



THE CITY OF SAN DIEGO

January 14, 2015

Electronic Submission: 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

Subject: Comment Letter – Triennial Review

Dear Mr. Gibson:

Protecting and improving water quality in compliance with our storm water quality regulations is a priority for the City of San Diego (City). To ensure that the substantial efforts required by the regulations are effectively and efficiently improving water quality and protecting human health, it is also imperative that the regulations are based on the best available science. For this reason, the City supports the Regional Board's selection of highest priorities for the Draft 2014 Triennial Review and has dedicated resources to advance all three priority issues. Specifically, the City supports priority issues number one, two and three in the Draft 2014 Triennial Review, which address biological objectives, the Chollas Creek Dissolved Metals Total Maximum Daily Load (TMDL), and the Bacteria TMDL. More detailed comments on the Draft 2014 Triennial Review are provided below.

- *The City supports Issue No. 2, which includes an amendment to the San Diego Basin Plan to incorporate site specific data collected by the City into the Chollas Creek Dissolved Metals TMDL. Our staff and consultants collected monitoring data to better characterize the water quality characteristics and associated site-specific bioavailability of dissolved metals in Chollas Creek. These efforts have greatly advanced our understanding of the receiving water dynamics and processes in this important watershed using the EPA-approved Water-Effects Ratio (WER) approach.*
- *The City supports Issue No. 3, with some modifications, which includes analysis of the water quality objectives and TMDLs related to bacteria. Since 2001, the City has initiated and completed important studies helping to better characterize bacteria levels in the receiving waters, identify sources of bacteria, and to assess the water quality regulations that affect the City's compliance approach to the Bacteria TMDL. This work has provided the Board with critical and scientifically valid information that should be used in the Triennial Review effort. The City believes that all of this work can help guide*



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the Triennial Review effort and will give the Board the ability to generate more accurate and valuable data regarding receiving water conditions. Therefore, the City requests that the Draft 2014 Triennial Review make a clear and firm commitment to considering amendments to the Bacteria TMDL if the evaluation process described in Issue No. 3 demonstrates that modifications are warranted.

We look forward to working with you and all the Regional Board staff involved in the Triennial Review effort. We are ready to provide the Regional Board with the resources to further refine the scientific basis of its review, including regional and national experts familiar with broader watershed regulation and compliance mandates. The City hopes that the Regional Board will, in exchange, allocate the staff resources necessary to undertake all three Basin Planning issues during this triennial review period.

If you have additional questions, please contact Ruth Kolb at (858) 541-4328 or at rkolb@sandiego.gov.

Sincerely,



Kris McFadden
Director

cc: Mike Hansen, Director of Land Use and Environmental Policy, Office of the Mayor
Tony Heinrichs, Deputy Chief Operating Officer, Infrastructure/Public Works
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