



CITY OF OCEANSIDE

WATER UTILITIES DEPARTMENT

October 23, 2009

Ms. Cynthia Gorham-Test
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Re: Comments on the 2008 Draft Clean Water Act Sections 305(b) and 303(d) Integrated Report for the San Diego Region

Dear Ms. Gorham-Test,

The City of Oceanside is submitting this letter in response to the request for comments on the 2008 Draft Clean Water Act Sections 305(b) and 303(d) Integrated Report for the San Diego Region. Thank you for the opportunity to comment and the extension of the comment period.

San Luis Rey HU

Overarching comments:

- Throughout the report and lists, there are several references to “Pacific Ocean Shoreline, San Luis Rey HU, Oceanside Pier at...” followed by different sampling locations within the City, only one of which is actually at the pier. This should be changed to “Pacific Ocean Shoreline, San Luis Rey HU, Oceanside at...” to reduce confusion.
- The Lines of Evidence (LOE) that use SWAMP data repeatedly lump the two SWAMP San Luis Rey monitoring stations (903SLSLR2 and 903SLSLR8) together, although they are over 30 miles apart. The assessment area for the listings include only the lower 19 miles, and so SLR2 is outside of this assessment area. More site/impairment details are included below.

Table 1 provides comments on the new draft listings for the lower 19 miles of the San Luis Rey River.

Loma Alta HA

Table 2 provides comments on the draft listings for Loma Alta Creek.

Table 1. San Luis Rey River Draft 303d Listing Comments.

Impairment	Decision ID	LOE ID	Comment
Enterococcus	17074	7494	The link is incorrect. It links to the Santa Margarita Watershed report.
Fecal Coliform	17075	7495	The link is incorrect. It links to the Santa Margarita Watershed report.
Phosphorous	17070	7348	The link is incorrect. It links to the Santa Margarita Watershed report.
		25793	<ul style="list-style-type: none"> • According to the SWAMP data, two of the four samples (IDs 5399642 and 5411682 from 3/1/05 and 4/20/05, respectively) were below the WQO of 0.1 mg/L. • These four samples were taken from SWAMP station SLR2 which is located over 30 miles inland, outside of the assessment area. <p>This line of evidence should be removed as it is not relevant to the assessment area.</p>
Selenium	17071	21182	<p>“Data Used to Assess WQ”: Says “Four of the samples showed excessive sulfate concentrations...”</p> <ul style="list-style-type: none"> • Sulfate should be changed to selenium • Four of the eight sites were from SLR2 which is outside of the assessed area for the listing (the lower 19 miles) and should be removed. • Of the remaining four samples from SLR8, one was marked with “Estimated; non-compliant with associated QAPP” and should be removed from the listing assessment. <p>In addition, more recent Copermittee storm water and ambient MLS and TWAS data does not show any exceedances of the selenium WQO from 2001 through 2008 (0 of 26 samples). The basis for this listing should be reviewed.</p>
Sulfates	17068	23500	<ul style="list-style-type: none"> • Four of the eight sites were from SLR2 which is outside of the assessed area for the listing (the lower 19 miles) and should be removed. • The Weight of Evidence section references section 3.2 of the Listing Policy which would indicate that sulfate is a conventional pollutant and therefore would require a minimum sample number of 5. <p>Since sulfates are considered a conventional pollutant, then the minimum number of samples would not be met and sulfates should not be listed on the 303d list for this segment.</p>
Total Nitrogen as N	17072	7355	The link is incorrect. It links to the Santa Margarita Watershed report.

Impairment	Decision ID	LOE ID	Comment
		7375	<ul style="list-style-type: none"> The SWAMP data indicates that only 5 samples were collected at SWAMP station 903SLSLR2 (as opposed to the 8 stated in the fact sheet). Of these five, two exceeded 1 mg/L. Of those two, the 5/19/2004 sample included a nitrate value that was estimated and not compliant with the QAPP. In addition, this LOE is for samples from SLR2, which is over 30 miles inland and should not be used in the evidence to list the lower 19 miles. <p>This line of evidence should be removed as it is not relevant to the assessment area.</p>
		23502	<ul style="list-style-type: none"> The SWAMP data indicates that only 3 samples were collected at SWAMP station 903SLSLR8 (as opposed to the 8 stated in the fact sheet), all of which exceeded the WQO. Of those three, the 5/18/2004 sample included a nitrate value that was estimated and not compliant with the QAPP, which is part of the Total Nitrogen calculation. Should this data point still be included?

Table 2. Loma Alta Creek Draft 303d Listing Comments.

Impairment	Decision ID	LOE ID	Comment
Selenium	16516	8875	<ul style="list-style-type: none"> One of the four samples has the comment, "Estimated; not compliant with QAPP" and should therefore be removed from the listing assessment. <p>More recent Copermittee stormwater and ambient TWAS data does not show any exceedances of the selenium WQO.</p>

Agua Hedionda HA

The City supports the recommendation to de-list Agua Hedionda Lagoon for indicator bacteria, as the water body meets the water quality standard established for this pollutant. Seven lines of evidence were considered in the assessment of this pollutant-water body combination and the data demonstrate that applicable water quality standards are being achieved. The City also supports the recommendation to de-list Agua Hedionda Lagoon for sedimentation/siltation based upon the weight of evidence presented in the fact sheet.

Thank you again for your consideration of these comments. If you have any questions, please contact Alison Witheridge at 760-435-5822.

Sincerely,

A handwritten signature in blue ink that reads "M. A. Lahsaie". The signature is written in a cursive style.

Mo Lahsaie, Ph.D., REHS
Clean Water Program Coordinator