



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

February 4, 2015

Submitted via email to: sandiego@waterboards.ca.gov

Mr. David Gibson, Executive Officer
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Attention: Ms. Michelle Mata

Dear Mr. Gibson:

Re: 2014 Triennial Review Comments

On behalf of the Municipal Separate Storm Sewer System (MS4) Permittees in the Santa Margarita Region of Riverside County, the Riverside County Flood Control and Water Conservation District (District) is pleased to submit the following comments for consideration in the 2014 Triennial Review of the Water Quality Control Plan for the San Diego Basin (Basin Plan).

Issue No. 1: Biological Objectives for Waterbodies in the San Diego Region – The development of biological water quality objectives for inland surface waters should consider the types of conveyance (i.e., engineered vs. natural). It would be unreasonable to expect engineered systems to respond or provide the same level of biological characteristics as natural systems. Biological objectives should only apply in natural systems where adequate flow exists to support the beneficial uses. As MS4 programs move to eliminate dry weather flows it will be unrealistic for non-perennial systems to support such objectives in the absence of water.

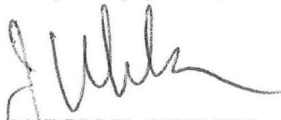
Issue No. 2: Evaluation of Contact Water Recreation (REC-1) Water Quality Objectives and the Methods for Quantifying Exceedances – The District supports establishing alternative bacteria standards based on use frequency and high flow thresholds for certain REC-1 waterbodies. While bacteria standards are set at stringent levels to protect the most sensitive beneficial use of a particular waterbody, the presence of dangerous high flows in waterbodies or waterways often do not support full body contact or immersion of a REC-1 beneficial use in wet weather events.

The 2011 Basin Plan Review included a "short list" item regarding Nutrient Water Quality Objectives in Surface Waters. The purpose of this item was to establish water quality objectives for nitrogen and phosphorus that take into account natural background levels, using the Numeric Nutrient Endpoint (NNE) framework to inform the process. The Santa Margarita Watershed Nutrient Initiative – Stakeholder Advisory Group (Nutrient Initiative Group) was created to ensure transparent and equal participation by multiple stakeholders in the assessment and possible refinement of the nutrient water quality standards in the watershed. To promote the work of the Nutrient Initiative Group, we request the San Diego Water Board allocate staff time to engage this effort and recommend that the scope of

alternative approaches be expanded beyond the NNE framework so as to facilitate consideration of other emerging/innovative approaches considered by the Nutrient Initiative Group.

The District appreciates the opportunity to provide written comments and supports the agency's intent of making Basin Plan goals more reasonable and attainable while being protective of water quality. If further information is required, please contact Art Diaz of my staff at 951.955.8602/aadiaz@rcflood.org or me at 951.955.1273/juhley@rcflood.org.

Very truly yours,



JASON E. UHLEY
Assistant Chief Engineer

ec: Santa Margarita Region Permittees

AD:cw
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