

**City of Escondido 303 (D) Listing Comments  
Draft Final Regional Board Staff Report, August 2009**

Comment #	Water Body Name (Water Body ID)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
1	Escondido Creek (90462000)	Manganese (5413)	8884	<ul style="list-style-type: none"> <li>• This LOE references that four of the eight samples taken exceed the secondary drinking water standard for manganese according to results in California's Surface Water Ambient Monitoring Report 2007. The secondary drinking water standard for manganese is 0.05 mg/L.</li> <li>• Escondido Creek's beneficial use classification as a municipal domestic water supply is not consistent with the historical use and ephemeral nature of this water body.</li> </ul>	<ul style="list-style-type: none"> <li>• Generally, the creek has low flows, with months of high flows due to rainfall typically occurring in January and February. It is recommended that the creek's beneficial use designation be re-considered.</li> </ul>
2	Escondido Creek (90462000)	Manganese (5413)	6240	<ul style="list-style-type: none"> <li>• .The LOE references two out of eight samples exceeded the water quality objective. These samples were collected by the City of Escondido's Livestream Discharge quarterly baseline monitoring program for the period 2003 through 2005. However, a persistent and prevalent factor that causes this exceedance is the concentration of manganese in Escondido's groundwater table.</li> <li>• The estimated surface groundwater contribution to Escondido Creek is an average of 5,230 acre feet per year (Attachment 1).</li> </ul>	<ul style="list-style-type: none"> <li>• Since groundwater contributions of manganese are readily introduced into the Creek's surface waters, especially during wet weather events, it is recommended that these recurring dynamics be considered (Attachment 1).</li> </ul>
3	Escondido Creek (90462000)	Total Dissolved Solids (5642)	3216	<ul style="list-style-type: none"> <li>• .One sample collected by the RWQCB9 in 1998. Sample was in exceedance.</li> <li>• A persistent and prevalent factor that causes this exceedance is the concentration of TDS in Escondido's groundwater.</li> <li>• The estimated surface groundwater contribution to Escondido Creek is an average of 5,230 acre feet per year (Attachment 1).</li> </ul>	<ul style="list-style-type: none"> <li>• Since groundwater contributions of TDS are readily introduced into the Creek's surface waters, especially during wet weather events, it is recommended that these recurring dynamics be considered (Attachment 1).</li> </ul>

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Comment #	Water Body Name (Water Body ID)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
4	Escondido Creek (90462000)	DDT (5414)	6231	<ul style="list-style-type: none"> <li>• Escondido Creek's beneficial use classification as a municipal domestic water supply is not consistent with the historical use and ephemeral nature of this water body.</li> <li>• Data reviewed was from the City of Escondido's Live Stream Discharge monitoring of Escondido Creek. Quarterly sampling occurred between 2004 and 2005. Six samples were collected and analyzed for pesticides; however, the detection limits were less than 5.0 ug/liter, well above the CTR criteria. From the CTR, the DDT criterion for protection of human health is 0.00059ug/L.</li> <li>• The detection limit cited, 0.00059, is not realistic based on the current confidence levels of analytical methodologies. APCL report (Attachment 2) data indicate that DDT concentrations are between 0.19 to 0.01 ug/L. Composite data for pesticides versus focus data for DDT were used. Focus DDT data indicates non-detect levels of less than 0.0021ug/L</li> </ul>	<ul style="list-style-type: none"> <li>• Generally, the creek has low flows, with months of high flows due to rainfall typically occurring in January and February. It is recommended that the creek's beneficial use designation be re-considered.</li> <li>• It is recommended that the APCL Analytical Report (Attachment 2) be evaluated relative to exceedance limitations.</li> <li>• LOE does not support listing.</li> </ul>
5	Escondido Creek (90462000)	Enterococcus (16460)	7364	<ul style="list-style-type: none"> <li>• Samples were collected at the mass loading station located near the lower boundary of the watershed under the Camino Del Norte Bridge east of Rancho Santa Fe Road along a natural channel in Encinitas from 2001 through 2006. Samples were collected during wet weather.</li> <li>• Analysis should consider counts that are generally elevated because of wet weather flows, particularly those associated with primary wet weather season storm events.</li> </ul>	<ul style="list-style-type: none"> <li>• LOE does not support listing</li> </ul>
6	Escondido Creek (90462000)	Sulfates (5781)	3243	<ul style="list-style-type: none"> <li>• Data were collected by DWR from 1998 to 2000. Four of 5 samples were in exceedance. According to the Basin Plan, for inland surface waters and all beneficial uses, the WQO for sulfate is 250 mg/L., which is not to be exceeded more than 10% of the time during any one-year period.</li> <li>• A persistent and prevalent factor that causes sulfate exceedances is the concentration of it in Escondido's groundwater.</li> <li>• Surface groundwater contributions to Escondido Creek are an average of 5,230 acre feet per year (Attachment 1).</li> </ul>	<ul style="list-style-type: none"> <li>• Since groundwater contributions of sulfates are readily introduced into the Creek's surface waters, especially during wet weather events, it is recommended that these recurring dynamics be considered (Attachment 1).</li> </ul>