

CITY OF SAN DIEGO 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
Category 5 Waters of the Proposed 2008 California §303(d) List of Water Quality Limited Segments					
Rose Creek Toxicity Decision Recommendation: It is recommended that this water body be listed as Category 3 in the 2008 305(b)/303(d) Integrated Report. Ambient and wet weather monitoring data are currently being collected through the Copermittee Regional Monitoring program and will be available for the assessment for the 2010 integrated list. The quality of the data used in the current assessment is questionable for <i>H. azteca</i> , and should not be included in the assessment. A decision to postpone listing this waterbody as Category 5 will allow for more current data to be incorporated into the assessment.					
1	Rose Creek (9064000)	Toxicity (17012)	30285	<ul style="list-style-type: none"> • SWAMP ambient toxicity testing (chronic) data were used in this LOE. The fact sheet states that four samples were collected between March 2002 and September 2002 and they showed significant toxicity levels (SL) in the following tests: <i>Hyalella azteca</i> survival and growth test - three of the four samples were toxic. However, <ul style="list-style-type: none"> ○ The data available in the SWAMP online database included only two samples. ○ Only two samples are available for the <i>Hyalella</i> growth analysis. The two <i>Hyalella</i> growth samples were collected on 4/24/02 and 6/5/02 and both pertain to sediment toxicity study data. Both samples are noted as “Estimated; non-compliant with associated QAPP”. Therefore, the samples do not meet the requirements of Section 6.1.4 of the Policy which states, “Data supported by a Quality Assurance Project Plan....are acceptable for use in developing the section 303(d) list”. Because the samples were not supported by their associated QAPP, they should not be used in the analysis. ○ Only two samples are available for the <i>Hyalella</i> survival analysis. Those samples were collected on 4/24/02 and 6/5/02 and both pertain to sediment toxicity study data. The sample from 6/5/02 was not significantly different compared to the negative control. Both samples are noted as “Estimated; non-compliant with associated QAPP”. Therefore, the samples do not meet the requirements of Section 6.1.4 of the Policy which states, “Data supported by a Quality Assurance Project Plan....are acceptable for use in developing the section 303(d) list”. Because the samples were not supported by their associated QAPP, they should not be used in the analysis. 	<ul style="list-style-type: none"> • All available data (two water samples and two sediment samples) are noted as “Estimated; non-compliant with associated QAPP”. This means that neither the water nor sediment samples are appropriate for inclusion in the listing assessment. Please remove them from the analysis. • Section 3.6 of the Policy states that water segments may be listed for statistically significant water or sediment toxicity. The section does not state that water and sediment toxicity results may be used together to list a water body. The sensitivity of test organisms to pollutants may be quite different in these two matrices; therefore, sediment and water toxicity results should not be combined. • Control data were not provided and these need to be evaluated in order to validate sample results.

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2	Rose Creek (9064000)	Toxicity (17012)	21389	<ul style="list-style-type: none"> • According to the LOE, samples were collected at Rose Creek station 906LPRSC4 from March 2002 to September 2002 and they showed significant toxicity levels (SL) in the following tests: Selenastrum algae growth test - three of the four samples. Ceriodaphnia dubia survival/reproductive test - two of the four samples were toxic. However, <ul style="list-style-type: none"> ○ Four samples are available for the Ceriodaphnia survival analysis. Those samples were collected on 3/13/02, 4/24/02, 6/5/02 and 9/18/02. Only the data from the 4/24/02 sample was found to be significant compared to the negative control. The three remaining samples were not significant. However, in the 4/24/02 sample, each of the ten replicates in the survival test died and there was no reproduction data available for any replicate. Even though test protocols may not require re-analysis of the sample, 100% mortality of all replicates may indicate an issue with sample handling or other cross-interference. This is especially true because the survival was 100% or nearly 100% for all other samples collected at the station. ○ Of the four samples analyzed using Selenastrum on the SWAMP database; three are significant compared to the control and one is not significant. 	<ul style="list-style-type: none"> • Only Selenastrum results support listing this water body as impaired for toxicity. • One of four Ceriodaphnia results was toxic, and not two of four. This discrepancy should be corrected in the database. • Toxicity endpoints and species should not be combined for listing decisions, as individual species are sensitive to different pollutants and the toxicity endpoints are indicative of different conditions. The scientific justification for this practice should be verified.
Tecolote Creek Nitrogen Decision Recommendation: The methodology for summing nitrogen species should be clarified and the number of exceedances corrected from 33 to 28.					
3	Tecolote Creek (90650000)	Nitrogen (16719)	7379	<ul style="list-style-type: none"> • This LOE is based on fixed station physical chemistry monitoring (SWAMP data) conducted in 2002. None of the three samples collected exceeded the water quality objective for total nitrogen. 	<ul style="list-style-type: none"> • This LOE does not support listing
4	Tecolote Creek (90650000)	Nitrogen (16719)	7192	<ul style="list-style-type: none"> • Based on fixed station physical chemistry monitoring (Urban Runoff Monitoring data) conducted between 1994 and 2006. The fact sheet states that thirty-three of 37 samples exceeded the water quality objective. However, total nitrogen was not measured in this monitoring program and the exceedances are assumed to be based on the sum of nitrate, nitrite and TKN. Of the 37 samples, nitrate and nitrite did not exceed their WQO between 1994 and 2006. No WQO for TKN is available for comparison. If the three nutrient values are summed to assess total nitrogen, and assuming a WQO of 1 mg/L, 28 samples exceeded. 	<ul style="list-style-type: none"> • The analysis results for total nitrogen should be corrected, and the methodology for summing the nitrogen species made clear. • It is recommended that number of exceedances be updated.

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5	Tecolote Creek (90650000)	Selenium (16718)	7579	<ul style="list-style-type: none"> The fact sheets state that this listing is based on three lines of evidence. However, only one line of evidence is presented. Three samples were collected in 2002 under the SWAMP program. All three samples were analyzed for dissolved selenium and exceeded the California Toxics Rule chronic water quality objective for total Selenium (5µg/L). Copermittee Regional Monitoring data were not included in the assessment. There were 41 samples collected between 1993 and 2007, zero of which exceeded the chronic condition total selenium criteria. Current monitoring data for ambient condition are being collected and will be available for the 2010 integrated report. 	<ul style="list-style-type: none"> The fact sheet should be updated to the correct number of LOEs (one). Selenium should be compared to the correct criteria; the criterion is for chronic total selenium. The data used in the assessment were acute dissolved selenium This water body should be listed as Category 3, there are not enough data to adequately assess the condition of the waterbody and not all currently available data were used in the assessment.
6	Soledad Canyon (90610000)	Selenium (17006)	7578	<ul style="list-style-type: none"> Four water samples were collected at Soledad Canyon Creek station 906LPSOL2 in March, April, June, and September 2002. Three samples showed excessive selenium concentration according to results in the Surface Water Ambient Monitoring Program Report, 2007. Sample results were between 7.6 µg/L and 9.5 µg/L. 	<ul style="list-style-type: none"> Selenium should be compared to the correct criteria; the criterion is for chronic total selenium. The data used in the assessment were acute dissolved selenium
7	Los Peñasquitos (90610000)	Enterococcus (16568)	7335	<ul style="list-style-type: none"> Fifteen of fifteen samples exceeded the maximum limit at 61 colonies per 100mL (RWQCB, 2007) which is derived from the US EPA criteria for water contact. 	<ul style="list-style-type: none"> No comment
8	Los Peñasquitos (90610000)	Fecal Coliform (16569)	7370	<ul style="list-style-type: none"> Eleven of 15 samples exceeded the WQO of 400 MPN/100mL. 	<ul style="list-style-type: none"> No comment

Los Peñasquitos Selenium Decision Recommendation: This water body should be listed as **Category 3**, current ambient monitoring data from the Copermittee Regional Monitoring program are not included in the assessment, and these data show no exceedances of chronic total selenium criteria. Additionally, wet weather data collected between November 2001 to February 2006 do not show any exceedances of chronic total selenium criteria. Finally, Selenium should be compared to the correct criteria; the criterion is for chronic total selenium.

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
9	Los Peñasquitos (90610000)	Selenium (16570)	7050	<ul style="list-style-type: none"> This LOE lists four samples, of which three exceeded CTR freshwater chronic total selenium criteria (5ug/L). These data were collected in 2002 under the SWAMP program and were analyzed for dissolved selenium. One of these samples (9/18/02) was noted "Estimated; non-compliant with associated QAPP" and therefore should not be included in the data assessment. Therefore only two samples out of three exceeded the WQO. Although only one line of evidence is required to list a constituent under section 3.6 of the Listing Policy, selenium samples collected in the intervening seven years have not been assessed. The Copermittees Regional Monitoring Program (2007-2008) should be considered for inclusion, as a more robust and recent data set. During ambient monitoring in the fall of 2007 and the spring of 2008, there were no exceedances of the CTR total selenium criteria at three stations and two events (six samples in total). 	<ul style="list-style-type: none"> It is recommended that the dataset be updated to exclude the sample noted as out of compliance with the QAPP. In addition, it is recommended that recent ambient data collected through the Copermittee Regional Monitoring Program be incorporated into the listing assessment. Selenium should be compared to the correct criteria; the criterion is for chronic total selenium. The data used in the assessment were acute dissolved selenium Recent ambient data and wet weather data show that there is no problem with selenium. It is recommended it be categorized as a Category 3 waterbody at this time.
10	Los Peñasquitos (90610000)	Selenium (16570)	26869	<ul style="list-style-type: none"> None of the fifteen dissolved selenium samples collected exceed the water quality objective according to results in the San Diego County Municipal Copermittees Urban Runoff Monitoring Report, January 2007. Samples were collected in November 2001 to February 2006. 	<ul style="list-style-type: none"> The CTR states that the selenium criteria apply to total selenium, and dissolved selenium should not be assessed using standard benchmarks due to the bioaccumulative nature of the substance. Selenium should be compared to the correct criteria; the criterion is for chronic total selenium. The data used in the assessment were acute dissolved selenium
Los Peñasquitos Total Nitrogen Decision Recommendation: The methodology used to calculate total nitrogen should be articulated in the Fact Sheet.					
11	Los Peñasquitos (90610000)	Total Nitrogen (16696)	8813	<ul style="list-style-type: none"> One of 4 samples collected exceeded the water quality objective according to results in the Surface Water Ambient Monitoring Program Urban Runoff Monitoring Report, January 2007. Samples were collected on March 13, April 24, June 5, and September 18, 2002. 	<ul style="list-style-type: none"> No comment

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12	Los Peñasquitos (90610000)	Total Nitrogen (16696)	7336	<ul style="list-style-type: none"> The fact sheet states that 15 of 15 samples exceeded the total nitrogen criteria of 1 mg/L. However, total nitrogen was not measured in this monitoring program and the exceedances are assumed to be based on the sum of nitrate, nitrite and TKN. If the monitoring results from November 2001 through February 2008 are assessed, meaning that nitrate, nitrite, and total kjeldahl nitrogen are summed, then 18 of 20 samples exceed the Basin Plan criteria of 1 mg/L. 	<ul style="list-style-type: none"> The methodology used to calculate total nitrogen should be stated.
Los Peñasquitos Toxicity Decision Recommendation: No comment					
13	Los Peñasquitos (90610000)	Toxicity (16567)	26872	<ul style="list-style-type: none"> Fifteen storm water samples were collected and used to test for toxicity to Selenastrum, Ceriodaphnia dubia, and Hyalella azteca. None of the samples for any species or test were found to be toxic. 	<ul style="list-style-type: none"> This LOE does not support listing
14	Los Peñasquitos (90610000)	Toxicity (16567)	21387	<ul style="list-style-type: none"> Four ambient water samples were collected at one station during 2002. The samples were used to test for toxicity to Selenastrum and Ceriodaphnia dubia. Three of the Selenastrum and one of the four Ceriodaphnia samples were found to be toxic. 	<ul style="list-style-type: none"> No comment
15	Chollas Creek (90822000)	Phosphorus (116712)	6161	<ul style="list-style-type: none"> The LOE states 39 of 40 samples exceeded the Basin Plan WQO of 0.1 mg/L based on data collected at the MLS under the Urban Runoff Monitoring program between 1994 and 2006. 	<ul style="list-style-type: none"> No comment
Chollas Creek Total Nitrogen Decision Recommendation: No comment					
16	Chollas Creek (90822000)	Total Nitrogen (16713)	7363	<ul style="list-style-type: none"> One sample was collected under the SWAMP program in June 2006. This sample exceeded the WQO. 	<ul style="list-style-type: none"> No comment
17	Chollas Creek (90822000)	Total Nitrogen (16713)	6728	<ul style="list-style-type: none"> This LOE states that 37 of 39 samples exceeded Basin Plan WQO based on wet weather data collected under the Urban Runoff Monitoring Program between 1994 and 2006. 	<ul style="list-style-type: none"> No comment
Mission Bay at Quivira Basin Copper Decision Recommendation: No comment					
18	Mission Bay at Quivira Basin (90752000)	Copper (17484)	30279	<ul style="list-style-type: none"> This LOE states that three samples were collected under the Regional Harbor Monitoring Pilot Program. Two of the three samples exceeded the acute criteria (4.8 ppb) and all three exceeded the chronic criteria (3.1 ppb). All three samples, analyzed for total, dissolved and sediment, were above WQOs for copper. 	<ul style="list-style-type: none"> No comment
19	Mission Bay at Quivira Basin (90752000)	Copper (17484)	30280	<ul style="list-style-type: none"> The mean of the three water column samples (therefore one sample location) exceeded the chronic water quality objective but not the acute water quality objective. 	<ul style="list-style-type: none"> No comment

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20	Miramar Reservoir (90610000)	Ammonia as N (16694)	6161	<ul style="list-style-type: none"> A total of 23 samples were analyzed between January 2005 and December 2006. Of these samples, 13 were below detection limit of 0.031 mg/L and were not included in the LOE. While the remaining ten samples exceeded the WQO of 0.025mg/L, this WQO is based on the Basin Plan level for un-ionized ammonia. The samples were analyzed for ammonia as nitrogen. The U.S EPA WQO for ammonia is based on a combined assessment of temperature, pH and conductivity and provides a better assessment of chronic and acute toxicity for ammonia. 	<ul style="list-style-type: none"> Samples should not be removed from analysis because they are non-detects. Ammonia as nitrogen should be compared to acute criteria using the EPA method* that incorporates temperature, pH, and conductivity and not compared to the standard for un-ionized ammonia. This listing assessment should be re-evaluated using the correct criteria. *(U.S. EPA, 1999 Update of Ambient Water Quality Criteria for Ammonia, EPA-822-R-99-014, December 1999) This LOE ID (6161) is repeated, the same LOE ID is used in conjunction with decision number 116712.
21	Miramar Reservoir (90610000)	Total Nitrogen as N (16695)	6162	<ul style="list-style-type: none"> LOE states that 26 of 28 samples exceeded the WQO. 	<ul style="list-style-type: none"> No comment

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22	Paleta Creek (90831000)	Total Chromium (16907)	7164	<ul style="list-style-type: none"> This LOE states that two of 32 samples exceeded the acute WQO and four of 32 samples exceeded the chronic WQO for total chromium. The samples were collected from one monitoring station in 2007. However, these data were not available for verification in the "Monitoring and Modeling of Chollas, Paleta and Switzer Creeks" report (SCCWRP, 2007). The sample size for this assessment is stated as 64, however the number of samples is 32, and they were compared to two criteria. This does not make the sample size 64. In fact, if a sample exceeded both the chronic and acute criteria, this should not count as a double exceedance. As the samples were grab samples, and not composited over a long period of time, the acute criteria should only apply. Therefore, 2 of 32 samples exceed criteria. Additionally, these data were collected at one station during three storm events. According to the Water Quality Policy, Section 6.1.5.3, data collected "...on a single day or during a single short-term natural event (e.g., a storm, flood, or wildfire), the data shall not be used as the primary data set supporting the listing decision". 	<ul style="list-style-type: none"> Please make these data publicly available Multiple samples from three storm events were used in this listing assessment; however, they were included in the assessment as discrete and representative samples. They should be aggregated by event (perhaps an EMC or other) and assessed that way. Individual grab samples should be compared to the acute criteria ONLY, and therefore the number of exceedances would be 2 of 32. This is below the allowable number of 3 exceedances. It is recommended that this waterbody/pollutant combination NOT be listed on the 2008 §303d list.
23	Paleta Creek (90831000)	Copper (16909)	7166	<ul style="list-style-type: none"> 27 of 32 samples exceeded the acute WQO and 31 of 32 samples exceeded the chronic WQO for copper. These copper concentrations were above the WQO. Comparing the same sample to both the acute and chronic criteria does not double the sample size. 	<ul style="list-style-type: none"> Please update the sample size to 32 samples, not 64.
24	San Diego Bay Shoreline at Spanish Landing (90821000)	Total Coliform (17002)	27268	<ul style="list-style-type: none"> 39 of 231 samples exceeded the shellfish standard for Total Coliform. The allowable number of exceedances is 38. 	<ul style="list-style-type: none"> No comment
25	Lake Hodges (90521000)	Ammonia as N (16474)	6159	<ul style="list-style-type: none"> LOE is based on drinking water quality monitoring samples for Ammonia as N collected by the Water Department between 2005 and 2006. Exceedances were based on the Basin Plan un-ionized ammonia criteria of 0.025mg/L. Thirteen of the 18 samples exceeded this WQO. The EPA criteria for ammonia should be used for assessing the potential impairment of beneficial uses. This criterion is based on assessment of pH, temperature and conductivity in conjunction with un-ionized ammonia concentrations. 	<ul style="list-style-type: none"> It is recommended that ammonia as nitrogen be compared to acute criteria using the EPA method* that incorporates temperature, pH, and conductivity and not compared to the standard for un-ionized ammonia. *(U.S. EPA, 1999 Update of Ambient Water Quality Criteria for Ammonia, EPA-822-R-99-014, December 1999)

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26	Murray Reservoir (90711000)	Ammonia as N (17107)	6167	<ul style="list-style-type: none"> This LOE is based on drinking water quality monitoring samples for Ammonia as N collected by the Water Department between 2005 and 2006. Exceedances were based on the Basin Plan un-ionized ammonia criteria of 0.025mg/L. All ten samples exceeded this WQO. The EPA criteria for ammonia should be used for assessing the potential impairment of beneficial uses. This criterion is based on assessment of pH, temperature and conductivity in conjunction with un-ionized ammonia concentrations. 	<ul style="list-style-type: none"> It is recommended that ammonia as nitrogen be compared to acute criteria using the EPA method* that incorporates temperature, pH, and conductivity and not compared to the standard for un-ionized ammonia. *(U.S. EPA, 1999 Update of Ambient Water Quality Criteria for Ammonia, EPA-822-R-99-014, December 1999)
27	Murray Reservoir (90711000)	Nitrogen (16330)	6169	<ul style="list-style-type: none"> This listing is based on one LOE with 22 of 28 samples exceeding Basin Plan 	<ul style="list-style-type: none"> No comment
<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>					
28	San Dieguito River (90511000)	Toxicity (17058)	7492	<ul style="list-style-type: none"> This LOE is based on the Urban Runoff Monitoring data collected between 2001 and 2006. The LOE indicated that six of 15 samples collected were toxic to the <i>Ceriodaphnia dubia</i> survival/reproductive test. None of the 15 samples collected for <i>Hyalella azteca</i> survival were found to be toxic. Five of fifteen <i>Selenastrum capricornutum</i> samples were found to be toxic in the growth test. 	<ul style="list-style-type: none"> No comment
29	San Dieguito River (90511000)	Toxicity (17058)	24991	<ul style="list-style-type: none"> This LOE states that it is based on the Urban Runoff Monitoring data collected in 2003. The LOE states: “<i>Selenastrum capricornutum</i>- 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. Samples were collected in January, April, May and September 2003 and we have the following concerns: <ul style="list-style-type: none"> This reference is cited incorrectly and refers to the SWAMP toxicity data of 2003. 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. 	<ul style="list-style-type: none"> Please update the LOE to correctly reflect the number of exceedances and the number of samples. 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.

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Tijuana River Total Nitrogen as N Decision Recommendation: Total nitrogen as N was not measured for LOE 7384 or 7873. Please provide data for LOE 7384 and provide methodology for the calculation of total nitrogen as N for LOE ID 7383.					
30	Tijuana River (91111000)	Total Nitrogen as N (16916)	7384	<ul style="list-style-type: none"> The LOE states that this is based on two samples of two exceeding Basin Plan WQOs. However, analysis of the SWAMP data shows that there is no measured total nitrogen data for the Tijuana River 5 Monitoring Station. Only TKN was measured at this site; neither nitrate nor nitrite were measured therefore total nitrogen cannot be assessed. 	<ul style="list-style-type: none"> Please provide additional rationale for this recommended listing, provide the total nitrogen data used, or move to Category 3 listing.
31	Tijuana River (91111000)	Total Nitrogen as N (16916)	7383	<ul style="list-style-type: none"> This LOE is based on the Urban Runoff Monitoring Program which does not assess total nitrogen. Nitrate concentrations were above the Basin Plan WQO in one of the 15 samples, all nitrate data were below the WQO. No WQO is available for TKN. 	<ul style="list-style-type: none"> Please provide methodology or note of how the total nitrogen results were obtained.
Tijuana River Toxicity Decision Recommendation: No comment					
32	Tijuana River (91111000)	Toxicity (16671)	7507	<ul style="list-style-type: none"> This LOE states that the five of 15 samples collected were found to be toxic for <i>Hyalella azteca</i> growth and survival. All 15 samples were toxic to <i>Ceriodaphnia dubia</i>. Results were from the San Diego County Municipal Copermitees Annual Progress Report, 2007. -Sites: TJ MLS and Hollister Street Bridge, Jan 2002 to Feb 2006. 	<ul style="list-style-type: none"> No comment
33	Tijuana River (91111000)	Toxicity (16671)	25808	<ul style="list-style-type: none"> This LOE states that 2 of 2 samples collected were found to be toxic for <i>Hyalella azteca</i> survival and growth, for site Tijuana River 5, lat/long: 32.55132, -117.08439 on May 31, 2005 and April 10, 2006. Samples and results confirmed – compliant with QAPP. Supplemental data available for Tecate Creek (911TTET02). 	<ul style="list-style-type: none"> No comment
34	Tijuana River (91111000)	Toxicity (16671)	30292	<ul style="list-style-type: none"> This LOE states that 1 of 2 samples collected was found to be toxic for <i>Selenastrum capricornutum</i> algae growth and <i>Ceriodaphnia dubia</i> survival and reproduction for site Tijuana River 5, lat/long: 32.55132, -117.08439 on May 31, 2005 and April 10, 2006. Samples and results confirmed – compliant with QAPP. Supplemental data available for Tecate Creek (911TTET02). 	<ul style="list-style-type: none"> No comment
35	Sweetwater River (90931000)	Enterococcus (16919)	7184	<ul style="list-style-type: none"> One LOE is provided for enterococcus based on Urban Runoff Monitoring Program with all 15 samples exceeding WQO for enterococcus. Reassessment of these data confirms that 15 exceedances occurred based on the WQO of 61 MPN/100mL. 	<ul style="list-style-type: none"> No comment
36	Sweetwater River (90931000)	Fecal Coliform (16920)	7376	<ul style="list-style-type: none"> One LOE is provided for enterococcus based on Urban Runoff Monitoring Program with 13 of 15 samples exceeding WQO for fecal coliform. Reassessment of these data confirms that 13 exceedances occurred. 	<ul style="list-style-type: none"> No comment
Sweetwater River Phosphorus Decision Recommendation: No comment					

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37	Sweetwater River (90931000)	Phosphorus (16784)	7377	<ul style="list-style-type: none"> Four samples were collected under the SWAMP program, of which zero exceeded. 	<ul style="list-style-type: none"> This LOE does not support listing
38	Sweetwater River (90931000)	Phosphorus (16784)	7186	<ul style="list-style-type: none"> 15 of 15 samples collected under the Urban Runoff Monitoring Program exceeded the Basin Plan WQO of 0.1 mg/L. 	<ul style="list-style-type: none"> No comment
<p>Sweetwater River Toxicity Decision Recommendation: The distance between the Sweetwater River 3 and Sweetwater River 8 sampling sites is approximately 27 miles, but the water segment listing is for 50 miles. Section 6.1.5.4 of the Policy states that, "data shall be aggregated by water body segments as defined in the Basin Plans." Please update the water body definition to reflect two separate water bodies. The Water Quality Listing Policy states that a minimum of two exceedances is necessary to list a waterbody/pollutant combination on the 303(d) list. The upstream water body (Sweetwater River station 3) should not be listed for toxicity, as one of four water samples showed toxicity, and zero of one sediment samples showed toxicity. This does not meet the minimum requirements for listing.</p>					
39	Sweetwater River (90931000)	Toxicity (16800)	7506	<ul style="list-style-type: none"> Data from the Copermitttee Regional Monitoring program were assessed. Eight of 15 samples were found to be toxic. Seven of 15 samples were found to be toxic to Selenastrum, five of 15 tests were toxic to Ceriodaphnia dubia, and no samples were toxic to <i>H. azteca</i>. 	<ul style="list-style-type: none"> No comment
40	Sweetwater River (90931000)	Toxicity (16800)	25673	<ul style="list-style-type: none"> Eight water samples from two locations within the Sweetwater River were collected and used to test for toxicity to Selenastrum, Ceriodaphnia, and Hyalella. The distance between the two sample locations is approximately 27 miles, and therefore the sample results are evaluated separately here. At the upstream location (Sweetwater River station 3) one of four sample results was toxic to Ceriodaphnia for reproduction. Selenastrum and Ceriodaphnia percent survival were not affected (zero of four samples). Three of four samples at Sweetwater River station 8 were toxic to Selenastrum, but not for Ceriodaphnia survival or reproduction, or Hyalella survival. 	<ul style="list-style-type: none"> The distance between the Sweetwater River 3 and Sweetwater River 8 sampling sites is approximately 27 miles, but the water segment listing is for 50 miles. Section 6.1.5.4 of the Policy states that, "data shall be aggregated by water body segments as defined in the Basin Plans." In addition, the Policy states that at a minimum the RWQCBs should identify stream reaches that may have different pollutant levels based on differences in land use, tributary inflow, or discharge input. Therefore, two separate reaches of the waterbody should be listed, not 50 miles.

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
41	Sweetwater River (90931000)	Toxicity (16800)	30291	<ul style="list-style-type: none"> The fact sheet states that five sediment samples were collected at stations Sweetwater River stations 3 and 8 and assessed for toxicity to <i>Hyaella azteca</i>. However, the data included in the SWAMP online database included only one sample at each location. Sweetwater River station 3 toxicity results show no toxicity to <i>Hyaella</i> for either survival or growth. There is one exceedance for <i>Hyaella</i> growth at Sweetwater River station 8. 	<ul style="list-style-type: none"> Sweetwater River 8 is in hydrological sub area (HSA) 909.12, and Sweetwater River 3 is in HSA 909.31. It is recommended that the water segment be changed to reflect the data assessment results at the two monitoring stations. Section 6.1.5.4 of the Water Quality Policy states that, "data shall be aggregated by water body segments as defined in the Basin Plans." In addition, one of four ambient samples and zero of one sediment samples exceeded toxicity criteria at Sweetwater River 3, and this is below the number required to list the water segment on the Draft 2008 303(d) list. Therefore, the listing location should be changed to the reach located at Sweetwater River 8 where 3 of 4 samples were toxic to <i>Selenastrum</i> and one of one samples were toxic for <i>Hyaella</i> growth in sediment.
42	San Vicente Reservoir (90721000)	Ammonia as N (17082)	6174	<ul style="list-style-type: none"> Exceedances were based on the Basin Plan un-ionized ammonia criteria of 0.025mg/L. Four of the 24 samples exceeded this WQO. The EPA criteria for ammonia should be used for assessing the potential impairment of beneficial uses. This criterion is based on assessment of pH, temperature and conductivity in conjunction with un-ionized ammonia concentrations. 	<ul style="list-style-type: none"> It is recommended that ammonia as nitrogen be compared to acute criteria using the EPA method* that incorporates temperature, pH, and conductivity and not compared to the standard for un-ionized ammonia. *(U.S. EPA, 1999 Update of Ambient Water Quality Criteria for Ammonia, EPA-822-R-99-014, December 1999)
43	San Vicente Reservoir (90721000)	Total Nitrogen as N (17084)	6173	<ul style="list-style-type: none"> Thirty-two of 37 samples exceed the criteria for total nitrogen 	<ul style="list-style-type: none"> No comment

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
44	El Capitan Lake (90731000)	Phosphorus (17600)	6158	<ul style="list-style-type: none"> Six of seven samples exceed criteria for total phosphorus 	<ul style="list-style-type: none"> No comment
45	El Capitan Lake (90731000)	Total Nitrogen as N (17602)	6157	<ul style="list-style-type: none"> Thirty of 35 samples exceed the criteria for total nitrogen 	<ul style="list-style-type: none"> No comment
46	Switzer Creek (90822000)	Copper		<ul style="list-style-type: none"> No Fact Sheet 	<ul style="list-style-type: none"> Please provide fact sheets for this listing or remove from Category 5.
47	Switzer Creek (90822000)	Nickel		<ul style="list-style-type: none"> No Fact Sheet 	<ul style="list-style-type: none"> Please provide fact sheets for this listing or remove from Category 5.
48	Switzer Creek (90822000)	Zinc		<ul style="list-style-type: none"> No Fact Sheet 	<ul style="list-style-type: none"> Please provide fact sheets for this listing or remove from Category 5.
49	San Diego River (lower) (90711000)	Enterococcus		<ul style="list-style-type: none"> No Fact Sheet 	<ul style="list-style-type: none"> Please provide fact sheets for this listing or remove from Category 5.
50	San Diego River (lower) (90711000)	Nitrogen		<ul style="list-style-type: none"> No Fact Sheet 	<ul style="list-style-type: none"> Please provide fact sheets for this listing or remove from Category 5.
Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth Total Coliform Decision Recommendation: No comment					
51	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	3631	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. Only addresses one Enterococcus exceedance which is not the pollutant of concern. 	<ul style="list-style-type: none"> Not clear that this LOE supports listing
52	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	28190	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. States that Health Advisories were posted on the beaches for 35 Exceedances out of 2555 Samples. This gives an exceedance percentage of 1.37% which is below the 4% exceedance percentage for coastal beaches from section 3.3 of the Policy. 	<ul style="list-style-type: none"> This LOE does not support listing

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
53	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26417	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. States that there were no exceedances of water quality objectives. 	<ul style="list-style-type: none"> This LOE does not support listing
54	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26418	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. States that there were no exceedances of water quality objectives for the calculated monthly geometric means for Anderson Canyon. 	<ul style="list-style-type: none"> This LOE does not support listing
55	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26428	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. States that of 93 calculated geometric means for Los Peñasquitos, 2 exceeded. This gives a percentage of 2.15%. 	<ul style="list-style-type: none"> This LOE does not support listing
56	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26429	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. Addresses exceedances from storm events only which are isolated events and not indicative of a persistent exceedance of water quality objectives. 	<ul style="list-style-type: none"> No comment
57	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26416	<ul style="list-style-type: none"> States that no samples from Anderson Canyon exceeded the water quality objectives for Shellfish Harvesting. 	<ul style="list-style-type: none"> This LOE does not support listing

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
58	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26426	<ul style="list-style-type: none"> Sixteen of 21 samples exceed shellfish standards 	<ul style="list-style-type: none"> No comment
59	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26427	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation. 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. 	<ul style="list-style-type: none"> This LOE does not support listing
60	Pacific Ocean Shoreline, Miramar Reservoir HA, at Los Peñasquitos mouth (90610000)	Total Coliform (16336)	26425	<ul style="list-style-type: none"> This dataset includes the storm event samples and exceedances. There were 120 exceedances and 497 samples (24%). 	<ul style="list-style-type: none"> No comment
<p>Pacific Ocean Shoreline, Scripps HA at Avenida de la Playa at La Jolla Shores Beach Total Coliform Decision Recommendation: The Shellfish beneficial use should not be applied to this waterbody, because it was designated as an ASBS prior to San Diego Basin Plan beneficial use designations, and therefore is subject to an existing institutional control. Comparison of Total Coliform to Water Contact Recreation standards indicates that this water body/pollutant combination is not eligible for 303(d) listing at this time. It is recommended that this waterbody/pollutant combination not be included as a Category 5 decision on the 305(b)/303(d) 2008 Integrated Report.</p>					
61	Pacific Ocean Shoreline, Scripps HA at Avenida de la Playa at La Jolla Shores Beach (90630000)	Total Coliform (16825)	29151	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. 1 out of 49 geometric means exceeded which is within the allowable frequency. 	<ul style="list-style-type: none"> This LOE does not support listing

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
62	Pacific Ocean Shoreline, Scripps HA at Avenida de la Playa at La Jolla Shores Beach (90630000)	Total Coliform (16825)	29177	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. 23 out of 2555 samples exceeded for beach postings which is below the allowable frequency of 4% for coastal beaches from section 3.3 of the Policy. 	<ul style="list-style-type: none"> This LOE does not support listing
63	Pacific Ocean Shoreline, Scripps HA at Avenida de la Playa at La Jolla Shores Beach (90630000)	Total Coliform (16825)	29150	<ul style="list-style-type: none"> Discusses the Beneficial Use of Water Contact Recreation, not Shellfish Harvesting. 2 out of 213 samples exceeded which is below the allowable listing frequency. 	<ul style="list-style-type: none"> This LOE does not support listing
64	Pacific Ocean Shoreline, Scripps HA at Avenida de la Playa at La Jolla Shores Beach (90630000)	Total Coliform (16825)	29149	<ul style="list-style-type: none"> Seven of nine samples exceeded the Shellfish harvesting standard This area is a California Ocean Plan designated ASBS, designated April 18, 1974 (Resolution No. 74-32) and June 19, 1975 (Resolution No. 75-61). This ASBS designation was made prior to the original November 28, 1975 San Diego Basin Plan shellfish beneficial use designation. As an ASBS the collection of shellfish or any other life, is strictly prohibited and enforced. At this time the California Department of Fish and Game (CDFG) is recommending expansion of the protection of the ASBS under the Marine Life Protection Act. The City of San Diego is recommending the removal of this listing because the shellfish beneficial use does not and will not occur in the ASBS, because it was designated an ASBS prior to the original Basin Plan shellfish designation and is therefore under an existing institutional control. 	<ul style="list-style-type: none"> This LOE should not be included in the assessment
65	Pacific Ocean Shoreline, Scripps HA at Avenida de la Playa at La Jolla Shores Beach (90630000)	Total Coliform (16825)	29152	<ul style="list-style-type: none"> Zero of nine samples exceed the Water Contact Recreation standard. 	<ul style="list-style-type: none"> This LOE does not support listing

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
66	Pacific Ocean Shoreline, Scripps HA at Avenida de la Playa at La Jolla Shores Beach (90630000)	Total Coliform (16825)	29148	<ul style="list-style-type: none"> Twenty-nine of 213 samples exceed the shellfish standard. This is below the number of allowable exceedances of 35. The assessment results do not support listing This area is a California Ocean Plan designated ASBS, designated April 18, 1974 (Resolution No. 74-32) and June 19, 1975 (Resolution No. 75-61). This ASBS designation was made prior to the original November 28, 1975 San Diego Basin Plan shellfish beneficial use designation. As an ASBS the collection of shellfish or any other life, is strictly prohibited and enforced. At this time the California Department of Fish and Game (CDFG) is recommending expansion of the protection of the ASBS under the Marine Life Protection Act. The City of San Diego is recommending the removal of this listing because the shellfish beneficial use does not and will not occur in the ASBS, because it was designated an ASBS prior to the original Basin Plan shellfish designation and is therefore under an existing institutional control. 	<ul style="list-style-type: none"> This LOE should not be included in the listing assessment
Pacific Ocean Shoreline, Scripps HA at Children’s Pool Total Coliform Decision Recommendation: Please provide the data used to make this recommended listing.					
67	Pacific Ocean Shoreline, Scripps HA at Children’s Pool (90630000)	Indicator Bacteria (17509)	30337	<ul style="list-style-type: none"> This LOE is a placeholder to support a 303(d) listing decision made prior to 2006. Does not include any supporting data. 	<ul style="list-style-type: none"> Please provide additional information on bacteria concentrations
68	Pacific Ocean Shoreline, Scripps HA at Children’s Pool (90630000)	Indicator Bacteria (17509)	30195	<ul style="list-style-type: none"> This beach was on a year round beach advisory due to the presence of marine mammals and the resulting potential to have high bacteria. It is not clear if there is bacteria data to support listing this location. 	<ul style="list-style-type: none"> Please provide additional information on bacteria concentrations
Pacific Ocean Shoreline, Scripps HA, at La Jolla Cove Total Coliform Decision Recommendation: The Shellfish beneficial use should not be applied to this waterbody, because it was designated as an ASBS prior to San Diego Basin Plan beneficial use designations, and therefore is subject to an existing institutional control. Comparison of Total Coliform to Water Contact Recreation standards indicates that this water body/pollutant combination is not eligible for 303(d) listing at this time. It is recommended that this waterbody/pollutant combination not be included as a Category 5 decision on the 305(b)/303(d) 2008 Integrated Report.					

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
69	Pacific Ocean Shoreline, Scripps HA, at La Jolla Cove (90630000)	Total Coliform (16842)	29226	<ul style="list-style-type: none"> Fifty-nine of 292 samples exceeded the Shellfish Harvesting water quality standards, compared to an allowable 48 exceedances. This area is a California Ocean Plan designated ASBS, designated April 18, 1974 (Resolution No. 74-32) and June 19, 1975 (Resolution No. 75-61). This ASBS designation was made prior to the original November 28, 1975 San Diego Basin Plan shellfish beneficial use designation. As an ASBS the collection of shellfish or any other life, is strictly prohibited and enforced. At this time the California Department of Fish and Game (CDFG) is recommending expansion of the protection of the ASBS under the Marine Life Protection Act. The City of San Diego is recommending the removal of this listing because the shellfish beneficial use does not and will not occur in the ASBS, because it was designated an ASBS prior to the original Basin Plan shellfish designation and is therefore under an existing institutional control. 	<ul style="list-style-type: none"> This LOE should not be included in the listing assessment
70	Pacific Ocean Shoreline, Scripps HA, at La Jolla Cove (90630000)	Total Coliform (16842)	29277	<ul style="list-style-type: none"> Nine exceedances out of 2555 compared to Water Contact Recreation. 	<ul style="list-style-type: none"> LOE does not support listing
71	Pacific Ocean Shoreline, Scripps HA, at La Jolla Cove (90630000)	Total Coliform (16842)	29253	<ul style="list-style-type: none"> Assessed data for the Beneficial Use of Water Contact Recreation. Zero exceedances out of 66 Geometric mean calculations 	<ul style="list-style-type: none"> LOE does not support listing
72	Pacific Ocean Shoreline, Scripps HA, at La Jolla Cove (90630000)	Total Coliform (16842)	29246	<ul style="list-style-type: none"> A total of 292 single samples were collected with nine samples correlated with a storm event. Two of the nine samples exceeded the Shellfish Harvesting single sample water quality objective. This information will not be used in determining a listing decision, but is of interest to the Regional Board and has been included here as additional anecdotal information. This area is a California Ocean Plan designated ASBS, designated April 18, 1974 (Resolution No. 74-32) and June 19, 1975 (Resolution No. 75-61). This ASBS designation was made prior to the original November 28, 1975 San Diego Basin Plan shellfish beneficial use designation. As an ASBS the collection of shellfish or any other life, is strictly prohibited and enforced. At this time the California Department of Fish and Game (CDFG) is recommending expansion of the protection of the ASBS under the Marine Life Protection Act. The City of San Diego is recommending the removal of this listing because the shellfish beneficial use does not and will not occur in the ASBS, because it was designated an ASBS prior to the original Basin Plan shellfish designation and is therefore under an existing institutional control. 	<ul style="list-style-type: none"> This LOE was not used to make the listing decision Any comparison to Shellfish Harvesting standards should not be included in listing decisions for this water body

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
73	Pacific Ocean Shoreline, Scripps HA, at La Jolla Cove (90630000)	Total Coliform (16842)	29248	<ul style="list-style-type: none"> A total of 292 single samples were collected with 10 samples correlated with a storm event. One of the 10 samples exceeded the Water Contact Recreation single sample water quality objective. This information will not be used in determining a listing decision, but is of interest to the Regional Board and has been included here as additional anecdotal information. 	<ul style="list-style-type: none"> This LOE was not used to make the listing decision
74	Pacific Ocean Shoreline, Scripps HA, at La Jolla Cove (90630000)	Total Coliform (16842)	29247	<ul style="list-style-type: none"> A total of 292 single samples were collected with one sample exceeding the single sample water quality objective. 	<ul style="list-style-type: none"> LOE does not support listing
Pacific Ocean Shoreline, Scripps HA, at Ravina Total Coliform Decision Recommendation: No comment					
75	Pacific Ocean Shoreline, Scripps HA, at Ravina (90630000)	Total Coliform (16836)	29204	<ul style="list-style-type: none"> 54 out of 313 samples exceeded Shellfish Harvesting standards (~17%), compared to an allowable 51 exceedances. 	<ul style="list-style-type: none"> No comment
76	Pacific Ocean Shoreline, Scripps HA, at Ravina (90630000)	Total Coliform (16836)	29206	<ul style="list-style-type: none"> Four of 313 exceeded Water Contact Recreation standards. 	<ul style="list-style-type: none"> LOE does not support listing
77	Pacific Ocean Shoreline, Scripps HA, at Ravina (90630000)	Total Coliform (16836)	29212	<ul style="list-style-type: none"> One of 76 geometric mean calculations exceeded the Water Contact Recreation standard. 	<ul style="list-style-type: none"> LOE does not support listing
78	Pacific Ocean Shoreline, Scripps HA, at Ravina (90630000)	Total Coliform (16836)	29207	<ul style="list-style-type: none"> A total of 313 single samples were collected with 11 samples correlated with a storm event. One of the 11 samples exceeded the single sample water quality objective. This information will not be used in determining a listing decision, but is of interest to the Regional Board and has been included here as additional anecdotal information. 	<ul style="list-style-type: none"> This LOE was not used in the listing assessment.

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
79	Pacific Ocean Shoreline, Scripps HA, at Ravina (90630000)	Total Coliform (16836)	29272	<ul style="list-style-type: none"> Five of 2555 exceeded Water Contact Recreation standards. 	<ul style="list-style-type: none"> LOE does not support listing
80	Pacific Ocean Shoreline, Scripps HA, at Ravina (90630000)	Total Coliform (16836)	29205	<ul style="list-style-type: none"> A total of 313 single samples were collected with 11 samples correlated with a storm event. Five of the 11 samples exceeded the Shellfish Harvesting single sample water quality objective. This information will not be used in determining a listing decision, but is of interest to the Regional Board and has been included here as additional anecdotal information. 	<ul style="list-style-type: none"> LOE was not used in listing decision
<p>Pacific Ocean Shoreline, Scripps HA at Vallecitos Court at La Jolla Shores Beach Total Coliform Decision Recommendation: The Shellfish beneficial use should not be applied to this waterbody, because it was designated as an ASBS prior to San Diego Basin Plan beneficial use designations, and therefore is subject to an existing institutional control. Comparison of Total Coliform to Water Contact Recreation standards indicates that this water body/pollutant combination is not eligible for 303(d) listing at this time. It is recommended that this waterbody/pollutant combination not be included as a Category 5 decision on the 305(b)/303(d) 2008 Integrated Report.</p>					
81	Pacific Ocean Shoreline, Scripps HA at Vallecitos Court at La Jolla Shores Beach (90630000)	Total Coliform (16921)	29653	<ul style="list-style-type: none"> A total of 33 single samples were collected with six samples exceeding the Shellfish Harvesting single sample water quality objective. This area is a California Ocean Plan designated ASBS, designated April 18, 1974 (Resolution No. 74-32) and June 19, 1975 (Resolution No. 75-61). This ASBS designation was made prior to the original November 28, 1975 San Diego Basin Plan shellfish beneficial use designation. As an ASBS the collection of shellfish or any other life, is strictly prohibited and enforced. At this time the California Department of Fish and Game (CDFG) is recommending expansion of the protection of the ASBS under the Marine Life Protection Act. The City of San Diego is recommending the removal of this listing because the shellfish beneficial use does not and will not occur in the ASBS, because it was designated an ASBS prior to the original Basin Plan shellfish designation and is therefore under an existing institutional control. 	<ul style="list-style-type: none"> This LOE should not be included in the listing assessment Any comparison to Shellfish Harvesting standards should not be included in listing decisions for this water body
82	Pacific Ocean Shoreline, Scripps HA at Vallecitos Court at La Jolla Shores Beach (90630000)	Total Coliform (16921)	29654	<ul style="list-style-type: none"> A total of 33 single samples were collected with no samples exceeding the Water Contact Recreation single sample water quality objective. 	<ul style="list-style-type: none"> LOE does not support listing

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Comment #	Water Body Name (Calwater Number)	Pollutant (Decision ID)	LOE ID	Reason for Proposed Changes/Comments	Comments/Proposed Changes
83	Pacific Ocean Shoreline, Scripps HA at Vallecitos Court at La Jolla Shores Beach (90630000)	Total Coliform (16921)	29655	<ul style="list-style-type: none"> A total of 20 single samples were collected with 19 monthly geometric means calculated. None of the geometric means exceeded the geometric mean Water Contact Recreation water quality objective. 	<ul style="list-style-type: none"> LOE does not support listing
84	Pacific Ocean Shoreline, Scripps HA at Vallecitos Court at La Jolla Shores Beach (90630000)	Total Coliform (16921)	29672	<ul style="list-style-type: none"> One health advisory was issued out of 2555 beach days. 	<ul style="list-style-type: none"> LOE does not support listing

