



April 13, 2018

Regional Water Quality Control Board  
Attention: Roger Mitchell #656543:RMitchell  
2375 Northside Dr. Ste. 100  
San Diego, CA 92108

**Subject:** Comment on Administrative Draft Investigative Order R9-2018-0021

Upon review of the Administrative Tentative Investigative Order, the City of La Mesa has the following comments:

**1. The July 1, 2018 work plan due date is too soon to formulate a work plan strategy and complete a work plan.**

There may be considerable administrative work on the front end of this project. Depending on currently unknown variables regarding the tentative I/O and development of the work plan, we suggest a work plan due date of 1 year following any final I/O approval date.

**2. Quantifying loading rates from homeless encampments is not feasible. Additionally, jurisdictions have different geographical locations in the watershed and capacity to address and/or assess San Diego River encampments.**

The City of La Mesa contains channel sections upstream of Alvarado Creek, much of which is concrete box culvert, areas within Caltrans right of way, or private property. No portions of the City of La Mesa are located on the San Diego River.

We suggest that the language in the I/O be altered to reflect reasonable jurisdictional goals regarding studying this homeless issue. The study should attempt to assess the magnitude of the issue based on broad spatial observations, and comparison with water quality monitoring.

Obtaining loading rates from homeless encampments is not feasible to obtain, nor is it reasonable to require any jurisdiction to calculate loading or investigate encampments outside of their jurisdiction.

We suggest that language within the I/O regarding homeless encampments be re-written, indicating that it is implied that calculating loading rates directly from homeless encampments will not be required, and that an alternative analysis attempting to address the magnitude of the issue as a whole pertaining to the human sources problem shall be sufficient.

**3. Methodology regarding quantifying loading rates from exfiltration from public and private sewers is unknown.**

The City of La Mesa understands the intent of the I/O to investigate the sources of human based pathogens pertaining to sewer exfiltration. Unfortunately, there is no suggested methodology toward obtaining meaningful data including human pathogen loading rates directly from these systems.

A study on individual sewer lines and extrapolating data across the SDR Basin will require multiple levels of assumptions, and we fear that the end results of a costly study will not represent anything worthwhile other than a validation that yes, exfiltration can occur within the joints of old sewer systems, and with a loading rate that may not have any bearing on reality.

We suggest that the I/O be modified to eliminate the requirement for calculating a loading rate stemming from exfiltration of public and private sewer systems. Instead, the I/O should allow for a more broad based analysis comparing pipe conditions/locations and water quality monitoring data, or similar. This type analysis is scoped more in reality and would yield reasonable conclusions; rather than an inaccurate data crunching exercise at taxpayer's expense.

**4. Semi-annual reporting is not necessary for accurate progress tracking.**

The City of La Mesa is a small jurisdiction with very limited staff and funding. The City currently has an extra ordinary amount of reporting requirements for a City of its size. Straddled on 2 major watersheds, the City has a multitude of Jurisdictional, WQIP, TMDL, Trash, San Diego Bay and River I/O reporting requirements. We recommend changing the I/O reporting requirements to annual.

Sincerely,  


Joe Kuhn  
Storm Water Program Manager  
City of La Mesa