



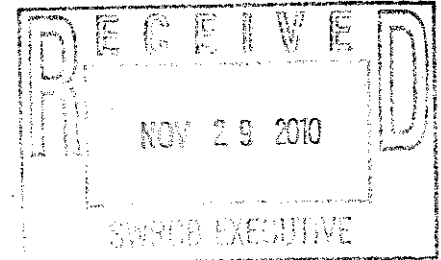
CITY OF  
**LA MESA**

JEWEL of the HILLS

**PUBLIC WORKS DEPARTMENT**

November 24, 2010

Janine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I St.  
Sacramento, CA 95812



**Subject: Comment Letter – San Diego Water Board Indicator Bacteria, Project I**

Upon review of the proposed Basin Plan amendment, the City of La Mesa has the following comment:

- 1. The definition of a rain event in the proposed amendment is not consistent with the study of which it is founded upon. The February 2010 SDRWQCB response to this issue (Pg V-3) was incorrect and inadequate.**

The Leo Carrillo Beach reference study, used as the basis of calculating the TMDL exceedance frequency, uses "rainfall events of 0.1" or greater and the following 72 hours" as the rain event definition. The proposed TMDL *incorrectly* uses "rainfall events of 0.2 inches or greater and the following 72 hours" as the definition.

By *incorrectly* using 0.2", instead of the correct value of 0.1", the scientific basis related to incorporating the Leo Carrillo reference system exceedance frequencies is flawed. This concern was raised in SDRWQCB Response to Comments Part III in February 2010 by the County of San Diego on Page V-100.

[http://www.waterboards.ca.gov/sandiego/water\\_issues/programs/tmdls/docs/bacteria/updates\\_022410/2010-0210\\_Final\\_TechRpt\\_AppendixV.pdf](http://www.waterboards.ca.gov/sandiego/water_issues/programs/tmdls/docs/bacteria/updates_022410/2010-0210_Final_TechRpt_AppendixV.pdf)

The SDRWQCB staff response, located on page V-3 states "*there were no comments submitted at the time (2007) that opposed this definition of a wet weather day, thus no change in the definition was made.*"

Essentially, the SDRWQCB response is asserting that since nobody caught the error in 2007, it cannot be corrected. Not only is this statement in itself a major concern, the 2007 work was part of a *previous* basin plan amendment, which was withdrawn, and which did not even include a reference system approach. A new amendment and new approach was formulated, yet there is no chance to correct errors which were hatched from previous work, which used a completely different approach?

We recommend remedying the issue by altering the project documents to reflect the Leo Carrillo Beach reference study rain event definition of "rainfall events of 0.1" or greater and the following 72 hours".

Sincerely,

Joe Kuhn  
Storm Water Program Manager  
City of La Mesa