

Amy,

Thank you for allowing additional comments beyond the April 14 date (I was gone on vacation and missed it). I made a number of comments in my February letter, some of which have been incorporated. I have also had a chance to look at the County of Orange's current letter (April 16). My followup comments are as follows, but none of them are really substantive, so they could be handled as errata changes:

1. I agree with the County's comment #1, it would be nice if Section 2 would include a brief discussion of fecal indicator bacteria as surrogates for pathogens. A sentence or two at the end of the second paragraph would suffice, for example: "Indicator bacteria are used as surrogates to express potential human health risk from pathogens associated primarily with fecal material. However, the indicator bacteria species used for the REC-1 and REC-2 water quality objectives may also come from sources that are non-anthropogenic or not linked to pathogens."
2. With respect to County's comment #4,5 and 6, clarifying 5.1.4, 5.2.2, or 5.2.3 may not be critical, since how the exceedance days, exceedance probability or frequency are calculated would all be among the "other options and steps" allowed to be put forward in alternative ways under the provisions of the Section 5 introductory paragraph. However, I do agree with the County's comment #5 (suggested deletion of sentence on using critical wet year for determining critical dry days).
3. Also, under 5.2.3, it seems to me that the wording should be "discrete OR running geomean" to clarify that there are options/flexibility in how to think about and model this question (not previously addressed in any RB9 Bact TMDLs).
4. A little point of spelling: "discreet" is a personal quality of discretion or tactfulness; "discrete" means mathematically separate individual entities and is the word you want in 5.2.3 and 5.2.4. :-)

Thank you and good luck!

Nancy Palmer  
City of Laguna Niguel  
949-362-4384

-----Original Message-----

From: Amy Mecklenborg [<mailto:amecklenborg@waterboards.ca.gov>]

Sent: Friday, April 18, 2008 5:22 PM

To: Elaine Lukey; Nancy Palmer; [mlahsaie@ci.oceanside.ca.us](mailto:mlahsaie@ci.oceanside.ca.us); Jason Uhley; Cindy Lin; Mikhail Ogawa; [kholman@portofsandiego.org](mailto:kholman@portofsandiego.org); Amanda Carr; Ruth Kolb; Gabriel Solmer; [joann.weber@sdcounty.ca.gov](mailto:joann.weber@sdcounty.ca.gov); Eric Larson; Larissa Aumand

Cc: Ed Kimura; Christopher Hanger; Deborah Jayne

Subject: Any other Natural Source Exclusion comments?

Hello,

I would just like to invite you to let me know if there are any other issues/comments concerning the Natural Source Exclusion/ Reference System Antidegradation Approach Basin Plan Amendment. I know the April 14 comment date has passed but I have only received comments from Orange County. If you have any comments please email me and we can also set up a meeting time.

Thank you,

Amy Mecklenborg, MAS  
Environmental Scientist  
San Diego Regional  
Water Quality Control Board  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123-4340  
P 858.467.2952 F 858.571.6972  
Direct P 858.637.7139  
[AMEcklenborg@waterboards.ca.gov](mailto:AMEcklenborg@waterboards.ca.gov)