



California Regional Water Quality Control Board

San Diego Region



Alan C. Lloyd, Ph.D.
Secretary for
Environmental
Protection

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February 7, 2005

Professor Kara Nelson
Department of Civil and Environmental Engineering
663 Davis Hall
University of California, Berkeley
Berkeley, CA 94720-1710

In Reply Refer to:
WQS: 79-0056.02:carias *ny*

Dear Professor Nelson:

SUBJECT: REQUEST FOR SCIENTIFIC PEER REVIEW OF THE TECHNICAL PORTION OF THE AMENDMENT INCORPORATING THE BACTERIA-IMPAIRED WATERS TOTAL MAXIMUM DAILY LOAD PROJECT I FOR BEACHES AND CREEKS IN THE SAN DIEGO REGION INTO THE WATER QUALITY CONTROL PLAN FOR THE SAN DIEGO BASIN

This letter is a request for scientific peer review of the technical portion of the amendment incorporating the *Bacteria-Impaired Waters Total Maximum Daily Load Project I for Beaches and Creeks in the San Diego Region* (Bacteria TMDL Project I) into the Water Quality Control Plan for the San Diego Basin (Basin Plan). We ask that your review be completed within 30 days from the receipt of this package.

In accordance with section 303(d) of the Clean Water Act (CWA), the State must identify waterbodies that are not able to meet water quality standards based on available pollution controls. The CWA further requires states to establish a priority ranking for waters on the List of Water Quality Limited Segments and establish Total Maximum Daily Loads (TMDLs) for such waters. A TMDL represents a strategy for meeting water quality objectives by allocating quantitative limits for point and non-point pollution sources.

The components of a technical analysis include identification of the water quality problem, establishment of numeric targets, an analysis of the pollutant sources, establishment of a link between the numeric targets and attainment of water quality standards, and development of individual load and wasteload allocations. A TMDL is defined as "the sum of the individual waste load allocations for point sources and load allocations for non-point sources and natural background" such that the capacity of the water body to assimilate pollutant loading is not exceeded. A TMDL is required to account for seasonal variations and includes a margin of safety to address uncertainty in the analysis.

This project addresses several waterbodies in the San Diego Region. Specifically, TMDLs were developed for 45 impaired beach segments and five creeks amounting to roughly 24 miles of coastal shoreline and creeks. These TMDLs, including implementation plans, will be

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incorporated into the Basin Plan by formal adoption of a Basin Plan amendment. Independent review of the TMDLs for scientific viability is required prior to the adoption process. Peer reviewers cannot have participated in the development of the scientific basis or scientific portion of the TMDLs developed in this project. Further, peer reviewers must not have any economic conflict of interest with regard to the outcome of their comments or recommendations on the proposed Board action.

In order to assist you with your review of the technical analysis, the following information is provided as enclosures to this letter:

1. A brief summary of the Bacteria TMDL Project I;
2. A brief review of the scientific issues that require peer review;
3. A list of individuals involved in the development of this project.
4. Amendment to the Water Quality Control Plan for the San Diego Region to Incorporate a Total Maximum Daily Load for Bacteria-Impaired Waters (Beaches and Creeks)
5. A copy of the draft Technical TMDL Report, dated February 7, 2005;
6. A copy of the following referenced reports:
 - LARWQCB, 2002
 - LARWQCB, 2003; and
7. A copy of Health and Safety Code section 57004 (Senate Bill 1320).

Please note that enclosures include TMDL reports adopted by the Los Angeles Regional Water Quality Control Board (LARWQCB). Some key parameters from these reports were referenced for TMDL calculations in this project.

In addition to focusing on issues of particular concern, as identified in Attachment 2, peer reviewers are not limited to addressing these issues, but may also consider whether the report as a whole supports its scientific conclusions and recommendations.

Please contact Ms. Christina Arias if you have any questions or need further information. You may reach her at (858) 627-3931 or by e-mail at CArias@waterboards.ca.gov

The heading portion of this letter includes a Regional Board code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence and reports to the Regional Board pertaining to this matter.

Thank you for your assistance with this matter.

Sincerely,



John H. Robertus
Executive Officer

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Enclosures

cc: John Richards, OCC, w/out attachments
Rik Rasmussen, DWQ w/out attachments
Greg Frantz, DWQ, w/out attachments
Gerald Bowes, DWQ, w/out attachments

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