



# REC-1 Triennial Review Report

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# Jul-Aug 2018 beach warnings City of SD



- La Jolla Cove, La Jolla
- Ski Beach & Vacation Isle, Mission Bay
- Visitor's Center Shoreline, Mission Bay
- Stub Jetty, Ocean Beach
- South Casa Beach, La Jolla
- Belmont Park, Mission Beach
- De Anza Cove, Mission Bay
- Dog Beach, Ocean Beach (*two separate advisories issued in July*)
- Shelter Island, San Diego Bay
- Comfort Station at Leisure Lagoon, Mission Bay
- Border Field State Park



# Support Staff Recommendations

- MS4: audit IDDE programs for human fecal sources
- Sanitary Sewer WDRs:
  - Conditions/risk assessments
  - Receiving water monitoring with triggers for further investigation
  - Fate and transport assessments
  - GIS mapping of system, materials
- Sanitary Sewer State General WDRs:
  - Address exfiltration, infiltration/inflow, prioritize replacement/upgrades based on beneficial use impacts



# Further Considerations

## Permittee Requests & TMDL Amendments

- Human sources (prioritization and compliance)
- Alternative compliance points (freshwater vs salt)
- Surfer Health Study and SSOs
- Compliance deadlines



# TMDL Amendments

- Do not support: amendments to bacteria TMDL sought by permittees
- Support: Staff recommendations for alternative/existing mechanisms to address bacteria impairments and discharges
- If TMDL reopened:
  - Support incorporation of wastewater agencies into TMDL
  - Support abbreviated compliance deadlines

# Human vs Non-Human Sources

- Support: Prioritization of human or (human-related) source identification and strategies
- Do not support: Human bacteria and sole indicator
  - “EPA has conducted analyses to characterize the potential differences in magnitude of illness arising from different fecal sources. In some cases these risks can be similar to exposure to human fecal contamination.”
  - “Both human and animal feces in recreational waters continue to pose threats to human health.”



# Alternative Compliance Points

- Do not support: moving compliance points solely to salt water recreational locations
  - Runs counter to law:
    - “Each NPDES permit shall include conditions meeting the following...monitoring requirements...to assure compliance with permit limitations.” 33 USC 1342; 40 CFR 122.44((i)(1). *LA County II* case.
  - Continuing degradation of impaired freshwater bodies



# Site Specific Objectives

- Do not support SHS serving as the basis for SSOs
  - Study enrolled only adult surfers vs previous studies included children/families
  - Surfers spend time offshore (farther from pollutant sources) vs swimmers/waders near-shore (closest to pollutant sources)
  - “We recommend caution in the direct comparison of risk estimates from this study with USEPA guidelines.”





# Compliance Deadlines

- Do not support: extended dry weather or wet weather compliance deadlines
- Support: abbreviating compliance deadlines
  - 10 years (BLRP) vs 20 years (CLRP)
  - “focus of WQIPs needs to shift...towards honing in on human sources..., which will require modification of compliance strategies.”



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