

July 23, 2015

Christina Arias
San Diego Regional Water Quality Control Board
2375 Northside Drive #100
San Diego, CA 92108

Via email: CArias@waterboards.ca.gov

Dear Ms. Arias:

SUBJECT: Comments on the WQIP for the San Diego River

San Diego Audubon Society is very interested in the wildlife and habitat value of the San Diego River. This value depends on the chemical, biological, and physical values of the River and its water. Unfortunately the WQIP, as it stands, will provide very modest benefits for the wildlife of the River, which really needs those values to be improved. Very little progress is planned for each of the five year permitting cycles for bacteria, and there is no accounting for progress for the other very important conditions. We urge that the Regional Board require that the WQIPs provide substantially more benefits, with more accountability, and much sooner. The undersigned participated in the Consultation Panel for the San Diego River WQIP and advocated for these issues at each level of the process.

PRIORITY WATER QUALITY CONDITIONS

The WQIP has assessed only bacteria as a High Priority Water Quality Condition, HPWQC, for both dry and wet weather. It also identifies nitrates and phosphates, total dissolved solids, eutrophic conditions, and index of biological integrity in dry weather only as Priority Water Quality Conditions, PWQCs. The plan intends to implement multi-benefit measures that will improve bacteria and the other conditions. That sounds fine. But the plan will only test for and have specific goals for improvements in bacteria. It mentions adaptive management to meet its goals. So the water quality infrastructure and practices will be optimized for reducing bacteria but not for the other conditions. And there will be no measurements or targets to guide adaptive actions to optimize the reductions of the very important PWQCs. We strongly urge that the Regional Board require that the jurisdictions measure the levels of the PWQCs over time, establish target improvements for each of them, and require that adaptive management of the water quality infrastructure and practices also improve measureable and accountable improvements for each of the PWQCs.

TRASH AND LITTER

We are very disappointed that litter, especially plastic litter, was not selected as a Priority Water Quality Condition. We know that litter has significant impacts on the wildlife that use our waterways, receiving waters, and the Pacific Ocean. The impacts include trapping and snagging wildlife, being ingested whole by larger animals, being ingested (after it breaks down to small particles) by animals close to the bottom of the food chain, and (for bags and sheet materials) covering parts of the bottoms of our shoreline, wetlands, and waterways and thereby preventing normal movement of oxygen, nutrients, benthic animals, and seeds of plants between the water and the sediment, thereby degrading habitat value.

Litter is a very big problem in the SD River. Much of it comes from campers in the River. But also much of it flows in from the stormwater system or is blown in from uncovered vehicles and human activities along the River. Much of the litter in the SD River will end up in the mid Pacific Ocean. No practical way has been found to recapture that litter once it is in the ocean. There are practical ways to prevent litter and to trap what is left before it gets to the River and the Ocean. Many devices are designed to be readily retrofitted into an existing stormwater system with little or no modifications. Other regions take litter seriously and require that it be reduced. We urge the Regional Board to require that litter be included at least in the list of PWQCs and that measures and performance thresholds for the discharge of litter into the San Diego River be required.

Litter is also a branding problem for the San Diego River. When people see the River, they often see litter. This makes it difficult for them to think of it as the environmental, cultural, and historic treasure that it should be. Reducing the amount of visible litter in the River could tend to make people take restoring its values more seriously.

QUICKER TO IMPLEMENT STRATEGIES

Many of the strategies will take until 2033 to be fully implemented so the jurisdictions can achieve the Final Goals because it will take time to plan, design, do environmental review, acquire funds, manage construction, etc. to construct the infrastructure needed to meet the goals. However, there are strategies to help meet many of the goals that do not depend on the construction of large amounts of infrastructure. We appreciate that the current version of the WQIP does address implementing non-structural measures to make significant progress sooner. When the infrastructure-intensive structural measures are complete, the jurisdictions and the Regional Board could assess whether the earlier non-structural measures need to be continued. Two potentially quicker to implement measures that could have significant benefits are periodic cleaning of stormwater catchment basins and pipes and modification of stormwater channel maintenance practices. We will discuss each in the next few paragraphs.

CLEARING STORMWATER PIPES

A large volume of sediments, litter, pollutants, nutrients, and some fecal material collect in stormwater catchment basins and pipes over the dry months. It is likely that most of these are good hosts for fecal bacteria. At the first big rain, water pipe break, or need to flush a potable water pipe, that mess is flushed down into a downstream water body. Wastewater departments have developed techniques for clearing material from wastewater pipes to avoid blockages. Similar techniques, apparatus, and discipline could be used for stormwater pipes. Cleaning out the stormwater catchment basins and pipes periodically during the year would significantly reduce all of the WQIP's issues of concern. It could be initiated very quickly.

STORMWATER CHANNEL MAINTENANCE

Currently stormwater channels are periodically cleared completely, removing all soil, vegetation, and the trapped litter. The objective of that cleaning is purely to avoid flooding. But, the cattails and bulrush that tend to grow in stormwater channels and the organisms that live in the soil around their roots are very good at consuming nutrients, bacteria, and hydrocarbons. They also tend to physically trap sediments and suspended solids. If the maintenance of the channel segments that are less prone to flooding were modified to enhance the ability of the soil and vegetation to help filter stormwater, it is very likely that each of the WQIP's issues of concerns would be improved. In the long run, many stormwater channels could be enlarged so a reasonable level of growth could be left permanently to improve water quality. Any new or

reconstructed channels should be designed so their capacity would allow reasonable levels of vegetation to facilitate both water quality and flood control.

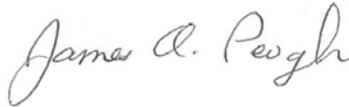
We urge that the regional board require that the jurisdictions implement quicker-to-implement non-structural strategies to reduce the pollutants of concern while they are developing long-term structural solutions. As the structural solutions come on-line and if they are shown to be effective the interim non-structural alternatives could then be reconsidered.

CONCLUSIONS

The purpose of the WQIP approach was to allow jurisdictions flexibility so that they can implement plans that are uniquely appropriate for the needs, problems, and characters of their regions. It appears that this flexibility is being misused to allow very modest water quality improvements at a very slow pace. We urge that the Regional Board substantially redirect this effort to better support the water quality needs of the humans, wildlife, and other beneficial uses of the San Diego River and to do it at a much faster pace.

Please notify us of any future milestones, hearings, decisions, or documents related to this process. For questions or follow-up I can be reached at peugh@cox.net or 619-224-4591.

Sincerely,

A handwritten signature in cursive script that reads "James A. Peugh".

James A. Peugh
San Diego Audubon Society