

January 26, 2006

Selica Potter, Clerk to the Board
Executive Office
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814
Phone: 916-341-5620

**RE: COMMENTS ON THE 2006 SECTION 303(d) LIST UPDATE FOR LISTING OF
LOMA ALTA CREEK FOR TOTAL DISSOLVED SOLIDS**

The 2006 Section 303(d) List Update includes the decision to list Loma Alta Creek (HA 904.10), in the Carlsbad Hydrologic Unit, for Total Dissolved Solids (TDS). According to the *Fact Sheets Supporting Revision of Section 303(d) List, Region 9*, this decision is based on the results of two samples, taken by the Regional Water Quality Control Board (RWQCB) Region 9 on May 20, 1998 that were in exceedance of 500 mg/L for TDS. The fact sheet further states "For inland surface waters with all beneficial uses, the WQO for Total Dissolved Solids is 500 mg/L."

Loma Alta Creek has only limited beneficial uses. According to Table 2-2, Beneficial Uses of Inland Surface Waters, on page 2-26 in the *Water Quality Control Plan for the San Diego Basin* (Basin Plan), Loma Alta Creek has the beneficial uses of R2 – Non-Contact Water Recreation, WA – Warm Freshwater Habitat, and WI – Wildlife Habitat. R1 – Water Contact Recreation is listed as a potential beneficial use. Loma Alta Creek is excerpted from MUN – Municipal and Domestic Supply and is not listed for AGR – Agricultural Supply, IND – Industrial Service Supply, PROC – Industrial Process Supply, GWR – Groundwater Recharge, FRSH – Freshwater Replenishment, POW – Hydropower Generation, BIOL – Preservation of Biological Habitats of Special Significance, COLD – Cold Freshwater Habitat, RARE – Rare, threatened or Endangered Species, or SPWN – Spawning, Reproduction, and/or Early Development.

The Basin Plan discusses Total Dissolved Solids in inland surface waters on page 3-15. The only numerical limit discussed in that section in regard to Total Dissolved Solids in inland surface waters states, "The recommended secondary drinking water standard for total dissolved solids is 500 mg/L with an upper limit of 1,000 mg/L due to taste considerations." Regarding water quality objectives for Total Dissolved Solids, the Basin Plan states "Inland surface waters shall not contain total dissolved solids in concentrations in excess of the numerical objectives described in Table 3-2."

In the section entitled *Water Quality Objectives of Inland Surface Waters*, on page 3-17 in the Basin Plan, it states that "Specific numerical water quality objectives for inland surface waters are presented by hydrologic area and subarea and watershed in Table 3-2...The water quality objectives for inland surface water designations described in this table correspond with the

beneficial used designations previously described in Chapter 2. Water Quality Objective variations occur in some of the hydrologic areas, subareas and stream reaches.”

Loma Alta Creek is listed in Table 3-2 in the Basin Plan under the Carlsbad Hydrologic Unit on page 3-23. In Table 3-2, there is no limit stated for TDS, Chlorides, Sulfates, Sodium, Nitrogen and Phosphorus, Iron, Manganese, MBAS or Boron for Loma Alta Creek.

The decision by the State Board to list Loma Alta Creek for TDS is based on two measured exceedances of 500 mg/L. The fact sheet explaining the decision states that the use of 500 mg/L as a water quality objective is based on beneficial uses and water quality objectives in the Basin Plan. However, Loma Alta Creek does not have a TDS water quality objective listed in the Basin Plan. Further, based on the sections in the Basin Plan regarding beneficial uses of inland surface waters, Table 2-2 listing those uses, water quality objectives of inland surface waters, water quality objectives for total dissolved solids, and Table 3-2 listing those objectives, Loma Alta Creek does not have the beneficial uses to merit a blanket TDS water quality objective of 500 mg/L.

The City of Oceanside does not support the decision by the State Board to list Loma Alta Creek in Section 303(d) for TDS. The City requests that the State Board review this decision and remove Loma Alta Creek from the 2006 Section 303(d) list Update for TDS.

If you have any questions, please contact Hawkeye Sheene, Environmental Specialist for the Clean Water Program at (760) 435-5807.

Sincerely,

Barry Martin, Director
Water Utilities Department

Attachments:

- Fact Sheets Supporting Revision of Section 303(d) List, Region 9, page 109-110
- Basin Plan - Table 2-2. Beneficial Uses of Inland Surface Waters, page 2-26
- Basin Plan - Total Dissolved Solids section for inland surface waters, page 3-15
- Basin Plan - Water Quality Objectives of Inland Surface Waters section, page 3-17
- Basin Plan - Table 3-2. Water Quality Objectives, page 3-23

cc: John Robertus, Regional Water Quality Control Board
Robert Morris, Regional Water Quality Control Board
Craig J. Wilson, Water Quality Assessment Unit, Division of Water Quality, SWRCB (email)