

commentletters - Comment Letter - Soquel Lagoon Watershed - Fecal Coliform TMDLs

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Subject: Comment Letter - Soquel Lagoon Watershed - Fecal Coliform TMDLs

The Central Coast Regional Board did not adequately address our comment of March 15, 2009, regarding a zero allocation of loading from human fecal sources. We continue to believe that that a zero allocation is impractical and unnecessary. Water quality standards for fecal indicator bacteria are not set at zero. They were developed based on an assessment of waterways which were subject to treated wastewater discharges and thus subject to human fecal discharges. A zero allocation is unnecessary, given that implementation plan includes programs and permits to address human sources through the stormwater permit, sewage collection and disposal system permits, and the human waste discharge prohibition. In the absence of data to suggest a different number, we would recommend that the same wasteload allocation for fecal coliform of 200 mpn/100ml be applied to all sources of impairment. Furthermore, we would urge that the human waste discharge prohibition be applied to all watersheds in the region, not just the named watersheds.

Thank you for the opportunity to comment.

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