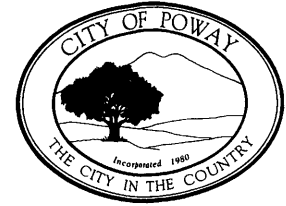


STEVE VAUS, Mayor
BARRY LEONARD, Deputy Mayor
JIM CUNNINGHAM, Councilmember
DAVE GROSCH, Councilmember
JOHN MULLIN, Councilmember

CITY OF POWAY



February 23, 2017

Mr. Henry Abarbanel, Chair
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Re: Comment – Revised Tentative Order No. R9-2017-0007
Support of Point Loma Wastewater Treatment Plant NPDES Modified Permit Renewal

Dear Chair Abarbanel:

I am writing this letter to you in support of the City of San Diego's request to renew its variance from the secondary treatment requirements contained in section 301(b)(1)(B) of the Clean Water Act for the E. W. Blom Point Loma Metropolitan Wastewater Treatment Plant and Ocean Outfall. However, I do not support the proposed changes in the Compliance Schedule for Pure Water San Diego Potable Reuse Tasks and the corresponding table (Table 8) located in section VI.C.7 of Revised Tentative Order No. R9-2017-0007.

The specific changes to the original milestones of 15 MGD by 2023 and 30 MGD by 2027; to 30 MGD by 2022 regarding the ability to produce and deliver purified water to local reservoirs, and the addition of granulated design/construction compliance dates are not needed and unwarranted. The Pure Water Program should be implemented in an efficient, cost effective and practical manner that is the best interest of all parties. Along with our Metro JPA partners, we are in the process of evaluating the proposed accelerated program for consistency, which is not yet complete.

Including construction completion milestones within the permit puts an undue hardship on the collaborative stakeholder process that has occurred with the City of San Diego. These decisions should be made at the local level and not mandated. The City of San Diego and the Metro JPA have continually shown their commitment to the environment by making significant investments in the Pure Water program. Furthermore, construction completion milestones that obligate significant ratepayer funds require more time for evaluation before legally-enforceable commitments are made.

Once again, the City of Poway supports the approval of the NPDES Modified Permit as submitted. The original Permit already contains milestones related to the Pure Water program and therefore does not need any additional changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Mullin".

John Mullin
Councilmember
Metro Wastewater JPA Commission Member