



# City of Del Mar



October 26, 2009

***Via E-Mail***

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

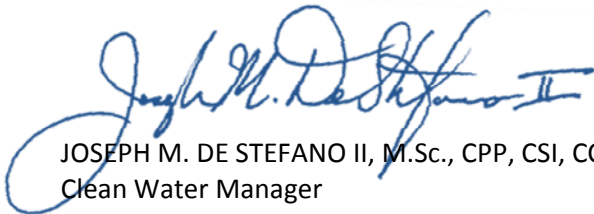
**CITY OF DEL MAR RECOMMENDATIONS FOR CHANGES TO THE CLEAN WATER ACT SECTIONS 305(B)  
AND 303(D) INTEGRATED REPORT FOR THE SAN DIEGO REGION**

Ms. Gorham-Test:

The City of Del Mar (City) appreciates the opportunity to provide the California Regional Water Quality Control Board, San Diego Region (Regional Board) with comments on the 305(b) and 303(d) Integrated Report in support of the 2008 updates. After careful review of the presented materials, the City is submitting the following comments for your consideration. These comments are presented in tabular format on the following pages, and are organized by water body and pollutant, in the order they appear in the Proposed Changes to the 2006 303(d) listing table. Please note that the City did not provide any information for the proposed listings, or de-listings, in circumstances where the City does not have any specific comments.

If you have any additional questions regarding the City's comments, please feel free to contact me directly by email at [jdestefano@delmar.ca.us](mailto:jdestefano@delmar.ca.us) or by phone at (858) 755-9313 x172.

Respectfully,



JOSEPH M. DE STEFANO II, M.Sc., CPP, CSI, CCIS™  
Clean Water Manager

JMD:ns

Attachment(s)

cc: Brian F. Mooney, AICP, Planning Director, Planning and Community Development Department  
Mikhail Ogawa, P.E., Mikhail Ogawa Engineering, Technical Consultant, City of Del Mar Clean Water  
Program  
File



References:

Regional Water Quality Control Board, San Diego Region. Water Quality Control Plan for the San Diego Basin. 1994, with amendments effective prior to April 25, 2007.

Weston Solutions. 2009. San Diego County Municipal Copermittees 2007-2008 Urban Runoff Monitoring Report. January 2009.

**Attachment – Table 1: City of Del Mar Comments on Draft 2008 California 305(b)/303(d) Integrated Report, Regional Board 9 (San Diego Region)**

Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
<p>San Dieguito River Toxicity Decision Recommendation: It is recommended that data noted as "Estimated; non-compliant with associated QAPP" not be included in any analysis because they do not meet quality standards. LOE 24991 should be updated to correctly reflect the number of samples and exceedances for each species</p>					
1	San Dieguito River (90511000)	Toxicity (17058)	24991	<p>This LOE states that it is based on the Urban Runoff Monitoring data collected in 2003. The LOE states: "Selenastrum capricornutum - Four samples were collected and four samples show significant toxicity levels (SL) as determined by the <i>Selenastrum capricornutum</i> growth test. <i>Ceriodaphnia dubia</i>- Four samples were collected and two samples show significant toxicity levels (SL) as determined by the <i>Ceriodaphnia dubia</i> survival/reproductive test. <i>Hyalella azteca</i> -Two samples were collected and neither show significant toxicity levels (SL) as determined by the <i>Hyalella azteca</i> growth and survival test according to results in the Surface Water Ambient Monitoring Program Annual Progress Report, 2007.</p> <p>Samples were collected in January, April, May and September 2003 and we have the following concerns:</p> <ul style="list-style-type: none"> <li>• This reference is cited incorrectly and refers to the SWAMP toxicity data of 2003.</li> <li>• Review of these SWAMP data indicates that four of four <i>Selenastrum</i> total cell count tests were toxic. However, one of the samples was noted to be "Estimated; non compliant with associated QAPP". <i>Hyalella</i> survival tests found that neither of the two samples was toxic. <i>Hyalella</i> growth tests showed two of the two samples were not toxic. Toxicity was only recorded in the <i>Ceriodaphnia</i> test where one of three samples was toxic to young/female and two of three samples were toxic to <i>Ceriodaphnia</i> survival.</li> </ul>	<ul style="list-style-type: none"> <li>• Please update the LOE to correctly reflect the number of exceedances and the number of samples.</li> <li>• Data noted as "Estimated; non-compliant with associated QAPP" should not be included in the assessment and therefore the total number of samples for <i>Selenastrum</i> should be three.</li> </ul>
<p>Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth Total Coliform Decision Recommendation: No comment</p>					

Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
2	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	3631	<ul style="list-style-type: none"> <li>• Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting.</li> <li>• Only addresses one <i>Enterococcus</i> exceedance which is not the pollutant of concern.</li> </ul>	<ul style="list-style-type: none"> <li>• Not clear that this LOE supports listing</li> </ul>
3	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26417	<ul style="list-style-type: none"> <li>• Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting.</li> <li>• States that there were no exceedances of water quality objectives.</li> </ul>	<ul style="list-style-type: none"> <li>• This LOE does not support listing</li> </ul>
4	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (9061 0000)	Total Coliform (16336)	26418	<ul style="list-style-type: none"> <li>• Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting.</li> <li>• States that there were no exceedances of water quality objectives for the calculated monthly geometric means for Anderson Canyon.</li> </ul>	<ul style="list-style-type: none"> <li>• This LOE does not support listing</li> </ul>

Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
5	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26428	<ul style="list-style-type: none"> <li>• Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting.</li> <li>• States that of 93 calculated geometric means for Los Peñasquitos, 2 exceeded. This gives a percentage of 2.15%.</li> </ul>	<ul style="list-style-type: none"> <li>• This LOE does not support listing</li> </ul>
6	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26416	<ul style="list-style-type: none"> <li>• States that no samples from Anderson Canyon exceeded the water quality objectives for Shellfish Harvesting.</li> </ul>	<ul style="list-style-type: none"> <li>• This LOE does not support listing</li> </ul>
7	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26427	<ul style="list-style-type: none"> <li>• Discusses the Beneficial Use of Water Contact Recreation.</li> <li>• States 11 out of 497 samples from Los Peñasquitos exceeded. This is 2.21% which is below the 4% exceedance percentage for listing coastal beaches from Section 3.3 of the Policy.</li> </ul>	<ul style="list-style-type: none"> <li>• This LOE does not support listing</li> </ul>