



THE CITY OF SAN DIEGO

July 29, 2016

VIA EMAIL

San Diego Water Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

RE: Comment – Tentative General Orders Nos. R9-2016-0004/R9-2016-0005

To Whom It May Concern:

The City of San Diego (City) appreciates the opportunity to comment on the adoption of the General Waste Discharge Requirements for Commercial Agriculture Operations (WDR). We understand that the San Diego Regional Water Quality Control Board (San Diego Water Board) is proposing Waste Discharge Requirements to provide additional clarification and control of discharges from agricultural operations to protect water quality in the San Diego region.

The City is pleased with the inclusion of the Total Maximum Daily Loads for Indicator Bacteria, Project I – Twenty Beaches and Creeks in the San Diego Region (Bacteria TMDL) in the WDR and wants to ensure the monitoring and implementation of the requirements are effective. We have detailed our comments to strengthen the TMDL requirements in the attached comment table.

Thank you for your time and consideration of these comments. If you have questions, please contact Ruth Kolb at (858) 541-4328 or rkolb@sandiego.gov.

Sincerely,

Drew Kleis
Deputy Director

DK\rk

Enclosure: 1. Comment Table Regarding Tentative Order R9-2016-0004 General WDR for Commercial Agricultural Operations

Transportation & Storm Water Department

9370 Chesapeake Drive, Suite 100, MS 1900 • San Diego, CA 92123
Hotline (619) 235-1000 Fax (858) 541-4350



Page 2
San Diego Water Board
July 29, 2016

cc: Mike Hansen, Deputy Chief of Staff/Chief of Policy
Alejandra Gavaldon, Director of Federal Government Affairs & Water Policy
Paz Gomez, Deputy Chief Operating Officer, Infrastructure/Public Works
Kris McFadden, Director, Transportation & Storm Water Department
Halla Raza, Director, Public Utilities Department
Ben Carrier, Deputy City Attorney, City Attorney's Office
Ruth Kolb, Program Manager, Transportation & Storm Water Department

City of San Diego Comment Table Regarding Tentative Order R9-2016-0004 General WDR for Commercial Agricultural Operations for Dischargers that are members of a Third-Party Group in the San Diego Region

July 29, 2016

November 9, 2016
 Item No. 9
 Supporting Document No. 9

Permit Section	Permit Page (Original)	Section Title	Reason for Proposed Changes/Comments	Proposed Changes
II.H	A-4	General Monitoring and Reporting Requirements	To provide documentation to support a statement that no discharge occurred during the monitoring period.	For any monitoring period in which no discharge occurred, the monitoring report shall include a statement certifying that no discharge occurred during the monitoring period and provide documentation <u>showing lack of runoff as required in Permit Sections III.B.2.c and IV.B.2.d.</u>
III. B.2.b	A-5	Core Monitoring Requirements	To clarify the frequency of sampling. This language is consistent with other WDRs.	<u>A sample should be collected and analyzed at each site during one qualifying storm event.</u> If there is no runoff at the monitoring site, then the observation shall be documented with photos showing the occurrence of irrigation and the lack of runoff at the monitoring site.
III. B.2.c	A-5	Core Monitoring Requirements	To clarify the frequency of sampling. This language is consistent with other WDRs.	Dry season samples shall be collected <u>once</u> after the site has applied pesticides or fertilizers and during an irrigation event. If there is no runoff at the monitoring site, then the observation shall be documented with photos showing the occurrence of irrigation and the lack of runoff at the monitoring site. <u>A site shall be monitored on a regular basis in the dry season (at a minimum monthly) to determine if discharge is occurring.</u>
Attachment E	E-8	Impaired Waterbodies and Applicable TMDLs, Implementation Plan	To require agricultural operators to reduce their bacteria loads according to the Load Allocations (LA) on page E-7.	Revise the language on page E-7 and E-8 to be consistent with the Bacteria TMDL Basin Plan Amendment (page A46), which states that, if individual or general WDRs are developed and issued to controllable nonpoint sources, the WDRs should incorporate “Effluent limitations that are consistent with the requirements and assumptions of the nonpoint source LAs. Effluent limitations should be expressed as numeric effluent limitations, if feasible and/or as a BMP program.” Monitoring alone is insufficient to ensure that agricultural sources will reduce their bacteria loads: These sources should be subject to effluent limitations in the WDRs.