



December 5, 2016

Ms. Christina Arias
San Diego Regional Water Quality Control Board
2375 Northside Dr. Ste 100
San Diego, CA 92108

Subject: Comment: Tentative Order R9-2016-0205

Ms. Arias,

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

1. Item 9 Section d discusses transient encampments within the San Diego River Watershed. The City of La Mesa requests that this topic be removed from the Tentative Order. Transient encampments involve legal issues that are much more complicated than the scope of this Tentative Order. Transient encampments involve property rights and human rights issues and often involve persons living within the designated waterbody. Litter from transients should be addressed identically to that of any other. Requiring additional plans for the San Diego River Watershed is not appropriate, as much of the issue revolves around persons living in the waterbody with significant legal and ethical hurdles regarding encampments.
2. The City of La Mesa does not dispute the water quality benefits of controlling trash, however, the amendments represent added costs, and may take away from other planned water quality efforts. Not only are we concerned with the initial cost of installing these full capture devices but also the ongoing costs of managing and maintaining them. The City of La Mesa recommends that the State and Regional Water Boards partner with permittees to explore possible ways to fund these trash control measures.

Thank you,

Joe Kuhn
Storm Water Program Manager
City of La Mesa