



**NORTH SAN DIEGO
WATER REUSE**
c o a l i t i o n

RECEIVED
AUG 30 2016
BY:

August 29, 2016

Judge Jeffrey B. Barton
Presiding Judge of Superior Court
Main Courthouse
Third Floor
220 West Broadway
San Diego, CA 92101

Re: Grand Jury Report: "North San Diego Water Reuse Coalition"

Dear Judge Barton,

The North San Diego Water Reuse Coalition would like to thank the San Diego Grand Jury for its consideration of the Coalition in its May 31 report. The Coalition very much appreciates the Grand Jury's interest in the development of local, sustainable water supplies and the Grand Jury's commendation of the Coalition's approach thereto.

Pursuant to California Penal Code section 933(c), please find below the response of the Coalition to the findings and recommendations presented in the report.

Additionally, the Coalition would like to offer some clarity as to a statement in the report about the Coalition's current membership. The report indicates that Table 1 shows the Coalition's ten partner agencies. Please note that Rancho Santa Fe Community Services District, Whispering Palms Community Services District, and Fairbanks Ranch Community Services District do not currently participate in the Coalition. Encina Wastewater Authority is not a direct participant in the Coalition, but its interests are represented on the Coalition by its member agencies Vallecitos Water District, Carlsbad Municipal Water District and Leucadia Wastewater District. Santa Fe

Irrigation District and Vista Irrigation District, not shown in Table 1, are direct participating members. Please find, attached as Exhibit A, updated Tables 2-5 and 2-16 that accurately reflect all participating agencies and provide updated recycled water demands for each agency.

FINDINGS

Finding 01: The treated water will replace imported drinking water currently used for irrigation and industrial purposes, and will increase regional drinking water supply and reliability.

Response: The Coalition agrees with the finding.

Water reuse offers local agencies excellent opportunities by which to diversify their water supply portfolios. Every drop of water converted to a reclaimed source is one more drop of potable water available to end water users in the region.

Finding 02: Expanding Coalition membership in North County would increase the capacity and connectivity of the recycled water project.

Response: The Coalition agrees with the finding.

Opportunities for expanding water reuse are abundant and as such, a greater number of local agencies are now investigating those opportunities. Coalition members are open to the idea and continue to coordinate with interested agencies.

Finding 03: Rainwater capture would be a valuable addition to the project's suite of measures to diversify local water supply.

Response: The Coalition disagrees partially with the finding.

While the Coalition agrees that in some situations rainwater capture and reuse projects can be viable, in many cases regulatory constraints along with exorbitant costs undermine project viability. That said, the Coalition continues to support the pursuit of stormwater capture and reuse projects as many of the Coalition partners are currently participating in the development of the *San Diego Integrated Regional Water Management (IRWM) Program Stormwater Capture and Use Feasibility Study*. Through this regional study, the Coalition will determine methods and "best practices" by which to pursue these types of projects in the future.

Finding 04: Coalition sales of recycled water to Caltrans could reduce the use of tap water for irrigation.

Response: The Coalition agrees with the finding.

Coalition members including the City of Oceanside, Rincon del Diablo MWD, Vista Irrigation District and City of Escondido continue working with Caltrans to expand the existing use of recycled water to applicable locations.

RECOMMENDATIONS

Recommendation 16-39: Reach out to neighboring non-member agencies to further diversify supply lines.

Response: The recommendation has not yet been implemented, but will be implemented in the future.

Existing Coalition members have executed Joint Cost Sharing agreements that pertain to the procurement of federal grant funds. Once the initial round of federal grant money is procured based on the current agreements, Coalition members will open up to other agencies and expand the Coalition. While no definitive timetable exists for the procurement of federal funding, the Coalition is taking steps to complete a required feasibility study in 2016, in advance of the federal funding opportunity. This will allow for the Coalition to move forward in the most expeditious manner possible. The timeline for federal funding is outside of the Coalition's control; however, the Coalition will immediately work to expand once the federal funding is secured. The Coalition has reached out to nearby neighboring non-member agencies and have advised them of this timeline and the future opportunity to join the Coalition.

Recommendation 16-40: Evaluate large-scale rainwater capture as a means of increasing and further diversifying their wastewater supplies.

Response: The recommendation requires further analysis.

Many agencies in the Coalition have volunteered to participate in the development of the *San Diego Integrated Regional Water Management (IRWM) Program Stormwater Capture and Use Feasibility Study* coordinated by the County of San Diego. The purpose of the study is to provide a County-wide analysis to determine the feasibility of planning, constructing, operating, and managing facilities that capture and use stormwater beneficially. The County will compile stormwater capture and related policies, incentives, and ordinances; review current plans and studies related to stormwater capture; inventory current stormwater capture infrastructure; and assess available regional datasets. The County will quantify the amount of stormwater potentially available for capture in each watershed and sub-watershed within the region. The analysis shall distinguish between stormwater potentially available for

capture and the potential use of captured stormwater. The County will prioritize/rank specific areas, projects, and/or alternatives to increase stormwater capture and use. Regulatory or other institutional constraints will be identified for each category. The County will develop a cost analysis for the highest ranking potential stormwater capture projects, areas, and/or alternatives. A Feasibility Report will be prepared that provides a coherent analysis of the feasibility of stormwater capture and use in San Diego County. Through this regional study, Coalition members may determine methods and "best practices" by which to pursue these types of projects in the future.

Recommendation 16-41: Work to increase use of recycled irrigation water on the State Route 78 corridor between Oceanside and Escondido.

Response: The recommendation has not yet been implemented, but will be implemented in the future.

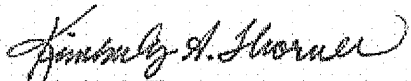
The feasibility planning work to increase the use of recycled irrigation water on the State Route 78 corridor between Oceanside and Escondido is already underway. The City of Escondido and Rincon del Diablo MWD already supply recycled water to Caltrans for use on Interstate 15 and a state road (Centre City Parkway) within its jurisdiction. Escondido and RDDMWD are open to supplying additional recycled water to major users such as Caltrans when supply and cost-effective opportunities for connection are available, subject to city council or Water Board approval.

Vallecitos Water District has included future demands for Caltrans along State Route 78 within its service area in the Programmatic Environmental Impact Report for the Coalition.

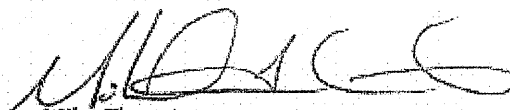
Additionally, the City of Oceanside is currently developing recycled water projects along State Route 78 in conjunction with Caltrans. Vista Irrigation District has also included recycled water demands associated with providing Caltrans irrigation water along State Route 78 in all planning documents associated with the Coalition. Both Vista Irrigation District and City of Oceanside would consider proceeding with projects once appropriate opportunities for connection are identified and when supply and cost-effective opportunities for connection are available.

Again, the Coalition is appreciative of the Grand Jury's careful consideration and favorable assessment of the actions of the North San Diego Water Reuse Coalition. Please contact Kimberly Thorner, General Manager of Olivenhain Municipal Water District at (760)753-6466 or kthorner@olivenhain.com if we can provide any further information on the Coalition or this response to the Grand Jury's report.

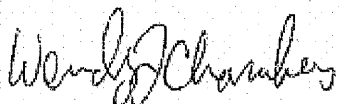
Regards,



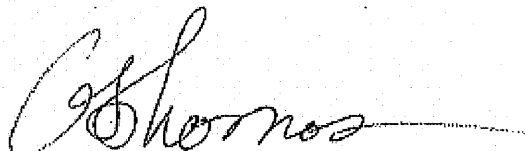
Kimberly Thorne
General Manager
Olivenhain Municipal Water District



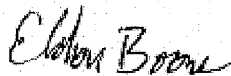
Mike Thornton
General Manager
San Elijo Joint Powers Authority



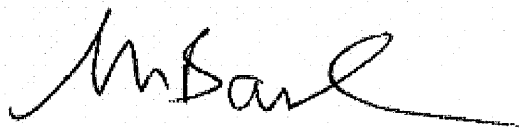
Wendy Chambers
General Manager
Carlsbad Municipal Water District



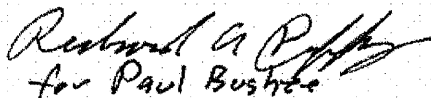
Greg Thomas
General Manager
Rincon del Diablo Municipal Water
District



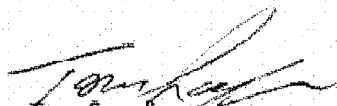
Eldon Boone
General Manager
Vista Irrigation District



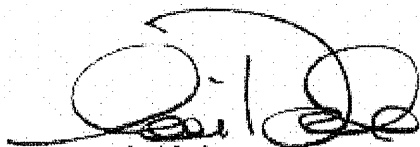
Michael J. Bardin
General Manager
Santa Fe Irrigation District



Paul Bushee
General Manager
Leucadia Wastewater District



Tom Scaglione
Interim General Manager
Vallecitos Water District



Cari Dale
Water Utilities Director
City of Oceanside

Exhibit A

**Table 2-5: Existing and Future Average Demands for
North San Diego Water Reuse Coalition (NSDWRC) Regional Recycled Water Project**

Coalition Member	Group	Treatment Plant(s) to Provide Supply	Existing Demands	Average Demand Increase (AFY)		Total Demands (AFY)
				By 2025	By 2035	
Carlsbad MWD	A	Carlsbad WRF/Gafner WRF	2,150	928	0	3,078
	B	Meadowlark WRF	1,643	357	0	2,000
		Subtotal	3,793	1,285	0	5,078
City of Escondido	C	HARRF	771	4,670	3,035	8,476
	D	Escondido AWTF (Potable Reuse)	0	2,200	0	2,200
		Subtotal	771	6,870	3,035	10,676
San Elijo JPA ²	E	San Elijo WRF/Gafner WRF	700	80	0	780
		Subtotal	700	80	0	780
City of Oceanside	G	San Luis Rey WWTP/SRTTP	300	2,477	1,130	3,907
	G	San Luis Rey WWTP – AWT (Potable Reuse)	0	2,240	3,360	5,600
		Subtotal	300	4,717	4,490	9,507
Olivenhain MWD	N/A	Meadowlark WRF ¹	1,000	0	0	1,000
	H	San Elijo WRF/Gafner WRF	100	300	0	400
	H	San Elijo WRF – AWT (Potable Reuse)	0	1,100	1,030	2,130
		Subtotal	1,100	1,400	1,030	3,530
Rincon del Diablo MWD	I	HARRF	3,279	500	0	3,779
	I	HARRF – AWT (Potable Reuse)	0	200	0	200
	J	Harmony Grove WRF	0	220	0	220
		Subtotal	3,279	920	0	4,199
Santa Fe ID	K ³	San Elijo WRF/Gafner WRF	510	40-729	0	550-1,239
	K ³	San Elijo WRF – AWT (Potable Reuse)	0	0-1,100	1,030	1,030-2,130
		Subtotal	510	729-1,140	1,030	2,269-2680
Vallecitos Water District	L	Carlsbad WRF	0	0	454	454
	M	HARRF	0	574	922	1,496
	N	Meadowlark WRF	0	0	416	416
	N	Meadowlark WRF – AWT (Potable Reuse)	0	1,100	1,100	2,200
		Subtotal	0	1,674	2,892	4,566
Vista Irrigation District	O	San Luis Rey WWTP/Carlsbad WRF	0	255	2,600	2,855
		Subtotal	0	255	2,600	2,855
Total Additional Demand for Proposed Project³			10,453	18,341	15,077	43,871
Total Cumulative Demand for Proposed Project³			–	28,794	43,871	

¹ These connections are not included within the groupings, because while they have existing recycled water demands, which are included in the total recycled water flows for the Coalition, there are no future recycled water demands or associated recycled water facilities for these entities for purposes of the Proposed Project.

² San Elijo JPA is a wastewater Coalition member that owns and operates distribution pipelines within the San Dieguito Water District service area.

³ Santa Fe ID will implement either 1,100 AFY of potable reuse at the San Dieguito Reservoir or 689 AFY of recycled water to meet demands in the eastern service area for Group K. Both projects will not take place in the short-term, so total demands for Group K and total demands associated with the Proposed Project are shown as ranges assuming only one of the Group K projects will move forward. Total demands presented within this document assume that the larger (1,100 AFY potable reuse) project is implemented.

Source: NSDWRC, 2015, NSDWRC Regional Recycled Water Project Program Environmental Impact Report, April, Prepared by RMC Water and Environment – Table 2-5 amended to reflect updates in Carlsbad MWD demand projections.

**Table 2-16: Water Treatment Plant Expansions for
North San Diego Water Reuse Coalition (NSDWRC) Regional Recycled Water Project**

Coalition Member/ Owner	Treatment Plant	Existing Treatment Capacity (MGD)			Required Treatment Capacity (MGD) By 2025			Required Treatment Capacity (MGD) By 2035		
		Secondary	Tertiary	Advanced	Secondary	Tertiary	Advanced	Secondary	Tertiary	Advanced
Carlsbad MWD	Carlsbad WRF	--	4.0	--	--	7.0	--	--	7.0	--
Leucadia WWD	Gafner WRF	--	1.0	--	--	2.5	--	--	3.7	--
City of Escondido	HARRF	18.0	8.0	--	21.0	18.0	0.2	27.5	25.0	0.2
	Escondido AWTF	--	--	--	--	--	2.0	--	--	2.0
City of Oceanside	San Luis Rey WWTP	13.5	0.7	--	13.5	6.5	2.0	17.4	13.5	5.0
Rincon del Diablo MWD	Harmony Grove WRF	--	--	--	0.2	0.2	--	0.2	0.2	--
San Elijo JPA	San Elijo WRF	5.3	3.0	--	5.3	3.5	2.0	5.3	4.5	3.8
Vallecitos WD	Meadowlark WRF	5.0	5.0	--	5.0	5.0	1.0	7.0	7.0	2.0
TOTAL		41.8	21.7	0.0	45.0	42.7	7.2	57.4	60.9	13.0

1 Max month tertiary demands from San Luis Rey WWTP may exceed average daily flow in the long term scenarios; recycled water supply may need to be supplemented during these months.

Source: NSDWRC, 2015, NSDWRC Regional Recycled Water Project Program Environmental Impact Report, April, Prepared by RMC Water and Environment – Table 2-16 amended to reflect updates in Carlsbad MWD treatment projections.