



November 30 2010

Charles Hoppin, Chair and Board Members
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Comments in Support of San Diego Water Board Indicator Bacteria, Project I

Dear Mr. Hoppin:

San Diego Coastkeeper (Coastkeeper) submits the following comments in support of adoption of the Revised Total Maximum Daily Loads (TMDLs) For Indicator Bacteria, Project I, adopted by the San Diego Regional Water Quality Control Board on February 10, 2010, under Resolution No R9-2010-0001. Coastkeeper protects the region's inland and coastal waters for the communities and wildlife that depend on them by blending education, community empowerment and advocacy.

Coastkeeper had an active role in the development of this TMDL for nearly eight years. We participated in the Stakeholder Advisory Group (SAG) since its inception and provided extensive input on the technical and policy details of this TMDL. We are eager to have the Basin Plan Amendment move forward so efforts can be focused on implementing actions that will improve water quality.

In our previous comment letter dated January 22, 2010 regarding Resolution No. R9-2010-0001 (hereby incorporated by reference) we raised numerous concerns, which primarily focused on the use of the reference system approach and the 22% allowable exceedance frequency. We do not wish the co-permittees to expend resources trying to treat or manage natural sources of bacteria. However, we do believe that without an appropriate local dataset to determine a realistic and local level of naturally derived bacteria, we will increase the risk of people being exposed to pathogens that could otherwise be controlled. The most precautionary approach would be to set a natural exceedance rate of 0% until a local dataset can be vetted. However, we are confident sufficient data will be collected in the near future, and look forward to working with staff to incorporate it appropriately. Additionally, we are still concerned about the long compliance schedule for this TMDL. The lengthy timeframe outlined by this TMDL will continue to put resident and tourist health at risk for too long.

The health and safety of our waterways is a cornerstone of the culture and economy of the San Diego region. Achieving the goals of this TMDL is critical to our region's vitality. We therefore urge the State Water Resources Control Board to adopt this resolution.

Sincerely,

Jennifer Kovacs

A handwritten signature in black ink, appearing to read "Jennifer Kovacs", written over a faint, larger version of the name.

Staff Scientist
San Diego Coastkeeper



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