

Item Number 6c  
Supporting Document 8  
Response to Comments  
March 5, 2020

California Regional Water Quality Control Board  
San Diego Region

# Response to Comments

Tentative Resolution No. R9-2020-0036

Non-Regulatory Updates to the Water Quality Control Plan for the San  
Diego Basin

March 5, 2020



## Introduction

This report contains San Diego Water Board responses to written comments received regarding Tentative Resolution No. R9-2020-0036, *Non-Regulatory Updates to the Water Quality Control Plan for the San Diego Basin*. The proposed updates to Chapters 2, 3, and 4 of the Basin Plan and Staff Report were made available to the public for review on December 5, 2019. Interested persons had an opportunity to submit written comments during a 47-day comment period which extended from December 5, 2019 through January 21, 2020. One comment letter, from the County of San Diego, was received during the comment period.

## Comments and Responses

### 1. County of San Diego

- a. **Comment:** Proposed text preceding bacteria water quality objectives introduces ambiguity regarding the coliform indicators and their associated beneficial uses. **Recommendation:** Modify the final sentence of the proposed text preceding bacteria objectives, as found on page 3-12 of Chapter 3, as follows: *"The Basin Plan retains the use of fecal coliform and ~~total coliform~~ as an indicator for the protection of the non-contact recreation beneficial use and total coliform as an indicator for the protection of the shellfish harvesting beneficial uses."*

**Response:** Request is reasonable. The proposed language will be modified as suggested.

- b. **Comment:** Typographical Error in Footnote of Water Quality Objectives Tables 3-8 and 3-9.

**Recommendation:** Correct the acronym for "Hydrologic Sub-Area" from "HAS" to "HSA" in the footnote of Tables 3-8 and 3-9.

**Response:** The acronym was inadvertently changed during the previous Basin Plan update. The proposed language will be modified as suggested.

- c. **Comment:** Update Basin Plan Chapter 7 to Remove the County of San Diego as a Responsible Party for all Total Maximum Daily Loads (TMDLs) in the Chollas Creek Watershed.

**Response:**

This request falls outside of the scope of the current non-regulatory Basin Plan amendment. The County of San Diego (County) is currently named as a responsible party in two TMDLs within the Chollas Creek Watershed: TMDL for Diazinon and TMDL for Copper, Lead, and Zinc (Metals TMDL). The San Diego Water Board understands the County no longer has jurisdiction over lands within the Chollas Creek Watershed and therefore it is reasonable to remove the County as a responsible party; however, the process to remove the County as a

responsible party cannot appropriately be accomplished in this non-regulatory amendment and would need to occur under a separate regulatory action. For the Metals TMDL, it appears appropriate to remove the County from implementation requirements through the Municipal Separate Storm Sewer System (MS4) NPDES permit. The San Diego Water Board is able to simplify this process for the Metals TMDL because the County is not specifically named as a responsible party in the adopting Resolution (R9-2007-0043). With regards to the TMDL for Diazinon, the San Diego Water Board would need to amend the TMDL (itself) to remove the County as a responsible party. Modifications to Chapter 7 of the Basin Plan are currently not being considered however, this request will be considered for inclusion in the next triennial Basin Plan review workplan.