

## Schwall, Kristin@Waterboards

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**From:** Alano, Michele <MAlano@sandiego.gov>  
**Sent:** Monday, March 11, 2013 11:48 AM  
**To:** Schwall, Kristin@Waterboards  
**Cc:** McFadden, Kris; Jones, Allen; Sturdevan, Kip; Stroud, Heather; Kolb, Ruth  
**Subject:** Comment-Tentative Order No. R9-2013-0026, Place Id: 785854; Tentative Boatyard NPDES Permit  
**Attachments:** San Diego Water Board TO R9-2013-0026.pdf

Ms. Schwall:

Please find the enclosed response from the City of San Diego for the Tentative Order No. R9-2013-2026, Place ID: 785854; Tentative Boatyard NPDES Permit. Please contact Ruth Kolb at (858) 541-4328 if you have additional questions.

Thank you

Michele Alano  
Transportation & Storm Water Department



March 11, 2013

THE CITY OF SAN DIEGO

VIA EMAIL TO: [kschwall@waterboards.ca.gov](mailto:kschwall@waterboards.ca.gov)

Ms. Kristin Schwall,  
San Diego Water Board  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123

Subject: Comment – Tentative Order No. R9-2013-0026, Place ID: 785854; Tentative Boatyard NPDES Permit

Dear Ms. Schwall:

Thank you for the opportunity to comment on the San Diego Regional Water Quality Control Board's Tentative Order No. R9-2013-002 (General Waste Discharge Requirements for Discharges from Boatyards and Boat Maintenance and Repair Facilities Adjacent to Surface Waters within the San Diego Region). The City of San Diego, Transportation & Storm Water Department (City) is committed to protecting and improving water quality in our region. The City believes that implementing chronic toxicity testing on samples collected prior to the point of discharge during qualifying storm events as described in Attachment E Section IV.A.1 is not representative of the impact of storm water runoff on marine species. Freshwater discharges to marine environments will create conditions in the immediate zone of influence that cannot be tolerated by marine species, regardless of storm water cleanliness. A receiving water dilution zone should be considered for compliance purposes in marine receiving water environments influenced by freshwater runoff, as done in the California Ocean Plan Appendix I Definition of Terms. The City recommends that the sample location be moved into the receiving water mixing zone where marine species can tolerate the receiving water salinity.

If you have additional questions, please contact Ruth Kolb at (858) 541-4328 or at [rkolb@sandiego.gov](mailto:rkolb@sandiego.gov).

Sincerely,

Kris McFadden  
Deputy Director

KM/rk

cc: Allen Jones, Deputy Chief of Staff, Office of the Mayor  
Garth K. Sturdevan, Director, Transportation & Storm Water Department  
Ruth Kolb, Program Manager, Transportation & Storm Water Department  
Heather Stroud, Deputy City Attorney, City Attorney's Office

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