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2554 SWEETWATER SPRINGS BOULEVARD, SPRING VALLEY, CALIFORNIA 91978-2004  
TELEPHONE: 670-2222, AREA CODE 619

[www.otaywater.gov](http://www.otaywater.gov)

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Sent via electronic mail to: [kozelka.peter@epa.gov](mailto:kozelka.peter@epa.gov)  
[joann.lim@waterboards.ca.gov](mailto:joann.lim@waterboards.ca.gov)

San Diego Regional Water Quality Control Board  
2375 Northside Drive, Suite 100  
San Diego, CA 92108-2700

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

The Otay Water District (Otay) supports 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. Otay also supports the approval of the permit, as submitted for the production of 15 million gallons per day of Pure Water.

During the public hearing held on December 14, 2016, there was a brief discussion about the Pure Water Program, how it relates to the permit, and changing the Pure Water milestones within the permit. Otay and the Metro Wastewater Joint Powers Authority do not support changing any of the milestones at this time and feel that the permit, as submitted, is already a substantial commitment to protect the environment.

Otay also is concerned that the uncertainty associated with unknown future water conservation regulations being proposed by the State Water Resources Control Board and the California Department of Water Resources will serve as a significant disincentive for the development of new sustainable water supply sources. The Governor's actions, including the potential to not recognize new drought-proof supplies, could force communities to re-evaluate their decisions when considering future water supply sources. It is important that the permit be approved as submitted, allowing the development of the Pure Water Program to be paced with the progress of the Governor's final framework for conservation regulations.

I am happy to address any questions related to Otay's comments and recommendations. Please feel free to contact me at 619-670-2210 or via e-mail at [mwatton@otaywater.gov](mailto:mwatton@otaywater.gov).

Sincerely,  
OTAY WATER DISTRICT

Mark Watton  
General Manager

MW:jf