



County of San Diego

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August 6, 2018

San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108
Attn: Ms. Jody Epsen

Dear Ms. Epsen:

TRIENNIAL REVIEW COMMENTS: CW845836

The contents of this letter are the same as submitted on May 16, 2018. The County of San Diego has resubmitted the letter so that the letter will be part of the Administrative Record. The County of San Diego appreciates the opportunity to provide comments on the preliminary list of proposed project descriptions for the 2018 Triennial Review of the Water Quality Control Plan for the San Diego Basin. As one of the largest jurisdictions regulated under the San Diego Municipal Stormwater Permit, the County is very interested in water quality regulations that are reasonable, founded upon sound science, and that move our region forward by improving water quality in a productive and responsible way.

Contact Water Recreation (REC-1) Water Quality Objectives

The County fully supports the inclusion of the project *Contact Water Recreation (REC-1) Water Quality "Bacteria TMDL"* as a top priority (Tier 1) for the 2018 Triennial Review. The County has been actively collaborating with Regional Water Board staff on the 2014 Triennial Review project related to the same topic and supports action to incorporate into the Bacteria TMDL, the new science and information acquired through several locally funded studies, such as the Surfer Health Study and Cost-Benefit Analysis. We also support inclusion of the USEPA 2012 Recreational Criteria as an update to the REC-1 water quality objectives. Evaluating bacteria standards and corresponding TMDL changes are a top priority for the County of San Diego. The County strongly encourages the Regional Water Board's support of the timely completion of these projects. Because the deadlines for compliance with the TMDLs are rapidly approaching, it is critical to incorporate the latest scientific information into the TMDL now, rather than waiting until after the Investigative Order for San Diego River. The County will continue to support this project in any way possible to facilitate the evaluation of bacteria standards and TMDL changes. The County proposed specific changes to the Bacteria TMDLs as part of the Report of Waste Discharge submitted in December 2017. We look forward to reviewing Regional Water Board staff's

recommended changes to the TMDL, as well as subsequent Water Board workshops and hearings on this topic.

Tijuana River Valley Water Quality Restoration

The County supports the 2018 Triennial Review Project "*Tijuana River Waters Valley Water Quality Restoration*" if the focus of the proposed project is to address the water quality of transboundary flows into the Lower Tijuana River Valley. The County recommends that language be added to clarify that the development of the TMDL would acknowledge the cross-border component and role and responsibility of the federal government. Although we support this project, the County should not be assigned waste load reductions in any future TMDLs developed for the Tijuana River Valley.

We share with you the goal of clean water in the San Diego Region, and we look forward to continued collaboration on the Triennial Review projects. Please contact me at (858) 694-3672 or todd.snyder@sdcounty.ca.gov if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Snyder". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

TODD E. SNYDER, Manager
Watershed Protection Program