

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, M.S. 242
SAN DIEGO, CA 92110
PHONE (619) 688-0100
FAX (619) 688-4237
TTY 711
www.dot.ca.gov



*Flex your power!
Be energy efficient!*

April 8, 2013

Mr. David Gibson
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Ste. 100
San Diego, CA 92123-4340

Dear Mr. Gibson:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the TMDL for Toxic Pollutants in Sediment at the Mouths of Paleta, Chollas, and Switzer Creeks in San Diego Bay. Caltrans supports the San Diego Regional Board's efforts to improve the water quality in these water bodies and in San Diego Bay. Caltrans previously submitted comments to the Regional Board in October 2008, requesting several changes to the TMDL and would like to thank the Regional Board for addressing those comments. Caltrans has reviewed the revised TMDL and Basin Plan Amendment (BPA) and has concerns in the following areas:

General Comments

1. Detection Limits

Caltrans is concerned with the low numeric targets in the TMDL. For example, the numeric sediment target of 2.1 $\mu\text{g}/\text{kg}$ for Chlordane is far below current laboratory detection limits of 25 $\mu\text{g}/\text{kg}$. As a result, we may not be able to demonstrate compliance and may therefore be subject to enforcement actions or third party lawsuits.

Caltrans recommends the numeric sediment target be revised to reflect the current laboratory detection limits. Alternatively, Caltrans recommends that determination of compliance account for the current laboratory detection limits.

2. Alternative Compliance Schedule

Caltrans requests that the load reduction target milestones for this TMDL be extended. There is currently no proven technology that can effectively treat the organic pollutants listed in this TMDL. To allow additional time to identify effective best management practices (BMPs), we request that the 80% target be extended to 15 years rather than 10 years from the effective date of the Basin Plan

Mr. David Gibson
April 8, 2103
Page 2

Amendment. This is consistent with the Los Peñasquitos Lagoon Sediment TMDL in the region. Applying a uniform approach to compliance would better enable the stakeholders (dischargers) to achieve these waste load allocation (WLA) targets in a timely manner. We encourage Regional Board staff to coordinate the compliance schedule for similar TMDLs developed in the Region.

Caltrans requests that the compliance schedule to achieve 80% WLA be extended to 15 years.

3. Load Reduction Plan Development.

Caltrans requests that the deadline for submittal of the load reduction plan be extended. Extending the deadline to 18 months would be consistent with other TMDLs in the region, such as the Los Peñasquitos Lagoon Sediment TMDL. Caltrans may consider coordination with other stakeholders to develop the plan, and the extension would allow the responsible parties sufficient time to coordinate.

Caltrans recommends that the Load Reduction Plan development timeframe be expanded to 18 months.

We hope these comments are helpful. If you have any questions or concerns, please contact Con Kontaxis at (619) 688-3626.

Sincerely,



BRUCE L. APRIL
Deputy District Director, Environmental

Cc: Joyce Brenner, Keith Jones
Department of Transportation Headquarters, Division of Environmental Analysis

Con Kontaxis
Department of Transportation, District 11.