



Emailed to: sandiego@waterboards.ca.gov
San Diego Regional Water Quality Control Board (RWQCB)
2375 Northside Drive, Suite 100
San Diego, CA 92108
Attention: Ms. Michelle Mata
January 26, 2015

RE: Triennial Review Comment

I am sending this comment letter to express support for the selection of "Evaluation of Contact Water Recreation (REC-1) Water Quality Objectives and the Methods for Quantifying Exceedances" for inclusion in the 2015 triennial review.

This issue has significant implications for jurisdictions subject to municipal stormwater permits and the bacteria Total Maximum Daily Load (Bacteria TMDL) regulation (R9-2010-0001). Load reduction plans have been completed to comply with the requirements of the TMDL, with modeling being conducted to assess what is required to achieve compliance. It has become apparent during that process that complying with the TMDL, particularly during wet weather, or periods of rainfall that do not meet the definition of a wet weather event (less than 0.2 inches) will be challenging and expensive. This was expressed by the regulated community during the adoption of the TMDL and during the adoption of the San Diego municipal stormwater permit (R9-2013-0001).

In addition there has been substantial research into the sources of fecal indicator bacteria and its behavior in the environment, particularly its potential to regenerate independent of mammalian bodies. Better methods to assess human health risks to pathogens in receiving waters have also been developed, but these currently cannot be used to assess compliance with the bacteria TMDL.

The parties subject to the Bacteria TMDL have been proactive in developing a project to assess bacteria levels in "reference watersheds" to better understand what standards the Bacteria TMDL should be achieving. This has required the investment of significant resources by jurisdictions that already have funding challenges with the expectation that this data will be used in re-evaluating the load reductions required by the Bacteria TMDL. These efforts were made in good faith and the project involved the participation of RWQCB staff, as well as representatives from San Diego Coastkeeper to ensure that concerns of other stakeholders were appropriately addressed. It is hoped that the findings of this study are comprehensively incorporated into this review.

Achieving water quality that is "Safe to Swim" is a goal that is important to the San Diego Region. However that standard needs to properly reflect the risk. Also the cost to attain that standard should be understood and accepted by the community.

Thank you for the opportunity to comment on the priorities of the 2015 Triennial Review. Please contact me at (760) 839-6315 if you have any questions about this letter.

A handwritten signature in blue ink that reads "Helen M. Davies". The signature is written in a cursive style with a horizontal line underneath the name.

Helen M. Davies, M.S., CPSWQ
Environmental Programs Manager