WARREN D. WILLIAMS General Manager-Chief Engineer

> SAN DIEGO REGIONAL WATER OUALITY CONTROL BOARD



1995 MARKET STREET RIVERSIDE, CA 92501 951.955.1200 FAX 951.788.9965 www.floodcontrol.co.riverside.ca.us

2008 APR RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT April 24, 2008

Ms. Amy Mecklenborg San Diego Regional Water Quality Control Board 9174 Sky Park Court, Suite 100 San Diego, CA 92123

Dear Ms. Mecklenborg:

Re:

RSAA/NSEA Implementation

Provisions for Fecal Indicator Bacteria Comments on Proposed Basin Plan

Amendment

Thank you for this opportunity to comment on the proposed revisions to the Basin Plan Amendment establishing the RSAA and NSEA for Fecal Indicator Bacteria (FIB). The District has reviewed the document and would like to provide the following comments:

- 1. The District concurs with Orange County's comments.
- The District would like to see Section 5.3.3 conclude with the following statement: 2.

"The Water Quality Standards for Coastal and Great Lakes Recreational Waters is intended for use on waterbodies subject to the Beach Act. Inland water bodies are not subject to the requirements of the Beach Act. Further, due to limited recreational usage rates, there are limited opportunities to support site-specific epidemiological studies for inland waterbodies in the San Diego Region. For this reason, alternative and simplified approaches to demonstrating maintenance of health risks may need to be considered for inland waterbodies."

Please feel free to call me at 951.955.1273 if you have any questions or comments.

Very truly yours.

Doc Scanned On: 4 -29 -2008

S. Bourche Time: 2:35

Senior Civil Engineer

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