

July 20, 2018

San Diego Regional Water Quality Control Board
2375 Northside Drive,
Suite 100 San Diego, CA 92108
Attn: Jody Ebsen
sandiego@waterboards.ca.gov

Sent via email

Re: Triennial Review Comment: CW845836

Dear Ms. Ebsen:

Thank you for the opportunity to comment on the Triennial Review of the Water Quality Control Plan for the San Diego Basin, Draft Staff Report and Prioritized List (Draft List). Please accept these comments on behalf of San Diego Coastkeeper (Coastkeeper). Coastkeeper is a non-profit organization working to protect and restore the San Diego region's bays, beaches, watersheds, and ocean.

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) shares this goal. The Mission Statement of the San Diego Water Board is to develop and enforce water quality objectives and implementing plans that will best protect the area's waters while recognizing our local differences in climate, topography, geology and hydrology. The comments provided below are intended to assist the San Diego Water Board with developing Triennial Review projects that will achieve our common goal of improving water quality in the San Diego Region.

Coastkeeper's main concern with the Draft List is the extremely limited resources available to the San Diego Water Board to administer the Basin Plan and implement Triennial Review Projects (2 person-years [PYs] per year). The Draft List should be limited to projects that have the highest likelihood of improving water quality with the available resources. To that end, Coastkeeper has the following comments.

Project 1: Tijuana River Valley Water Quality Restoration Should be the Highest Priority Project and be Allocated the Bulk of the PYs Allocated to Basin Plan and Triennial Review Project

Coastkeeper agrees that the restoration of the Tijuana River Valley should be the highest priority project and requests that sufficient resources be directed to this Project to ensure successful completion. The San Diego Water Board is well aware of the need to address the public health risks and environmental damage that have resulted from the discharges of waste from Mexico. Significant political and regulatory momentum has been generated

over the past year to address and resolve this issue, and Coastkeeper is pleased that the San Diego Water Board is committed to keep moving in the direction to restore this important waterbody so that the Public may enjoy Key Beneficial Uses of the Tijuana River Valley.

Project 2: Biological Objectives for Water Bodies in the San Diego Region is Properly Listed as the Second Priority and Sufficient Resources Should be Allocated to this Project to Ensure that the Public Hearing is Conducted Between July and December 2018

Coastkeeper again wishes to reiterate our strong support the inclusion of biological objectives (BOs) into the Triennial Review and as a Basin Plan amendment. BOs will provide the San Diego Water Board and Dischargers the tool to identify impaired water bodies, the causes of the impairment, and the most effective means to restore the water body.

For the first forty-plus years of the Clean Water Act's implementation, regulators and the public alike have largely focused on the chemical integrity of our waters. This, despite the first sentence of the Act itself stating that, "the objective of this Act is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."¹ We believe the addition of both narrative and numeric biological objectives to the assessment of our waters' health is long overdue.

Coastkeeper is supportive of a scheme in which BOs complement and coexist with the existing objectives that are currently in the Basin Plan. Existing chemically-focused objectives will continue to protect and restore those beneficial uses for which BOs are not the best indicator or measure. Both on their own and alongside existing objectives, BOs serve to tell a more complete story over time of our region's water body health and the health of the aquatic life within those waters.

BOs are able to give us a more complete picture of the ecological health of our streams because BOs integrate both chemical and physical stream parameters into an objective score. And because BOs integrate data over time we are given a better understanding of the health of our waters than chemical objectives, which merely give an instantaneous snapshot of a waterbody's health.

Coastkeeper looks forward to continuing to work with the Regional Board during the development of BOs in our region.

¹ 1 33 USC 1251 Section 101

Project 3: Contact Water Recreation (REC-1) Water Quality Objectives Should be Removed from the Draft List

Coastkeeper remains supportive of Regional Board action aimed at identifying sources of REC- 1 impairment, including human bacteria inputs, and addressing those sources through Investigative Orders, enforcement actions, and amendments to TMDLs to include wastewater agencies contributing to impairments through exfiltration. To the extent that this proposed project aims to accomplish that goal alone, we are supportive.

We do not, however, support region-wide or site-specific Basin Plan amendments to REC-1 objectives or amendments to how those water quality objectives are assessed. We respectfully request removal of review of REC-1 water quality objectives and/or implementation plans, as we do not believe there exists sufficient data to support such amendments. We also note the State Water Board is in the process of amending REC-1 standards statewide and we believe any local actions do to so would be duplicative, an inefficient use of local Regional Board staff resources, and unnecessary.

Project 4: Climate Change Readiness: Sustainable Local Water Supply Should be Removed from the Draft List

Due to the lack of sufficient resources this Project should be removed from the list. The San Diego Water Board acknowledges that available resources “are not expected to be sufficient to lead and complete this Project within the next three years” and suggests that resources from the South Orange County Water Authority (SOCWA) and the San Diego County Water Authority (SDCWA) could be used to engage in a collaborative approach to this Project. The Draft List does not state that such agreements have been made or forthcoming. This lack of resources and/or outside funding dictates that this Project should be removed from the Draft List.

While Coastkeeper is supportive of the San Diego Water Board’s commitment to reduce the Region’s use of imported water, we are concerned the Board is considering weakening water quality objectives to achieve this goal. As a reminder, the Mission Statement of the San Diego Water Board is to **develop and enforce water quality objectives and implementing plans that will best protect the area's waters** while recognizing our local differences in climate, topography, geology and hydrology. Any proposed weakening to the existing water quality objective for total dissolved solids must still be protective of the basin’s surface water and groundwater to meet the designated beneficial uses of those waters.

Sincerely,



Matt O'Malley
Executive Director & Managing Attorney

/s

Barry Pulver
Volunteer, Regulatory Affairs