

**From:** "JohnStump" <jwstump@cox.net>  
**To:** <btobler@waterboards.ca.gov>  
**Date:** 10/12/2006 3:37:36 PM  
**Subject:** Fw: Chollas Creek Storm Water Order Metals & Storm Permit

Dear Mr. Tobler

Enclosed are comments on your CEQA Document concerning Toxic Metal Levels in Chollas Creek in the City of San Diego and County of San Diego. and Renewal of the City Storm Water Permit. I represent an association of Chollas Creek Restoration, Enhancement, and Conservancy. Please notice me at 4133 Poplar Street , City Heights, Ca 92105. I request written responses to my comments.

The Chollas Creek Restoration, Enhancement, and Conservancy is a new organization with different orientation single focused purpose - Chollas Creek Community Watershed. Our area of interest is the Chollas Creek watershed , its first mesa from approximately the inwards from the bay inlet and differing zones to water sources in the mountains above. We are a community based and watershed lead organization.

I was disturbed by suggestions by the City of San Diego staff that their obligations to comply could be lessen by demonstrating that Chollas recreation and shellfish fishing and recreation was of no historic value and if it could be eliminated they could be held to a lesser standard. Did I get this right??

Secondly, City Staff seemed to suggest that it was uniquely the Regional Board's responsibility to come up with a plan and a way to Clean up Chollas Creek and to pay for it. It was some how your problem and if you would only tell the City and County what you wanted and what your standards were they would do it. Did I get that right.?

We got the impression that there has not been a wide enough participatory process on this order. Please include us please send me a copy of your past distribution list. You may have included the agencies that I have suggested in my list to Councilwoman Frye; but please make sure the appropriate policy person is receiving notice of the level of takings that are being proposed by the this compliance order

The body of my remaining comments and questions are contained in the forwarded e-mail to Councilwoman Donna Frye of the City of San Diego..

Please Apply these Comments to both the pending toxic Metal Chollas Creek CEQA Document and Renewal of the City Storm Water Permit.

All the best  
Chollas Creek Restoration, Enhancement, and Conservancy.  
4133 Poplar  
City Heights, CA 92105

----- Original Message -----

From: JohnStump  
To: donnafrye@sandiego.gov ; toniatkins@sandiego.gov  
Cc: Stephen Hill ; Maryann at fry ; quiroz ; Eric Bowlby ; Ms. Carrol Vaughn ; Jimmy Vee ; Richard Lawrence ; Gabriel Solmer  
Sent: Thursday, October 12, 2006 9:43 AM  
Subject: Chollas Creek Storm Water Order Hearing

Dear Councilwoman Frye

Thank You for beginning the process at the Legislative Branch yesterday. Your insight and Leadership was helpful. Mrs. Stump send her regards.

As you schedule future hearings and notice future partners to come to the table several issues came to mind. I want to briefly identify these issues out below:

Missing Partners:

#### CALTRANS:

In the Chollas Watershed we have many freeways that cross it. The Martin Luther King, I-5, I-15, and I-805 freeways dump road wash directly into Chollas creek. My favorite is the drain spout on the I-805 underpass for Home Avenue. CALTRANS's must be part of the clean up.

#### COUNTY of SAN DIEGO

Most City of San Diego residents forget that there is an incorporated portion of the County in the middle of the City next to Mt. Hope Cemetery and in the Chollas water shed. There is a doughnut hole in watershed. The County controls the Air Pollution Board and Environmental Services and these agencies need to sit with us on this clean up. One of these agencies is located in the watershed. The County should be helping with our clean up efforts.

#### POLICE, FIRE, PARKS and REC.

These three (3) Departments must review their procedures in the water shed that may be contributing to storm water pollution. Vehicle parking, equipment draining and washing, and animal exercise and relief. Pool maintenance and draining is a concern as are practices concerning fertilizers and grounds maintenance.

#### MOUNT HOPE, CHOLLAS LAKE, CHOLLAS LAND FILL and OTHER SITES

During yesterday's staff presentation infiltration was dismissed because of soil conditions of vernal pools. What needs further consideration is use of City sites like Mount Hope, storage at Chollas Lake, use at Chollas Land Fill, Colina del Sol golf course, and other City sites. I was intrigued when faced with a Billion dollar price tag; by the San Pasqual brackish water project. We could explore a demonstration project of infiltration of brackish water as has been done in LA for downtown to begin to recover that aquifer.

#### REDEVELOPMENT AGENCIES & HOUSING & WORKFORCE PARTNERSHIP

At least four redevelopment areas are involved in the Chollas water shed - City Heights, SEDC, Crossroads, and Barrio Logan. CCDC sends low income housing funds to these areas and is supported by its workers and infrastructure. The Housing Commission has more than 30% of its housing in the Chollas watershed. How much of the Housing Commission's Housing stock is threatened by the Western study is unknown. These six (3) agencies could contribute to the planning process to a better solution to the water shed. They should also be asked to review their BMP's.

#### SDG&E , COX CABLE, SBC COMMUNICATIONS

The Chollas watershed has for the most part above ground copper wire utilities on creosol wood poles. The impact of accelerating the schedule of undergrounding these utilities on storm water should be considered. Advancing the schedule for the Chollas community undergrounding would remove thousands of tons of copper and chemicals from Chollas water shed now.

San Diego City Schools, Community Colleges, Private Schools, Churches and Related.  
Absent from the staff report was the involvement of the San Diego City School representatives. San Diego City Schools may have more facilities and acres Chollas than the City. They and the others listed above should be at the table

#### SAN DIEGO MILITARY COMMUNITY

Absent from the staff report was the Military community. Most people are unaware the US military have extensive housing projects in the Mid City and City Heights. One project is over Auburn Creek and several are directly adjacent to the Chollas Creek. The Military needs to be at the table in several roles.

#### REGIONAL AIRPORT AUTHORITY

Any resident of the Chollas Watershed knows they live under the approach to Lindbergh Field and that it is noisy and jet fuel dirty. Some of that Jet fuel must get into the water. The Airport need to be at the table.

**PORT of SAN DIEGO**

I was very distressed that the Departments staff was working so hard to get rid of traditional use of Chollas Creek Shell fishing by commercial, recreational and Native American people. We often think of the Port of San Diego as just the Convention Center or Harbor Drive Hotels ; but this is the Port too and they need to get involved and help out. I think that the Port of San Diego should be ask to start funding a demonstration project restore and repair these habitat's now.

I hope that his provides a starting for some additional ideas for your future hearing on Chollas Creek Storm Water Permit and Toxic Metals. Thank you for your commitment to us to bring the community to the table.

All the best  
John W. Stump  
4133 Poplar  
City Heights, Ca 92105

**CC:** <donnafrye@sandiego.gov>, <toniatkins@sandiego.gov>, "Maryann at fry" <mkempczenski@sandiego.gov>, "quiroz" <quiroz@cox.net>, "Eric Bowlby" <savewetlands@COX.NET>, "Ms. Carrol Vaughn" <carrolv@sdhc.org>, "Gabriel Solmer" <gabe@sdcoastkeeper.org>, "Malinda Dickenson" <MDickenson@sandiego.gov>, "Cory Briggs" <cory@briggslawcorp.com>, "Stephen Hill" <SHill@sandiego.gov>, "Jimmy Vee" <city\_heights\_92105@yahoo.com>, "Richard Lawrence" <ahcsd@hotmail.com>