



THE CITY OF SAN DIEGO

**Item No. 15**  
**Doc. No. 3**

Electronic Submission: [VRodriguez@waterboards.ca.gov](mailto:VRodriguez@waterboards.ca.gov)

May 17, 2007

Vicente Rodriguez, Executive Officer  
San Diego Water Quality Control Board, Region 9  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123

Dear Mr. Rodriguez:

Subject: Reissue of Discharge of Groundwater Extraction Water to San Diego Bay

The City of San Diego appreciates the opportunity to comment on the Regional Board's proposals to re-issue General Waste Discharge Requirements for Groundwater Extraction Water, throughout the San Diego Region, including discharges into San Diego Bay.

I appreciate the fact that the Regional Board is proposing to give MS4 operators more control over these discharges; however, I believe that it is important that the Regional Board recognize the impact that these discharges could have on the growth of bacteria in storm drains.

The Regional Board is poised to adopt a bacteria TMDL for most of the areas covered by the two proposed Waste Discharge Requirements. Discharges of water that would be permitted via the proposed Waste Discharge Requirements have the potential to create breeding habitat for bacteria in storm drains. While the duration of the discharges addressed by the Waste Discharge Requirements is always temporary, I am aware of one application that has been submitted to allow a discharge for up to seven years.

Even though typical conditions imposed by the Regional Board are adequate to ensure that pollutants are reduced to appropriate levels prior to discharge to the MS4, the proposed regulations do not address the downstream bacteria breeding issue. Therefore, the City recommends that the Regional Board add conditions to the proposed treatment and monitoring requirements that would require the Groundwater Extraction Permittees to monitor for bacteria growth in the MS4 at an appropriate location downstream of their discharges. Detection of bacteria growth that would adversely affect the City's ability to comply with the bacteria TMDL should be included in the Waste Discharge Requirements as a situation that would result in revocation of the dischargers' coverage.



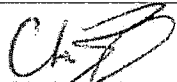
**Storm Water Pollution Prevention Program**

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Thank you again for the opportunity to comment. If you have any questions, please call Ruth Kolb at (619) 525-8636 or at [rkolb@sandiego.gov](mailto:rkolb@sandiego.gov).

Sincerely,



Chris Zirkle  
Deputy Director

CZ/ rk

Enclosure(s): 1. (Enclosure) If more than one, Identify by number

cc: File