



**VIA EMAIL**

August 24, 2017

Michelle Santillan  
San Diego Regional Water Quality Control Board  
2375 Northside Drive  
San Diego, CA 92108

Subject: **REC-1 Triennial Review Project- Cost Benefit Analysis**

Dear Ms. Santillan:

The San Diego Unified Port District (District) appreciates the opportunity to provide comments in response to the Cost-Benefit Analysis: San Diego Region Bacteria Total Maximum Daily Loads. As the public trustee of San Diego Bay (Bay), the District shares a common interest with the San Diego Regional Water Quality Control Board (Regional Board) in attaining swimmable waters at all beaches and ensuring the protection of the Bay's beneficial uses. The District supports the Regional Board's continued efforts to address water quality issues as we continue to work towards water quality improvements within the Bay through our numerous environmental protection programs. To this end, the District respectfully submits the following comments regarding the Cost-Benefit Analysis.

- 1. The District supports the Regional Board's efforts to produce an unbiased evaluation of both the costs and benefits of varied implementation methods that may assist in achieving wet weather numeric targets defined in the 20 Beaches and Creeks Bacteria Total Maximum Daily Load (TMDL).** Further, the District agrees with the language in the Executive Summary that highlights the importance of considering additional information beyond the results of the Cost-Benefit Analysis as well as the process to seek stakeholder input when considering important policy or management decisions.
- 2. The District recommends the Regional Board evaluate all Bacteria TMDLs in the same manner as the 20 Beaches and Creeks TMDL.** It is important to consider applying positive Cost-Benefit Analysis findings to additional Bacteria TMDLs where possible, as findings may be helpful to other bacteria programs' efforts to achieve numeric targets.



August 24, 2017  
San Diego Regional Water Quality Control Board  
RE: **REC-1 Triennial Review Project- Cost Benefit Analysis**

The District supports Regional Board efforts towards the protection of beneficial uses and is committed to our agencies' shared goal of improving the recreational water quality in San Diego Bay. The District greatly appreciates the Regional Board's efforts and looks forward to continued collaboration on programs and initiatives that assist in the protection of water quality throughout the Bay.

If you have any questions or would like additional information related to the comments submitted herein, please contact Kelly Tait at (619) 686-6372 or via email at [ktait@portofsandiego.org](mailto:ktait@portofsandiego.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Karen Holman". The signature is fluid and cursive, with a large initial "K" and "H".

Karen Holman  
Director, Environmental Protection  
Planning and Green Port

KH:te

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