

**VIA EMAIL**

August 16, 2017

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814

Subject: Comment Letter–Bacteria Provisions

Dear Ms. Townsend:

The San Diego Unified Port District (District) appreciates the opportunity to provide comments in response to the Proposed Part 3 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (ISWEBE) – Bacteria Provisions and a Water Quality Standards Variance Policy; as well as the Proposed Amendment to the Water Quality Control Plan for Ocean Waters of California (Ocean Plan) – Bacteria Provisions and a Water Quality Standards Variance Policy (Bacteria Provisions).

As the public trustee of San Diego Bay (Bay), the District shares a common interest with the State Water Resources Control Board (State Board) in ensuring the protection of the Bay's beneficial uses. The District supports the State Board's continued efforts to address water quality issues. Our team's work on water quality improvements within the Bay includes executing Water Quality Improvement Plans and the implementation of the MS4 permit. To this end, the District respectfully submits the following comments regarding the ISWEBE and Ocean Plan Bacteria Provisions.

1. **The District is in support of the comment letter submitted by the County of San Diego (County) on behalf of the San Diego Copermittees.** The District is consistent with the County and is supportive of the State's efforts to align recreational water quality standards with the United States Environmental Protection Agency's (USEPA) 2012 Recreational Water Quality Criteria. The District supports the concepts discussed in the County's comment letter, such as (but not limited to) the need for a more in-depth description of the risk-based approach, seasonal considerations to objectives and the application of the reference reach/antidegradation approach to all waterbodies and calculations.

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RE: **Comment Letter-Bacteria Provisions**

2. The District suggests including language that addresses specific minimum sampling frequency requirements when calculating the rolling geomean for *E. coli* and Enterococci. A defined sampling frequency minimum will help standardize analyses across the state. A standardized approach may assist in clearly defining listing and delisting policies under California's Clean Water Act Section 303(d) Listing Policy for impaired water bodies. **As such, in the third paragraph under "Enterococci" on page 3, the District suggests the following edit (new text added/~~removed text~~):**

- a. To determine attainment of the *E. coli* and enterococci BACTERIA WATER QUALITY OBJECTIVES, the GEOMETRIC MEAN values shall be applied based on a statistically ~~sufficient~~ significant number of samples, which is ~~generally~~ not less than five samples equally spaced over a six-week period. If a statistically ~~sufficient~~ significant number of samples are not available to calculate the GEOMETRIC MEAN, then attainment of the water quality standard shall be determined based on the STV.

The District supports the State Board's efforts toward the protection of beneficial uses and is committed to our respective agencies' shared goal of improving the recreational water quality in San Diego Bay. The District greatly appreciates the State Board's on-going work and looks forward to continued collaboration on programs and initiatives that assist in water quality protection throughout the Bay, which, in turn benefits all residents and visitors alike.

If you have any questions or would like additional information related to the comments submitted herein, please contact Kelly Tait, Senior Environmental Specialist, Environmental Protection Department, at (619) 686-6372 or via email at ktait@portofsandiego.org.

Sincerely,



Karen Holman
Director, Environmental Protection
Planning and Green Port

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cc: Jason H. Giffen, Assistant Vice President, Planning and Green Port
John Carter, Deputy General Counsel