

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

EXECUTIVE OFFICER SUMMARY REPORT

NOVEMBER 13, 2024

ITEM NO. 6

SUBJECT

Consideration of Tentative Resolution No. R9-2024-0131, *A Resolution Accepting South Orange County Water Authority's Salt and Nutrient Management Plan* (Tentative Resolution No. R9-2024-0131). (Brandon Bushnell)

STAFF RECOMMENDATION

Staff recommends adoption of Tentative Resolution No. R9-2024-0131.

KEY ISSUES

- Tentative Resolution No. R9-2024-0131 (**Supporting Document 1**), if adopted, will accept the *San Juan Creek Basin Salt and Nutrient Management Plan* (San Juan Creek SNMP, **Supporting Document 2**) prepared by South Orange County Water Authority (SOCWA), consistent with the State Water Resources Control Board (State Water Board) *Water Quality Control Policy for Recycled Water* (Recycled Water Policy). The San Juan Creek SNMP serves as a technical document to support the management of salts and nutrients from all sources on a basin-wide basis in a manner that ensures attainment of water quality objectives and protection of beneficial uses.
- SOCWA Board of Directors adopted the San Juan Creek SNMP on August 13, 2024, and submitted the San Juan Creek SNMP to the San Diego Water Board for acceptance, in accordance with the Recycled Water Policy.
- Acceptance of the San Juan Creek SNMP will inform future San Diego Water Board actions within the San Juan Creek Basin.

PRACTICAL VISION

Tentative Resolution No. R9-2024-0131 is consistent with the Strategize to Achieve Resilient Local Water Supply chapter of the *San Diego Water Board Practical Vision*.¹ The management of salts and nutrients on a basin-wide scale allows for recycled water

¹ Practical Vision:

https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

producers to work collaboratively with other stakeholders to protect water quality while also expanding recycled water availability in the San Diego region.

DISCUSSION

The purpose of this item is to provide the Board with information to assist in its consideration of Tentative Resolution No. R9-2024-0131. If adopted, Tentative Resolution No. R9-2024-0131, will accept SOCWA's San Juan Creek Basin SNMP. The San Juan Creek SNMP will serve as a technical document to 1) support the management of salts and nutrients from all sources on a basin-wide basis in a manner that ensures attainment of water quality objectives and protection of beneficial uses; and 2) inform future Board actions within the San Juan Creek Basin.

The State Water Board adopted the Recycled Water Policy on February 3, 2009; and amended the policy on January 22, 2013, and December 11, 2018. The Recycled Water Policy encourages the safe use of recycled water from wastewater sources, and established direction to the Regional Water Quality Control Boards (Regional Water Boards), proponents of recycled water projects, and the public regarding the methodology and appropriate criteria for the State Water Board and the Regional Water Boards to use when issuing permits for recycled water projects. The Recycled Water Policy also encourages collaborative work among salt and nutrient management planning groups formed under the Sustainable Groundwater Management Act to achieve the goals of groundwater sustainability, recycled water use, and water quality protection.

SOCWA worked collaboratively with stakeholders after the State Water Board's adoption of the 2018 amendments to the Recycled Water Policy, to review and update SOCWA's 2013 *Salt and Nutrient Management Plan for the South Orange County Aliso Creek, San Juan Creek, and Portions of Other Basins* (2013 SNMP), considering San Diego Water Board staff comments. SOCWA submitted the San Juan Creek SNMP to the San Diego Water Board on August 17, 2021. San Diego Water Board staff reviewed the San Juan Creek SNMP and identified several deficiencies. San Diego Water Board staff shared these deficiencies with SOCWA and provided a list of recommendations for updating the San Juan Creek SNMP to be consistent with the Recycled Water Policy. SOCWA withdrew the San Juan Creek SNMP and reconvened meetings with stakeholders and San Diego Water Board staff.

SOCWA released the draft San Juan Creek SNMP for public review and comment on April 5, 2024. SOCWA received 174 public comments, of which: 84 comments provided focused editorial updates, 25 comments requested technical clarifications, 12 comments requested changes to the figures, maps and document format, 8 comments focused on data sources and management measures, and 5 comments requested additional information. The remaining 40 comments SOCWA characterized as miscellaneous. San Diego Water Board and SOCWA staff met on June 5, 2024, to discuss revisions to the San Juan Creek SNMP, based on public comments. SOCWA submitted the draft San Juan Creek SNMP to Board staff on June 24, 2024. Board staff reviewed the draft San Juan Creek SNMP and provided SOCWA with minor comments. The SOCWA Board of

Directors considered and approved the San Juan Creek SNMP on August 8, 2024, and submitted the San Juan Creek SNMP to Board staff on August 13, 2024.

Board staff evaluated the San Juan Creek SNMP to ensure it is consistent with the Recycled Water Policy, and includes the elements specified in section 6.2.4 of the Policy. The Recycled Water Policy requires that salt and nutrient management plans:

- Establish basin-wide or subbasin-wide monitoring plans that includes an appropriate network of monitoring locations to provide reasonable, cost-effective means of determining whether the concentrations of salts, nutrients, and other constituents of concern are consistent with applicable water quality objectives.
- Establish water recycling use goals and objectives.
- Identify salt and nutrient sources, the fate and transport of salts and nutrients, and the basin assimilative capacity and loading estimates.
- Establish implementation measures to manage or reduce salt and nutrient loading in the basin and the intended outcome of each measure.
- Perform an antidegradation analysis to demonstrate that existing projects, reasonably foreseeable projects, and other sources of loading to the basin will cumulatively, satisfy the requirements of the State Water Board's Resolution No. 68-16, *Statement of Policy with Respect to Maintaining High Quality of Waters in California* (Antidegradation Policy).

Board staff determined that the San Juan Creek SNMP satisfies the requirements of section 6.2.3 of the Recycled Water Policy, and an amendment to the *Water Quality Control Plan for the San Diego Region* is not needed.

PUBLIC NOTICE

The agenda for the November 13, 2024, board meeting was posted on the San Diego's Water Board's website on October 30, 2024. The San Diego Water Board received one comment letter on November 1, 2024, in support of the Board's adoption of the Tentative Resolution (**Supporting Document 3**).

SUPPORTING DOCUMENTS

1. Tentative Resolution No. R9-2024-0131
2. San Juan Creek Basin Salt and Nutrient Management Plan
3. Letter of Support from Clean Water Now