

**WRITTEN COMMENTS RECEIVED BY FEBRUARY 28, 2017**

**for**

**Tentative Resolution No. R9-2017-0030**

<b><u>List of Commenters</u></b>	<b><u>page</u></b>
<b>1. Natalie Shapiro</b>	<b>2</b>
<b>2. Jan Bandich</b>	<b>3</b>
<b>3. Janell Cannon</b>	<b>5</b>
<b>4. Jodi Pendry Good</b>	<b>7</b>
<b>5. Robin Hansen</b>	<b>8</b>
<b>6. Sean Kirkwood, Addison Sheet Metal Inc.</b>	<b>9</b>
<b>7. Toby Roy (via Jessica Hahn), San Diego County Water Authority</b>	<b>10</b>
<b>8. Mary Anne Viney, Agua Hedionda Lagoon Stakeholder Group</b>	<b>13</b>
<b>9. Karen Holman, Unified Port of San Diego</b>	<b>17</b>

**From:** natalie shapiro [mailto:bloomingtrillium@yahoo.com]  
**Sent:** Monday, February 27, 2017 8:27 PM  
**To:** sandiego <sandiego@waterboards.ca.gov>  
**Subject:** Agenda Comment - Tentative Resolution No. R9 -2017- 0030

Thank you for the opportunity to comment on the Tentative Resolution No. R9-2017-0030. I applaud the SD Water Board striving to prioritize its limited resources on key beneficial uses and key areas for 303(d) listed water bodies.

I am requesting priority ranking for the Aqua Hedionda Lagoon, which has been designated by the Regional Board as a 303(d) listed impaired water body. The reasons are below:

1. It is a Key Area for fishing and shellfish harvesting. Aqua Hedionda Lagoon is used extensively for fishing and shellfish harvesting; many locals regularly fish there and consume the fish that they catch. In addition, Agua Hedionda Lagoon is the location of the only existing commercial shellfish growing operation in the San Diego Region.
2. It is a Key Area for the beneficial use of habitats and ecosystems in the San Diego Region: Aqua Hedionda Lagoon includes eelgrass beds in the lagoon; and includes the Agua Hedionda State Ecological Reserve.
3. It is a Key Area for recreation: There is a human health concern as the middle part of the lagoon contains the YMCA Aquatic Park activities, a children's summer camp where swimming and other aquatic activities are provided. Children are vulnerable to health hazards from exposure to contaminated sediments.

Thank you so much,

Natalie Shapiro

7831 Rush Rose Drive, Unit 309

Carlsbad, CA 92009

**From:** Jan Bandich [mailto:jbandich@att.net]  
**Sent:** Monday, February 27, 2017 9:03 PM  
**To:** sandiego <sandiego@waterboards.ca.gov>  
**Subject:** AGENDA Comment - Tentative Resolution No. R9-2017-0030

I am writing regarding mine and my neighbors' concerns for the Agua Hedionda Lagoon (Hydrologic Unit Basin Number 4.31), which is listed as a 303(d) body of water. We think it should receive a Priority Ranking due to its many Beneficial Uses, which are impacted by degraded water conditions. The Water Board's "Practical Vision" concept of focusing on Key Beneficial Uses and Key Areas is appropriate in studying the Agua Hedionda Lagoon. The Agua Hedionda Lagoon meets 13 of the 15 Beneficial Uses of Coastal Waters on the chart and also meets 3 of the 4 Key Areas of focus.

**KEY AREAS OF FOCUS** - "most critical to protecting human and environmental health."

**1. FISH AND SHELLFISH CONSUMPTION (COMM) (AQUA) (COLD):**

The Agua Hedionda Lagoon is the only existing commercial shellfish growing operation in the San Diego Region and clean water is essential.

The Agua Hedionda Lagoon jetties and the Agua Hedionda Lagoon shoreline areas and kayak fishing are of special importance because, though many enjoy the sport, other residents depend on their fishing as a source of food. Healthy fish require clean water.

**2. RECREATION: (REC 1) (REC 2):**

The Agua Hedionda Lagoon includes both a REC 1 and REC 2 Beneficial Use ranking. Hundreds of residents and visitors boat, water ski, wake board, stand-up paddle board, kayak, use water bikes and wave-runners year-round on the Lagoon. The YMCA runs a children's summer camp where swimming and other aquatic activities are provided. These are wonderful, IF the water is safe.

**3. HABITATS AND ECOSYSTEMS: (WILD) (SAL)( MAR) (BIOL):**

The Agua Hedionda Lagoon is a State Ecological Reserve and is supervised by the Department of Fish and Wildlife. The eelgrass beds (*Zostera marina* L. and *Z. pacifica*) in the Agua Hedionda Lagoon are considered to be a "foundation" or a habitat-forming species. Eelgrass contributes to ecosystem functions at multiple levels, as a primary and secondary producer, as a habitat structuring element, as a substrate for epiphytes and epifauna, and as sediment stabilizer and nutrient cycling facilitator. Eelgrass provides important foraging areas and shelter to young fish and invertebrates, food for migratory waterfowl and sea turtles, and spawning surfaces for invertebrates and fish.

([http://www.westcoast.fisheries.noaa.gov/publications/habitat/california\\_eelgrass\\_mitigation/Final%20CEMP%20October%202014/CEMP\\_oct\\_2014\\_final.pdf](http://www.westcoast.fisheries.noaa.gov/publications/habitat/california_eelgrass_mitigation/Final%20CEMP%20October%202014/CEMP_oct_2014_final.pdf)) Clean water is essential to the support of marine and terrestrial habitats, ecosystems, vegetation, and wildlife

For these reasons, we believe that Agua Hedionda Lagoon is a Key Area for Key Beneficial Uses and deserves to be restored and preserved as a body of water "with chemical, physical, and biological integrity."

Thank you for your consideration.

Jan Bandich

4529 Cove Drive #101, resident on the Agua Hedionda Lagoon

Carlsbad, CA 92008

[jbandich@att.net](mailto:jbandich@att.net)

May you always have: Love to share, Friends who care, and Health to spare.

**From:** J Cannon [mailto:blancofelis@earthlink.net]  
**Sent:** Monday, February 27, 2017 11:16 PM  
**To:** sandiego <sandiego@waterboards.ca.gov>  
**Subject:** Agenda--Comment - Tentative Resolution No. R9-2017-0030

Greetings—

I am requesting that Agua Hedionda Lagoon in Carlsbad CA be considered a top priority 303(d) listing for immediate restoration of this heavily used body of water.

For decades, agricultural fertilizers, pesticides and herbicides have been leaching into the lagoon from surrounding fields from slopes above. Many of these chemicals are long-lasting in the environment and some have since been banned because of proven toxicity to animals and plants which exceeded the advantages of their use.

The Encina Power Plant and its work yard has been operating on the southwest shore since 1954, storing and using various fossil fuels and other utility-related electrical fixtures that employed PCBs which were banned in the 1970s.

I have never known there to be any tests of whether or not any of these substances have entered the lagoon or surrounding soils and I think such a study is long overdue.

The Carlsbad Aquafarm company that commercially has raised shellfish for human consumption since 1990 is operating on a site originally founded as an aquaculture research facility in 1968 for San Diego State University--right next to the Encina plant.

According to [FishChoice.com](http://FishChoice.com) website:

*Carlsbad Aquafarm is located on an active, working waterfront set in the unspoiled Pacific Ocean waters of the Agua Hedionda Lagoon in Carlsbad, California. Each day over 600 million gallons of fresh seawater from the Pacific flows through the lagoon providing an exceptionally clean source of pristine seawater and nutrients for the shellfish to grow and thrive.*

<http://www.fishchoice.com/seafood-supplier/carlsbad-aquafarm-inc>

What with the agricultural runoff and unexamined possible exposure of the lagoon to electrical power plant chemicals, I question how

pristine this heavily used lagoon really is. Further, this flushing in of fresh water is sustained only by regular dredging operations which was once

the power company's job. The dredging responsibility recently was handed off to the Poseidon Water company which owns the new desal plant.

Just east of the I-5 overpass on the north shore of the lagoon, is Snug Harbor and Bristol Cove. Motor boating, water skiing and later jet skiing have been popular activities here since the 1960s. Gas and oil spillage and exhaust from motorized watercraft have no doubt been an additional burden on the health of the lagoon.

And finally, the Magdalena Ecke Family YMCA Aquatic Park is located just west of the I-5 freeway overpass in the middle section of the lagoon.

Agua Hedionda is the only lagoon in Carlsbad that allows swimming and boating activities. Each year, hundreds of children ages 6-12 years old stay at this camp in 5-day sessions, learning to kayak, swim and fish.

Now that Agua Hedionda Lagoon has been listed as impaired, it is of utmost importance that its water quality be restored to ensure the

health and safety of the thousands of people who swim in and eat food raised in these waters.

Thank you for considering that Agua Hedionda be a top priority of the SD Regional Water Board for restoration.

Janell Cannon

From: Jodi Good [mailto:goodjodi007@yahoo.com]  
Sent: Tuesday, February 28, 2017 5:41 AM  
To: sandiego <sandiego@waterboards.ca.gov>  
Subject: Agenda- comment on Tentative Resolution no. R9-2017-0030

Water board Members,

This is a request that the Agua Hedionda Lagoon in Carlsbad, California be moved to TOP PRIORITY 303(D) listing for immediate restoration.

I recently found out that the Agua Hedionda Lagoon has been listed as impaired, no thanks to the city of Carlsbad! It is extremely important that our lagoon be given top priority for immediate restoration.

There are three sections of the lagoon and many reasons why top priority is of utmost importance. The sections are superficial, because the lagoon is one body of water, not divided by I-5 or the train tracks. One body of water.

Eastern portion has long been polluted by herbicides, pesticides, and fertilizers running off from local farming and urban development. No swimming allowed, but skiing and light water craft is. Middle section is where the YMCA has, for decades, held summer camp for thousands of children with emphasis on swimming and water sports. For some reason the use of recreation (Table 8 of staff report) does not include the recreational use of the Agua Hedionda Lagoon where the camp is located. Pollution comes from freeway and railway runoff, not to mention Encina Power Plant pollution. Western section of Agua Hedionda hosts the fish hatchery and the only commercial shellfish growing farm in the area. The lagoon, jetties and shoreline are of key importance to local fish and shellfish consumption. After decades of SDG&E presence on and use of the Agua Hedionda Lagoon, there is reason for concern. After over fifty years in operation, we do not know the extent of pollution, in the soil let alone the water or sediment lying at the bottom of the lagoon, associated with the use of fossil fuel and storage facilities. Even the new Poseidon desalination plant has been accused of pollution infractions.

The health concerns alone should give reason to prioritize the cleanup of the Agua Hedionda Lagoon. We let children swim in it. We paddle board or ski in it. We eat the food produced in it. We live here.

Please prioritize the Agua Hedionda Lagoon.

Thank you,

Jodi Pendry Good  
2475 Jefferson #403  
Carlsbad, CA, 92008  
760.518.5017

Sent from my iPhone

**From:** Robin Hansen [mailto:mermama1@mac.com]  
**Sent:** Tuesday, February 28, 2017 8:09 AM  
**To:** sandiego <sandiego@waterboards.ca.gov>  
**Subject:** AGENDA RE: Tentative Resolution No. R9-2017-0030

I am writing to express my concern on behalf of the listing status of the Agua Hedionda Lagoon.

If, as stated in the Executive Summary:

"Key areas are the waters and places where protection and restoration of the integrity, or health, of waters is most important for a key beneficial use"

Then it must be noted that the Agua Hedionda Lagoon is unique in that its Key Beneficial Uses are high in number and critical in nature for the Board to consider and should be receiving PRIORITY ranking accordingly.

First, the AH Lagoon has been inadequately monitored historically and since it HAS been designated by the Regional Board as a 303(d) listed impaired water body AND

Second, a Key Beneficial use is as the only existing commercial shellfish cultivation operation in the San Diego region AND

Third, the AH lagoon is of special importance as a State Ecological Reserve (including its Eelgrass beds) AND

Fourth, though oddly, staff did not include the AH Lagoon in the REC-1 Beneficial Use, the lagoon has, in fact, been relied upon for YMCA Aquatic Park activities (while human health concerns exist involving children's summer camp activities in the lagoon water) As well, the inner lagoon is heavily used for recreation - and is utterly unique in the North County region.

It is understood that the Board faces difficult decisions regarding listing status due to resource limitations. My goal in communicating these points is to highlight that according to the Board's own guidelines, the Agua Hedionda Lagoon must receive Priority Ranking status.

Respectfully,

Robin Hansen

Carlsbad resident since 1960

**From:** Sean Kirkwood [mailto:sean@addisonsheetmetal.com]  
**Sent:** Tuesday, February 28, 2017 9:07 AM  
**To:** sandiego <sandiego@waterboards.ca.gov>  
**Subject:** Aqua Hedionda Lagoon

Good Morning Board members and staff, I am writing this letter to point out the special nature (Aqua Hedionda Lagoon) of this body of water. Of the 16 beneficial use for water bodies, AHL has 14 of the 16 and with the opening of the Poseidon desalination plant will have 15 of 16 uses to consider. To my understanding there are very few southern California water bodies that can say that. It is my feelings that due to these feature that AHL so have priority ranking in order to fix the toxic impairment that exists. This priority ranking should go hand in hand with an investigative order to stem the source of these toxins and return to water and sediment to natural levels. I have had the privilege of sitting in on 1 of your meetings and feel like the Board and staff have a daunting task with all the water bodies that need your attention. That is way a group of citizens like myself are trying to help in the task. Please consider my request and Thank you for all you do for our community.

Thank you,

Sean Kirkwood, President  
Addison Sheet Metal Inc.

Attached please find a comment letter for the above referenced sent on behalf of the San Diego County Water Authority.

*Jessica Hahn*

Senior Office Assistant

Water Resource Department

San Diego County Water Authority

(858) 522-6759

[jhahn@cdcwa.org](mailto:jhahn@cdcwa.org)



# San Diego County Water Authority

4677 Overland Avenue • San Diego, California 92123-1233  
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org

February 28, 2017

David Gibson, Executive Officer

California Regional Water Quality Control Board, San Diego Region

2375 Northside Drive, Suite 100

San Diego, CA 92108-2700

**Subject: Comment - Tentative Resolution No. R9-2017-0030**

Dear Mr. Gibson,

The San Diego County Water Authority appreciates the opportunity to comment on the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) Tentative Resolution No. R9-2017-0030, that endorses the February 15, 2017 staff report, “Key Beneficial Uses and Key Areas - Focusing on What is Most Important.” We recognize the challenges that the San Diego Water Board faces in protecting and enhancing the health of region’s waters with its limited resources, and applaud your efforts to focus on what is most important, both with the 2013 Practical Vision, and now with the Key Beneficial Uses and Key Areas concept. We strongly support adoption of the Tentative Resolution, with some minor recommended changes to the draft staff report.

The Water Authority is a wholesale water agency with 24 retail member agencies, serving a population of 3.3 million residents in San Diego County. The Water Authority’s mission is to provide a safe and reliable water supply to our member agencies. We support identification of drinking water supply as a key beneficial use in the San Diego region, and drinking water reservoirs and groundwater as key waterbodies for meeting this beneficial use.

Protection of drinking water supply and quality is very important to the Water Authority and to our member agencies. We are responsible for both the quality and the quantity of water supply that we deliver to our customers. Together with our member agencies, the Water Authority has pursued a diverse water supply portfolio for the region, that includes local supplies such as surface water, recycled water, brackish groundwater recovery, and in the future is likely to include potable reuse. While water agencies treat all water to meet stringent state and federal drinking water standards before delivering it to customers, source water of poor quality makes it increasingly expensive and difficult to

*A public agency providing a safe and reliable water supply to the San Diego region*

MEMBER AGENCIES

- Carlsbad Municipal Water District
- City of Del Mar
- City of Escondido
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
- Fallbrook Public Utility District
- Helix Water District
- Olivenhain Municipal Water District
- Otay Water District
- Padre Dam Municipal Water District
- Camp Pendleton Marine Corps Base
- Rainbow Municipal Water District
- Ramona Municipal Water District
- Rincon del Diablo Municipal Water District
- San Dieguito Water District
- Santa Fe Irrigation District
- South Bay Irrigation District
- Vallecitos Water District
- Valley Center Municipal Water District
- Vista Irrigation District
- Yuima Municipal Water District

OTHER REPRESENTATIVE

- County of San Diego

Mr. David Gibson  
February 28, 2017  
Page 2

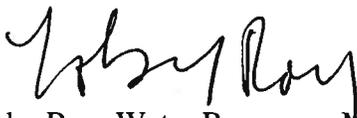
meet those standards. The Water Authority and our member agencies are working together to improve watershed awareness and management in support of a safe and reliable water supply for the region. Projection of water quality for drinking water supply is best supported through an integrated approach to water management that includes collaboration with local agencies for multiple benefits. This approach is exemplified through the San Diego Integrated Water Management Program.

We offer the following recommended changes to the staff report for your consideration:

- Identify the importance of an integrated approach to water management to maximize protection and restoration of the integrity of waters in the San Diego region (under IV. Applications, that begins on page 8).
- Identify collaboration with the water agencies as an important step to enhance and protect the water supply key beneficial use (page 11).
- In Table 3, include Hodges Reservoir as a drinking water supply reservoir directly connected to a water treatment plant & drinking water distribution system, and include San Luis Rey Basin as a groundwater basin intensively used for drinking water supply (page 16).
- In Table 4, provide the San Diego County Water Authority website that includes links to other member agency websites with reservoirs:  
<http://www.sdcwa.org/reservoirs-map> (page 17).
- In Table 4, provide the County of San Diego website on the Sustainable Groundwater Management Act as a source of information on groundwater basins  
<http://www.sandiegocounty.gov/pds/SGMA.html> (page 17).

Thank you for the opportunity to provide comments. Please contact Lesley Dobalian if you have any questions at (858)522-6747 or by email at [LDobalian@sdcwa.org](mailto:LDobalian@sdcwa.org).

Sincerely,



Toby Roy, Water Resources Manager

Sent via Electronic Mail to: [sandiego@waterboards.ca.gov](mailto:sandiego@waterboards.ca.gov)

**From:** maryanneviney@dslextreme.com [mailto:maryanneviney@dslextreme.com]  
**Sent:** Tuesday, February 28, 2017 10:00 AM  
**To:** sandiego <sandiego@waterboards.ca.gov>  
**Subject:** Comment - Tentative Resolution No. R9-2017-0030

Hello

My comments are attached for Tentative Resolution No. R9-2017-0030. Thank you for your consideration.

With kind regards,  
Mary Anne Viney  
Aqua Hedionda Lagoon Stakeholder group  
760-710-1425

Thank you for the opportunity to comment on Tentative Resolution No. R9-2017-0030, Resolution Supporting Use of the Key Beneficial Uses / Key Areas Concept to Help the San Diego Water Board Focus on What Is Most Important.

The Agua Hedionda Lagoon is a beloved and very popular lagoon, unique among lagoons within the Carlsbad Hydrologic Unit for its REC-1 and REC-2 beneficial uses, as well as for its industrial and commercial interests (note 13 out of 15 possible beneficial uses for the lagoon):

**Table 2-3. BENEFICIAL USES OF COASTAL WATERS**

Coastal Waters	Hydrologic Unit Basin Number	BENEFICIAL USE														
		I N D	N A V	R E C 1	R E C 2	C O M M	B I O L	E S T	W I L D	R A R E	M A R	A Q U A	M I G R	S P W N	W A R M	S H E L L
Pacific Ocean		●	●	●	●	●	●		●	●	●	●	●	●		●
Dana Point Harbor		●	●	●	●	●			●	●	●		●	●		●
Del Mar Boat Basin		●	●	●	●	●			●	●	●		●	●		●
Mission Bay		●		●	●	●		●	●	●	●		●	●		●
Oceanside Harbor		●	●	●	●	●			●	●	●		●	●		●
San Diego Bay <sup>1, 3</sup>		●	●	●	●	●	●	●	●	●	●		●	●		●
<b>Coastal Lagoons</b>																
Tijuana River Estuary	11.11			●	●	●	●	●	●	●	●		●	●		●
Mouth of San Diego River	7.11			●	●	●		●	●	●	●		●	●		●
Famosa Slough and Channel	7.11			●	●	●		●	●	●	●		●	●		●
Los Penasquitos Lagoon <sup>2</sup>	6.10			●	●		●	●	●	●	●		●	●		●
San Dieguito Lagoon	5.11			●	●		●	●	●	●	●		●	●		
Batiquitos Lagoon	4.51			●	●		●	●	●	●	●		●	●		
San Elijo Lagoon	4.61			●	●		●	●	●	●	●		●	●		
Agua Hedionda Lagoon	4.31	●		●	●	●	●	●	●	●	●	●	●	●		●

<sup>1</sup> Includes the tidal prisms of the Otay and Sweetwater Rivers.

<sup>2</sup> Fishing from shore or boat permitted, but other water contact recreational (REC-1) uses are prohibited.

<sup>3</sup> The Shelter Island Yacht Basin portion of San Diego Bay is designated as an impaired water body for dissolved copper pursuant to Clean Water Act section 303(d). A Total Maximum Daily Load (TMDL) has been adopted to address this impairment. See Chapter 3, Water Quality Objectives for Pesticides, Toxicity and Toxic Pollutants and Chapter 4, Total Maximum Daily Loads.

● Existing Beneficial Use

Table 2-3  
BENEFICIAL USES

The Staff Report has cited the following key beneficial uses / key areas for the lagoon:

- **Key Areas:** San Diego Region ocean waters, San Diego Bay, Mission Bay, Dana Point Harbor, Oceanside Harbor, and certain lagoons and estuaries, or parts thereof, are intensively used for fishing and/or shellfish harvesting, and many of the fish and shellfish taken are subsequently consumed by humans. **Agua Hedionda Lagoon is the location of the only existing commercial shellfish growing operation in the San Diego Region** (page 19 of the staff report).
- **Key Areas** for the Key Beneficial Use of Fish and Shellfish Consumption in the San Diego Region (Table 5 of staff report): The Agua Hedionda Lagoon jetties and the Agua

Hedionda Lagoon shoreline areas are of special importance for the **key beneficial use of FISH & SHELLFISH CONSUMPTION.**

- (It should also be noted that surfing is very popular along the where the so-called Agua Hedionda Lagoon “warm-water” jetties are located.)
- **Key Areas** for the Key Beneficial Use of Habitats and Ecosystems in the San Diego Region (Table 11 of staff report): Aqua Hedionda Lagoon areas of special importance for **the key beneficial use of HABITATS & ECOSYSTEMS: eelgrass beds in the lagoon; and the Agua Hedionda State Ecological Reserve.**
- However, note: **Key Areas for the Key Beneficial Use of Recreation in the San Diego Region** (Table 8 of staff report) **did not include** the REC-1 beneficial use for the Aqua Hedionda Lagoon, where potential human health concerns exist for the YMCA Aquatic Park activities, located at the middle lagoon portion, a children’s summer camp where swimming, fishing, kayaking and other aquatic activities are provided to many children, a vulnerable population, during the summer months.

Various Agua Hedionda Lagoon commercial and other beneficial uses are listed in the following brochure insert: [http://carlsbaddesal.com/websites/carlsbaddesal/images/lagoon\\_insert.pdf](http://carlsbaddesal.com/websites/carlsbaddesal/images/lagoon_insert.pdf)

The Agua Hedionda Lagoon has been recently listed by the San Diego Regional Water Quality Control Board as 303(d) impaired waterbody for sediment toxicity.

For this reason, and in light of the key beneficial uses / key areas noted in the Staff Report as well as intense public interest and use, and anthropogenic vulnerabilities, I’m requesting that the Agua Hedionda Lagoon be given priority ranking for restoration.

Sources indicate the lagoon receiving waters are subject to the following:

- **Tributary Inflow:** All three basins of the AHL experience tidal influence, and to a lesser extent drainage from the Agua Hedionda Creek.
- **Discharge Input:** All three basins of the lagoon receive discharge inputs from storm drains and transportation corridors.
- The lagoon has a **high number of beneficial uses** (13 out of 15 possible Beneficial Uses of Coastal Waters, Table 2-3) and the **outer, middle and eastern (inner) parts of the lagoon each have both recreational and habitat beneficial uses.**
- The outer, middle and eastern (inner) parts of the lagoon are **interconnected by channels, so each part has the potential to influence other parts of the lagoon.**

The lagoon was de-listed for bacteria and sedimentation around 2010, and it would be of interest to know if any bacteria and sedimentation follow-up testing has been done since the time of de-listing. Elevated levels of bacteria were found in the storm drain that discharges to the middle lagoon, where the YMCA Aquatic Camp is located, in 2008.

The Agua Hedionda Creek and Buena Creek, both ultimately drain into the Agua Hedionda Lagoon and both creeks are listed as 303(d) impaired water bodies for various pollutants, including indicator bacteria.

In the **Carlsbad Watershed Management Area Water Quality Improvement Plan**, [http://www.waterboards.ca.gov/sandiego/water\\_issues/programs/stormwater/docs/wqip/carlsbad/Accepted\\_Carlsbad\\_WQIP\\_2016\\_12\\_20.pdf](http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/wqip/carlsbad/Accepted_Carlsbad_WQIP_2016_12_20.pdf), it is stated that for the Agua Hedionda Watershed HA, the following pollutants are of high importance/ concern: bacteria/ pathogens, trash, heavy metals, nutrients, toxicity, oil and grease, riparian habitat, hydromodification impacts and sediments.

Thank you for your consideration of my request for priority ranking of the Agua Hedinda Lagoon for restoration.

With kind regards,  
Mary Anne Viney  
760-710-1425

**From:** Karen Holman [mailto:kholman@portofsandiego.org]  
**Sent:** Tuesday, February 28, 2017 12:00 PM  
**To:** sandiego <sandiego@waterboards.ca.gov>; Posthumus, Bruce@Waterboards <Bruce.Posthumus@waterboards.ca.gov>; Haas, Jeremy@Waterboards <Jeremy.Haas@waterboards.ca.gov>  
**Subject:** Agenda: Comment - Tentative Resolution No. R9-2017-0030

Dear Mr. Posthumus and Mr. Haas,

The San Diego Unified Port District (District) appreciates the opportunity to provide comments in response to the Tentative Resolution No. R9-2017-0030, *Resolution Supporting Use of the Key Beneficial Uses/Key Areas Concept to Help the San Diego Water Board Focus on What Is Most Important* (Tentative Resolution) as well as the corresponding Staff Report *Key Beneficial Uses and Key Areas: Focusing on What Is Most Important* (Staff Report). As the public trustee of San Diego Bay (Bay), the District shares a common interest with the San Diego Regional Water Quality Control Board (Regional Board) in ensuring the protection of the Bay's beneficial uses. The District supports the Regional Board's continued efforts to address water quality issues within the Bay, and remains committed to working collaboratively with the Regional Board to fulfill our agencies' shared goals.

The Notice of Opportunity for Public Comment was released two weeks prior to the comment submittal deadline which does not provide stakeholders ample time for review and comment. The Staff Report and Tentative Resolution specifically identifies several key areas and uses within San Diego Bay where regulatory decisions may be forthcoming. As such, it is critical that the District review the draft thoroughly.

In line with common practice, it is preferred by the District that public comment and review periods allow for a submittal period of at least 30 days from the release of the Notice of Opportunity for Public Comment. Engaging citizens and regulated parties to fully participate in the administrative decision making process is important for the Regional Board to fulfill their mission of protecting beneficial uses.

The District is committed to participating in and supporting the processes that assist in achieving our agencies' shared goal of improving the water quality and natural resources in San Diego Bay. The District will be submitting more detailed comments by the end of the week and respectfully requests that these be incorporated into the record because they are within the March 7, 2017 timeline identified in the public notice.

Respectfully,



**Karen Holman, Principal**

**Planning & Green Port**

**PORT OF SAN DIEGO**

3165 Pacific Highway • San Diego, CA 92101

O: 619.725-6073

Port administration offices are open Monday-Thursday and every other Friday from 8am-5pm.

This email is public information and may be viewed by third parties upon request.