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July 31, 2015

Submitted Electronically
SanDiego@waterboards.ca.gov
Attention: Christina Arias

Ms. Christina Arias, P.E.
California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Dear Ms. Arias:

The San Dieguito River Valley Conservancy (Conservancy) thanks you for the opportunity to comment on the City of San Diego's San Dieguito Water Quality Improvement Plan (WQIP) dated April 2014. As the Conservancy Executive Director, I was appointed to the WQIP Consultation Committee by the City of San Diego (City) to represent the Environmental Community. We previously provided comments on the draft WQIP to the City on November 21, 2013, June 12, 2014 and to the Regional Board in January of 2015. We do not believe the City considered revisions to the priority water quality conditions based on recommendations from the WQIP Consultation Committee which overwhelmingly supported nutrients be added as a priority water quality condition.

We reiterate our previous comment that overall, the WQIP process seems very rushed and the timeline to provide thoughtful comments on the WQIP is not adequate. It would be beneficial for all stakeholders, including the Consultation Committee, to have the opportunity and more time to review and comment on these important documents.

Based on the continued assertion that bacteria is the highest priority condition in the San Dieguito watershed, we are not convinced that the City Stormwater, Public Utilities and Multiple Species Conservation Program (MSCP) are sharing water quality and species data obtained through City water quality and MSCP projects being implemented within the watershed.



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Highest Priority Water Quality Condition

The WQIP should add Lake Hodges as a Focused Priority to prevent the water quality of the land and river to deteriorate further from additional development in the watershed. Lake Hodges suffers from nutrient related contamination. The nutrient issue will not be adequately addressed by strategies devoted to reduce bacteria.

Many issues were brought up by Consultation Committee members at every WQIP meeting relating to the data/information/formula utilized to support the City's determination that BACTERIA is the ONLY highest priority water quality condition in the watershed.

There are four water storage reservoirs in the San Dieguito River watershed including Sutherland Reservoir, Lake Ramona, Lake Poway and Hodges Reservoir, that serve not only the residents within the watershed, but citizens throughout the county. San Diego's Public Utilities Department operates and maintains Sutherland and Hodges Reservoirs. Hodges currently serves the San Dieguito Water District and Santa Fe Irrigation District, as well as the City. The Ramona Municipal Water District owns and manages Lake Ramona. Water from Lake Ramona is used exclusively in the untreated system serving the Highland Valley area of Ramona and for emergency storage purposes. Two additional reservoirs – Olivenhain and San Dieguito – are located in the Carlsbad watershed but routinely receive water transferred from Hodges Reservoir. Olivenhain Reservoir is managed by the San Diego County Water Authority. The San Dieguito Water District, a subsidiary of the City of Encinitas, provides drinking and recycled water to over 38,000 citizens in the communities of Leucadia, Old Encinitas, Cardiff and portions of New Encinitas. The remainder of the City is served by the Olivenhain Municipal Water District. The City must obtain data from these other water providers for input into the WQIP.

Nutrient loading should be recognized as another highest priority water condition due to the impacts to the quality of the water that residents throughout the County drink and utilize in their homes and businesses (i.e., Lake Hodges as a receiving water), would be a PRIORITY BENEFICIAL USE and that **NUTRIENT** loading should be elevated to High PRIORITY WATER QUALITY CONDITION in the upper watershed east of the Hodges Reservoir and west of Sutherland Reservoir. We concur with the comment made by

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Coastkeeper in its June 12, 2014 letter that:

“ . . . [T]he San Dieguito watershed could be divided between regions upland of Lake Hodges and below Lake Hodges, allowing for an additional High Priority Water Quality Conditions (such as nutrients) where applicable. . . . Coastkeeper respectfully asks the Board to urge each watershed to strongly re-consider taking approaches by dividing between upper and lower watersheds, or between receiving water bodies upstream from the Pacific Ocean. . . . ”

Lack of Supporting Data for Bacteria

There is no mention of any projects funded by IRWM grants that address bacteria as the highest priority water condition. There is no data to support bacteria as the highest priority water condition.

The City has not provided a clear explanation of why the WQIP continues to use BACTERIA when the receiving water (Pacific Ocean) was delisted for bacteria in 2010. We need an explanation that definitively sets forth the reasoning and methods used by the City to assess priority conditions in the San Dieguito River watershed and need to know the baseline to determine how much effort a jurisdiction will be required to take to reach the goal for bacteria.

There must be data available to support the delisting of the receiving water for bacteria in 2010. It is imperative that this data be reviewed and analyzed to determine the baseline condition at the receiving water for bacteria. We have asked for this data to be provided and it has not been provided to us to date. We again request that this data be provided.

Data associated with several ongoing projects in the Lake Hodges has been provided to the City to support nutrient loading as a highest priority water condition. That data must be reviewed and analyzed by the City.

Ongoing Projects in Watershed Address Nutrient Loading

Since 2007, several projects recommended as part of the WMP were funded by millions of dollars of the State bond grants to assist the jurisdictions in meeting water quality and conservation goals associated with nutrient loading.

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The Conservancy is implementing Integrated Regional Water Management Project No. 50-17- 80017, known as the San Dieguito Watershed Management Plan Implementation Project – Lake Hodges Natural Treatment System (NTS) Conceptual Design, funded by Proposition 50. For purposes of this study, the project is referred to as the Hodges Reservoir Watershed Natural Treatment System project. As the name suggests, this planning effort focuses on evaluating methods to reduce nutrient loading through the development of an NTS within the watershed draining into Hodges Reservoir.

Pursuant to a Proposition 84 grant, the City of San Diego Public Utilities Department and the Water Authority are administering a contract to have a consultant team evaluate in-reservoir treatment and management options to improve water quality. The team specifically evaluated water quality trends, evaluated methods to improve water quality through a Dynamic Reservoir Simulation Model – Water Quality model, recommended a set of projects to reduce the level of pollutants that contribute to federal Clean Water Act Section 303(d) impairment listings for Hodges Reservoir, and evaluated how these water quality changes will impact Quagga mussels (*Dreissena rostriformis*). A Draft Conceptual Planning Report (Brown and Caldwell 2014) was reviewed in preparation of this document, as it is complementary with the watershed NTS project.

The Proposition 50 Conservancy and Proposition 84 City Public Utilities' projects are not mentioned in the WQIP. It is expected that these two efforts would function in a complementary fashion to achieve the overall goal of improved water quality, reduced treatment costs, improved water supply reliability, and opportunistic improvement to native habitat and species conservation.

Other projects undertaken since 2007 include:

- Hodges Reservoir Water Quality Improvements Implementation Projects (City of San Diego Public Utilities Department);
- Hodges Reservoir Water Quality Improvements Plan (City of San Diego Public Utilities Department);
- Groundwater and Salt Management Program (Santa Fe Irrigation District)
- North County Regional Water Supply, Flood Control, Water Quality, and Habitat Protection/Enhancement Project (Santa Fe Irrigation District)

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The WQIP should include any recommendations and findings from these projects into the management strategies.

Felicita Creek

We refer to Laura Hunter's letter of January 29, 2015 relating to the "myriad" of pollution problems at Felicita Creek. The City and the County need to correct the issues at Felicita Creek, which negatively impact Lake Hodges.

Habitat

The watershed has significant biological importance which is underscored by its inclusion in the County's award-winning Multiple Species Conservation Program (MSCP) Plan. This is important because MSCP lands are designated as valuable habitat required to be conserved and managed to support the viability of over 85 different plant and animal species. Non-structural BMP's, including invasive species removal and habitat restoration should be considered in these areas.

The WQIP includes the following definition of "Beneficial Uses": "The beneficial uses of a waterbody are designated in the San Diego Regional Basin Plan and defined as "the uses of a waterbody necessary for the survival or well-being of man, plants, and wildlife (SDRWQCB, 1994). However, The WQIP and the Potential Strategies do not include and thorough discussion or specific priority strategy that is related to habitat restoration or enhancement (removal of invasive plants and planting of native species) which will not only sustain habitat for wildlife, but also provide water quality benefits downstream of these activities. The WQIP only suggests that invasive plants should be 'avoided' in multi-use treatment areas. They should be prohibited everywhere. The reference documents should include any watershed specific MSCP species monitoring data that may indicate the presence of species or adaptive management actions that need to be taken to improve the viability of the preserve.

A diverse array of habitats exist from the eastern headwaters at Volcan Mountain to the outlet at the San Dieguito Lagoon and the Pacific Ocean. There are several important natural areas that sustain a number of sensitive, threatened and endangered plant and animal species within the River Park, San Dieguito Lagoon and several open space preserves. If invasive plants

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such as arundo or eucalyptus proliferate upstream, they will take over the native habitat, deteriorating the viability of the habitat to support aquatic and other species downstream, impacting the success of the MSCP.

Watershed Council

Water quality and watershed restoration and enhancement activities need to be well coordinated in an integrated and sustainable manner, key interest groups should be able to communicate, share their perspectives, and work together to create and implement coordinated solutions for watershed issues. Other activities related to the watershed and water quality, including issuance of waste discharge requirements for agriculture and integrated regional water management planning will also benefit from the active participation of the public.

In 2007, the San Dieguito Watershed Council (Council), co-chaired by the San Dieguito Conservancy and the River Park, was formed pursuant to a recommendation from the 2007 San Dieguito River Watershed Management Plan (WMP) to implement the WMP and take actions as necessary to reflect changing watershed conditions through a coalition of stakeholders. The jurisdictions built their capacity to work locally and think regionally through the Watershed Council, focusing their efforts on educating citizens about their responsibility to conserve water and improve water quality. Unfortunately, ongoing funding for the Watershed Council was not identified and the Council has not met since 2010.

There is an immediate need to re-initiate the Watershed Council to coordinate the implementation of the WMP and development of the WQIP. It is imperative that the WQIP and the WMP recommendations and priorities are consistent to prevent duplication of efforts and higher costs related to water quality projects in order to obtain future grant funding for implementation projects. The re-initiation of the Watershed Council should be a priority strategy in the WQIP.

There are several optional strategies that should be pursued immediately and not until a later date. It is imperative that the co-permittees acquire open space land now as a priority strategy before it is developed to prevent further water quality impacts. It is imperative that the co-permittees reinstate the Watershed Council now to coordinate all of these ongoing watershed, water quality, proposition 50 and proposition 84 projects and provide a forum for

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public input. It is imperative that future projects, policies and regulations included in the WQIP build upon and/or complement what has been accomplished during the last five years.

The comprehensive planning and public outreach efforts of the WQIP, WMP and IRWM efforts must be incorporated into an overall water quality improvement strategy by the agencies and stakeholders. It is only through a collaborative approach that we will improve the water quality in our watersheds.

We appreciate your consideration of these comments. If you have any questions, please contact me at 858-755-6956 or trish@sdrvc.org.

Sincerely,

Patricia Boaz

Trish Boaz
Executive Director

cc: Peter Shapiro, President Conservancy
Kevin McKernan, Executive Director San Dieguito River Park
Shawna Anderson, Principal Planner, San Dieguito River Park
Karina Danek, City of San Diego
Cor Shaffer, Santa Fe Irrigation District
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