

Mitchell, Roger@Waterboards

From: Kolb, Ruth <RKolb@sandiego.gov>
Sent: Friday, April 13, 2018 7:46 AM
To: Mitchell, Roger@Waterboards
Cc: McFadden, Kris; Bienes, Vic; Amen, Rania; Vroom, Peter; Rashid, Surraya; Generoso, Agnes; Widgerow, Davin; Gavaldon, Alejandra; Lamb, Barbara; Walsh, Laurie@Waterboards
Subject: City of San Diego Informal Comments Regarding Draft Tentative Order R9-2018-0021

Hi Roger,

The City of San Diego (City) appreciates the San Diego Water Board's (Water Board) consideration of our comments regarding Draft Tentative Order No. R9-2018-0021.

1. Request the Bacteria TMDL schedule be revised because some TMDL milestones will pass before the human source study is completed in four years. These studies will provide important information that includes the investigation of homeless individuals and their impact on water quality to assist with implementation methods. A finding should be included that states the purpose of the Investigative Order (IO), and how the Water Board intends to use the information and data gathered, including data related to homeless, to determine compliance or other actions.
2. Acknowledge the City of San Diego's efforts to minimize the effects of human bacteria from homeless individuals. Homeless is a larger societal issue that covers many aspects beyond water quality and the storm drain system, and therefore, cannot be addressed solely through the Municipal Separate Storm Sewer System (MS4) permit. Please clarify the connection between the MS4 Permit and this bacterial source. Please include all property owners in the IO along the San Diego River so all responsible parties are notified of the need to maintain their property.
3. Revise IO Directive 1(d) to allow for adaptive management within existing programs (i.e. WQIPs, SMPPs) instead of creating a duplicative reporting structure.
4. Please clarify the connection between public sewer system and private systems. Acknowledge the City's efforts to minimize the effects of human bacteria from private laterals. The City responds to all reported sewage spills regardless of size, or whether they're from a private or public sewer source. Recommend that all sewer agency data be normalized by the number of spills per 100 miles of sewer mains, so different sewer agency data are comparable. Additionally, only data from the San Diego River watershed should be used in the IO.
5. The reporting requirements for wastewater spills are inconsistent for the City of San Diego and other agencies. Currently the City reports all SSO's regardless the size or location (private and public) to conform to the WDR while other agencies only report SSOs greater than 1,000 gallons. The City's SSO statistics need to be recalculated for those over 1,000 gallons so the City's data are comparable to other agencies. We ask those recalculations and adjustments be made.
6. It is premature to issue this IO until the Water Board and collaborating agencies have developed the necessary statistically viable methodologies and proved technologies to accurately assess the loading from the different sources of human bacteria. A mid-point assessment of the statistical validity of results should occur. If results during the mid-point assessment appear inconclusive, the Water Board should work with agencies to revise/improve methodologies or decide whether the study may not provide conclusive data and should be scrapped.
7. Prior to issuance of the IO, the item needs to be agenzized for board consideration offering opportunity for public comment at the San Diego Water Board meeting.

The City appreciates your consideration of the concerns above. If you have questions, please contact me.
Ruth

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