



Comments on Agua Hedionda Lagoon 303(d) Listing for Sediment Toxicity and Possible Future Segmentation of the Agua Hedionda Lagoon

Thank you for the opportunity to provide my comments to the California Water Quality Control Board Approval for the 303(d) listing process for 2014-2016. I also appreciate the assistance, extensive knowledge-base and professionalism of the scientists at the San Diego Regional Board and at Sacramento Water Quality Control Board.

My comments:

1. Not Enough Data to Support Segmentation, More Data Needed:

The basis for concluding that small samples of sediment taken at only 2 locations (one in the outer and one in the middle basin of the lagoon) are representative of, and fully describe the level of toxicity in the outer and middle sections of the lagoon, in light of the purported differences in drainage and tidal flushing etc., throughout the lagoon isn't clear. With such a paucity of samples, where does one draw an accurate line between the half with sediment toxicity and the half without? My understanding from Bight 2008 scientists from SCCWRP is that the intent of their sample population size is to survey the entirety of Southern California coastal waterbodies along the bight, not to measure the magnitude and extent of toxicity within a particular waterbody.

2. Agua Hedionda Lagoon Needs Listing for Category 4c: Impaired by Pollution, Habitat Alteration and Hydrologic Alteration:

About 1952-1954 the Agua Hedionda Lagoon's hydrology and ecology was significantly altered to provide Once-Through-Cooling for the Encinas Power Station. The outer basin of the lagoon is dredged about every 2-3 years because of extensive sandbar formation in the outer basin of the lagoon. The continuous build up of sediment in the outer basin can hamper adequate tidal flushing of the lagoon and eventually lead to adverse impacts to tidal prism habitat. (See attached recent photo of the large sandbar.)

3. No Routine Summer-Time Monitoring for Bacteria is Required to be Performed by San Diego County in the Middle Basin of the Lagoon, but Agency Routine Summer-Time Monitoring for Bacteria Should Be Done:

This is a location where children and families are permitted to swim and which is subject to both a municipal storm drain outfall and an industrial one. In 2009, testing indicated elevated levels of bacteria from the municipal storm drain outfall.

4. 2009 Documentation for Prior De-Listing of Agua Hedionda Lagoon for Sedimentation suggests monitoring of the sediment build-up in the outer, middle, and inner lagoon is supposed to be ongoing; needs clarification:

The lagoon receives sediment-laden run-off, with chemicals/ bacteria bound to the sediment, from a variety of sources including: municipal and industrial storm drains, inadequate tidal flushing and sandbar formation as explained above, and the Agua Hedionda Creek, which empties into the eastern basin of the lagoon, as well as from highways and the railroad which intersect the lagoon, and Carlsbad streets/ lands. In light of these impacts to beneficial uses, sedimentation is a potential pollutant of concern.

For a long time, until about 2010, the lagoon had been listed for sedimentation and bacteria. A document used to justify de-listing contained the following statement which seemed to help bolster the sedimentation de-listing decision: "The Encinas Power Station continues to monitor the sediment build up in the outer, middle, and inner lagoon." However, this monitoring has apparently never been done.

5. Potential Adverse Impacts of Low-Level Contaminants over Extended Time Periods Needs Additional Study:

The lagoon contains many contaminants such as polycyclic aromatic hydrocarbons, fuel oil components, pesticides and heavy metals etc., but apparently these are at safe levels. The adverse effect of low levels of these contaminants over extended periods of time to species / habitat as well as synergistic impacts are not fully understood and need to be studied.

6. Potential Contaminated Soil/ Groundwater Migration Impacts to Beneficial Uses; Lagoon Waters Need Protection:

The approximate 95-acre Encinas Power Station site is located on the southern rim of the middle and outer basins of the lagoon, west of the railroad tracks. It is considered a developable brownfield site and the soil and groundwater under the facility are known to have been contaminated with Petroleum Hydrocarbons and pesticides.

If lagoon segmentation is to be attempted, which would be the first time a lagoon would be segmented in Region 9, please consider a complete public hearing process.

Thank you for considering my comments.

With kind regards,
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