



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. John Robertus
Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4353

RE: Investigation Order R9-2006-076 (WQS:79-0058; WC)

Dear Mr. Robertus:

The U.S. Environmental Protection Agency has reviewed the above-referenced investigation order and we support its prompt implementation to assist in collecting monitoring data needed to assist TMDL development for several watersheds in the San Diego Region. We understand that the Regional Board will hold a hearing on October 11, 2006 to consider requests by affected parties to delay implementation of the monitoring work required by the order for a year or more.

Regional Board staff began work on TMDLs for the lagoons and their tributary waters in 2001 and committed to prepare draft TMDLs for initial public review in 2005.¹ In 2004-2005, the project was redesigned to address a broader group of pollutants. The current year State-Federal grant workplan for 2006-2007 includes commitments to move forward with TMDL development for these lagoons in accordance with the project redesign, and we understand Regional Board staff plan to complete the TMDLs in 2009.

We are concerned about the substantial delays in this project to date and cannot support additional project delays that would occur if the necessary monitoring work is further delayed. We also do not believe that a year's further delay would be warranted. The investigation order was issued in July, 2006, which provided sufficient lead time (more than 15 months) to plan and execute the needed monitoring work beginning in October, 2007. Additional project delays may place further federal funding for these projects, and for San Diego Region's TMDL program overall, at risk for future EPA grant funding. We urge the Regional Board to retain the monitoring implementation dates included in the existing order and continue TMDL development on schedule.

¹ This commitment was contained in the 2004-2005 Integrated TMDL Workplan, funded in part by federal grant funds.

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Thank you for your continued efforts to develop effective TMDLs for waters in the San Diego Region in accordance with the State-EPA workplan. If you have questions concerning these comments, please call me at (415) 972-3572 or David Smith, TMDL Team Leader, at (415) 972-3416.

Sincerely yours,

 18 Sept. 2006
Alexis Strauss, Director
Water Division

cc: Julie Chan, SDRWQCB
Ken Harris, SWRCB