



County of San Diego

BOARD OF SUPERVISORS

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470

February 6, 2015

Electronic Submission: sandiego@waterboards.ca.gov

David Gibson
Executive Officer
San Diego Regional Water Quality Control Board
2375 San Diego Northside Drive, Suite 100
San Diego, CA 92108

Re: County of San Diego – Triennial Review Comments

Dear Mr. Gibson:

As representatives of one of the largest jurisdictions under the San Diego Municipal Stormwater Permit, we are very interested in seeing regulations adopted that are reasonable, founded upon good science, and that move our region forward in improving water quality in a productive and fiscally responsible way.

We are encouraged to see that the evaluation of Issue #3, Evaluation of Contact Water Recreation Water Quality Objectives and the Methods for Quantifying Exceedances, also known as the “Bacteria TMDL,” and Issue #2, Chollas Creek Metals Site Specific Water Effect Ratio, also known as the “Chollas Creek TMDL,” are included on the Regional Water Board’s preliminary list of highest priority basin planning items.

Additionally, we are particularly pleased to see that a cost-benefit analysis is proposed as part of the scope of the Bacteria TMDL project. The County has made significant investments in studies that provide the data and information necessary to improve the science supporting the water quality standards used in the TMDLs. It is extremely important to commit to acting on the results of these scientific studies.

Again, we applaud the Regional Board and staff for their efforts to review issues #3 “Bacteria TMDL”, and #2 “Chollas Creek TMDL.” However, we would like to state our concern with Issue #1, Biological Objectives for Water Bodies in the San Diego Region, being included as a priority issue for evaluation. Our staff has expressed concern over the new biological objectives for inland streams and how they could create an additional multi-million dollar regulatory burden for our agency that would be unfunded and on top of existing standards.

As elected officials, we are stewards of taxpayer funds just as we are stewards of the environment. As you know, compliance with the Bacteria TMDL across the San Diego region has been estimated to cost between \$2.8 billion and \$5.1 billion over the next 16 years.

No funding has been provided to support compliance and the TMDL costs are in addition to the more than \$100 million in ongoing annual expenditures on municipal stormwater programs throughout the county.

Our primary concern is to ensure that current and future expenditures on stormwater management yield a corresponding return on investment in terms of public and environmental health. Triennial Review Issues #2 and #3 are important projects that should help address this return on investment concern; however, there are questions whether Issue #1 will achieve that same goal.

We share with you the goal of clean water, but ask that the Regional Board give strong consideration to the concerns that we have expressed in this letter and to the detailed technical letter that our staff has submitted that further elaborates on these concerns.

Sincerely,



GREG COX
Supervisor, First District
County of San Diego



RON ROBERTS
Supervisor, Fourth District
County of San Diego