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THE CITY OF SAN DIEGO

February 18, 2004

VIA Facsimile: (916) 341-5550

Craig J. Wilson
TMDL Listing Unit, Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812

Dear Mr. Wilson:

Subject: 303(d) Listing –Delisting Policy Comments

The City of San Diego is pleased to provide the following comments regarding the 303(d) Listing – Delisting Policy. We would like to take this time to commend the State Water Resources Control Board staff on their efforts on consolidating Total Maximum Daily Load (TMDL) program across California.

The City of San Diego has concerns regarding the procedures outlined for listing bacterial impaired water body segments. The proposed threshold frequency is a 4% exceedance rate for beaches sampled during the AB411 season. This exceedance threshold is based upon the Bight 98 special study that was performed at one location for a limited duration of five weeks. Since only one location was sampled for a very short duration, the City recommends that the 4% criteria not be used due to possible unrepresentative conditions. In the absence of background data, the EPA currently recommends that locations should not have greater than a 10% exceedance rate of the total number of samples in a calendar year. The City supports using the 10% frequency for the number of bacterial water quality objective exceedances, which is consistent with the frequency exceedance rate for pollutants listed in this policy that have been statistically validated.

If you have any questions regarding this matter, please contact Ruth Kolb, Storm Water Specialist, at (619) 525-8636 or at rkolb@sandiego.gov.

Sincerely,


Karen Henry
Deputy Director

File: File



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