleased to join with others who are taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Rob Hutsel  
Executive Director

www.sandiegoriver.org
January 12, 2016

John Helminski  
Assistant Director of Public Utilities  
Pure Water San Diego Program  
City of San Diego  
9192 Topaz Way  
San Diego, CA 92123  

Dear Mr. Helminski:

The Southeastern San Diego Planning Group supports the Pure Water San Diego program, which will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. We have had the opportunity to learn about the science of the water purification process and we understand that Pure Water purified water will meet all federal and state drinking water standards.

Our organization believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides a drought-proof water supply, helps reduce ocean pollution, and makes San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Tom Fuller, Chair  
Southeastern San Diego Planning Group
25 January 2016

John Helminski
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Mr. Helminski:

St. Stephen’s Ministries supports the Pure Water San Diego program, which will provide San Diego with a safe, sustainable and local supply of high-quality drinking water. I have had the opportunity to learn about the science of the water purification process and I understand that purified water will meet all federal and state drinking water standards.

We believe that Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply and make the City less vulnerable to the rising costs of imported water. Additionally, Pure Water San Diego provides a drought-proof water supply, helps reduce ocean pollution, and makes San Diego more resilient against climate impacts and natural disasters.

Thank you for continuing to move forward to pursue this viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Bishop George D. McKinney
Founder and Senior Pastor
General Board Member – C.O.G.I.C.

"Upon this Rock I will build my Church."

MINISTRIES
Evangelism/Outreach • Bible Studies • Nurture Groups • Media • Social Services • Home Missions • Foreign Missions

5825 Imperial Avenue • P.O. Box 740039 • San Diego, CA 92174 • TEL: (619) 262-2671 • FAX (619) 262-8335
Email: ststephenscogic@aol.com • Website: www.ststephenscogic.org
September 30, 2014

Ann Sasaki
Assistant Director of Public Utilities
Pure Water San Diego Program
City of San Diego
9192 Topaz Way
San Diego, CA 92123

Dear Ms. Sasaki:

Surfrider Foundation San Diego County Chapter supports the Pure Water San Diego program that will provide San Diego with a safe, sustainable local supply of drought-proof drinking water and help to permanently resolve the Point Loma Wastewater Treatment Plant’s need for a modified permit. We have had the opportunity to learn about the science of Pure Water San Diego, so we understand that purified water will meet all federal and state drinking water standards.

Our chapter believes Pure Water San Diego is an excellent long-term solution for addressing the City’s water needs while also providing region-wide benefits. Pure Water San Diego will give us more control over our water supply, making us less dependent on imported water. As an added benefit, it helps reduce ocean pollution by reducing the amount of wastewater being sent to the Point Loma Wastewater Treatment Plant.

Thank you for continuing to move forward and pursue a viable new water supply for San Diego. Please add our name to the list of agencies, organizations and individuals taking action to ensure the reliability of our economy and the health and safety of our citizens through pro-active water resource planning.

Sincerely,

Roger Kube
Chair
Surfrider Foundation
San Diego County Chapter
September 2, 2016

Mr. Doug McPherson
Southern California Area Office
Bureau of Reclamation
27708 Jefferson Avenue, Suite 202
Temecula, CA 92590

Dear Mr. McPherson:

WateReuse fully supports the Pure Water San Diego Program, North City Project in San Diego County, California. WateReuse encourages the Bureau of Reclamation to consider both the principal and ancillary environmental benefits of this project, including project benefits to regional water supply, as it prepares the Environmental Impact Report/Environmental Impact Statement (FR Doc. 2016-18616).

Most importantly, this project will provide a safe, reliable, locally-controlled water supply to the families and businesses of Southern California. Water supply managers in areas with limited water sources require extensive, flexible toolkits to meet the demands of their communities and reusing wastewater for potable purposes provides a resilient water supply, in the face of climate change, while protecting traditional sources.

On behalf of the more than 200 utilities represented by WateReuse, thank you for your consideration.

Sincerely,

Melissa L. Meeker
Executive Director
Map Document

(This is as uploaded, a blank page will show if nothing was submitted)
Project Elements Map

City of San Diego, Source Water Map