



Lori Vereker
Director of Utilities
201 North Broadway, Escondido, CA 92025
Phone: 760-839-5432 Fax: 760-839-4597

August 23, 2010

Mr. David Gibson
Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Subject: Request for extension of comment period on Tentative Order No. R9-2010-0086,
WDID: 9 000000031:jcofrancesco

Dear Mr. Gibson:

The City of Escondido is requesting an extension on the comment period for Tentative Order No. R9-2010-0086, NPDES Permit No. CA0107981. A significant change has been added to the permit which requires stringent review on our part. The change is the new requirement for bacterial characteristics (page 15, A.1) and the compliance schedule for this new requirement (pages 27 and 28, C.6). We are requesting at least another 30 days in order to complete our review of this requirement and the associated compliance schedule, and to review our ocean monitoring data to ascertain what may be required to comply. We would then need time to work with our engineering staff to determine if the compliance schedule is sufficient to determine what, if any, capital investment and operational changes may be necessary to comply. Given the possible implications of this change, we do not feel that a twenty-three day comment period is sufficient to do a thorough review.

Your consideration of this request is appreciated. If you have any questions please call me at 760-839-5432.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lori Vereker".

Lori Vereker
Director of Utilities

cc: James Smith, Assistant Executive Officer
Brian Kelley, Senior WRC Engineer
Mike Thornton, San Elijo Joint Powers Authority
John Burcham, Deputy Utilities Director, Wastewater