



THE CITY OF SAN DIEGO

August 31, 2012



Electronic Submission: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Draft Substitute Environmental Documents for Ocean Plan Amendments and Implementation of Resolutions 2010-0057 and 2011-0013

Dear Ms. Townsend:

The City of San Diego, Transportation & Storm Water Department (City) appreciates the opportunity to provide comments on the recent proposed revisions of the draft Substitute Environmental Document (SED) addressing Implementation of State Water Resources Control Board (State Board) Resolutions 2010-0057 and 2011-0013. This letter summarizes the key points related to recent red-line revisions in these two documents.

The shift toward receiving water monitoring for nearly all model monitoring requirements is greatly appreciated. The City feels this shift will provide accurate and valuable data with respect to impacts on the ocean receiving water from runoff. Additionally, this approach will allow the City to focus resources on determining ocean impacts, and efficiently use of resources assessing ocean water quality after mixing. This approach is in-line with the City's position on effective use of monitoring resources to address specific questions.

Table 2 of the draft Ocean Plan SED (page 43) reflects increased sampling and analysis cost estimates that are approximately more than double the original estimates. Although these estimates more closely reflect true costs, these estimates still seem low with respect to costs that include both sample collection and analysis. For example, the costs for bacteria are estimated at \$200 per sample, and toxicity costs are estimated at \$1,000 per sample. These costs are reflective of approximate analytical costs, and do not appear to include time for labor and vehicle usage. This suggests that costs will be greater than currently estimated. This difference in costs would have a significant increase, causing financial impacts to the City. We recommend documenting the basis of the costs estimates in the response to comments to determine if all factors were included in developing the cost estimate.

Transportation & Storm Water Department

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The City requests a written response from the State to comments in order to understand the nature of incorporation, or exclusion of our comments in the current documents. During the two previous proposed amendments comment periods, the City has provided written comments on October 21, 2011 and April 16, 2012. The current documentation stated that previous comments have been incorporated in the current documents; however, without a formal response to comments it is difficult to understand the State Board's position on our previous comments.

The City recommends a longer time frame between publication of revisions and comment letter due dates, in particular given that the upcoming workshop is scheduled just prior to the comment deadline. This modification would allow for comment letters to address the most current issues discussed at the workshop thereby providing the State Board with the most thoughtful and insightful comments based on State Board staff's presentations.

If you have additional questions, please contact Ruth Kolb at (858) 541-4328 or at rkolb@sandiego.gov.

Sincerely,



Kris McFadden
Deputy Director

KM/rk

cc: Almis Udrys, Deputy Director, Office of the Mayor
Garth K. Sturdevan, Director, Transportation & Storm Water Department
Ruth Kolb, Program Manager, Transportation & Storm Water Department