

June 18, 2018

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

**Subject:** Comment on Tentative Investigative Order R9-2018-0021

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

**1. The January 7, 2019 work plan due date is too soon to formulate a work plan strategy and complete a work plan and initial CWM.**

The 6 month time frame is arbitrary and unrealistic.

Legal review, potential cost sharing and Memorandum of Understanding (MOU) development, and administrative task of scoping the project takes considerable time. A minimum of 1 year following any final I/O approval date is needed for work plan/study/initial CWM development.

**2. Semi-annual reporting is not necessary for accurate progress tracking. Please revise the Tentative Order to require Annual progress reports.**

Semi-annual reporting is overkill and will result in a costly, unnecessary, and nearly constant state of report scoping, preparation, and submittal.

The City of La Mesa is a small jurisdiction with very limited staff and funding. The City currently has an extra ordinary amount of NPDES related 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. Please change the I/O reporting requirements to annual.

**3. Quantifying loading rates and requiring a CWM with a detailed 3D spatial/temporal analysis and waste migration stemming from homeless encampments is not feasible or reasonable.**

We suggest that the language in the I/O be altered to reflect reasonable study 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.

**4. Methodology regarding quantifying loading rates from exfiltration from public and private sewers is unknown. Producing a CWM with 3D spatial/temporal analysis and waste migration pathways pertaining to sewer exfiltration is not feasible or reasonable.**

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 may occur within the joints of old sewer systems, and with a derived 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.

**5. The City of La Mesa should not be required to participate in the development of a study or CWM which requires addressing homeless encampment loading within the San Diego River.**

The San Diego River homeless encampment issue seems to be a central theme of this Tentative I/O.

The City of La Mesa has the ability to address homeless issues within the City limits only. Any I/O addressing any kind of homeless issues should be directed to the agency which is able to study/address the problem, not ancillary agencies without jurisdiction.

Sincerely,



Joe Kuhn  
Storm Water Program Manager  
City of La Mesa