



Taking a gamble

Palm Springs Indian band plans to erect \$80 million second casino. **News, A-3**



She makes a hit

Hilltop's Melissa Ramirez shares love of sports with younger girls. **Sports, D-1**

The San Diego Union-Tribune

City Final

35¢
Tax included

olitician We tried to emphasize that. I'm hoping at's why people supported me."

K MURPHY, SAN DIEGO MAYORAL CANDIDATE



EARNIE GRAFTON / Union-Tribune photos

celebrated the news that Judge Dick Murphy won a spot in the runoff election for the mayor's her Peter Q. Davis by 169 votes, will run against Supervisor Ron Roberts in November.

Murphy is a mayoral finalist

will face Roberts in November

2000

ral race	
	Votes Percent
irts	68,672 25.72
thy	41,874 15.68
Davis	41,705 15.62
Marden	40,512 15.17
tevens	27,822 10.42
ar	24,059 9.01
	8,711 3.26
rdan	5,337 2.00
ld Crane	3,304 1.24
Adkins	1,969 0.74

mere 169 votes. Both finalists contended yesterday that their experience gives them the clear advantage for November.

Murphy touted his credentials as a businessman, lawyer and judge, and his five years of experience on the City Council. Roberts, an architect, cited his land-use expertise and 13 years in local government, six of them on the Board of Supervisors.

"On some issues we may be sounding alike," Roberts said, "but the fact of the matter is, our experiences are quite a bit different."

"I'm not saying his experience is



Sewer line that broke had failed repeatedly

Multimillion-gallon spill was second since 1991

By Terry Rodgers, STAFF WRITER

A San Diego sewer line responsible for a 36 million-gallon raw sewage spill last month has a history of major failures and was identified as a high priority for replacement nine years ago.

Although work to replace the problem sewer was started nearly two years ago, the project hit a snag and was never completed.

The same sewer main — a stretch of pipeline that runs along Alvarado Creek near San Diego State University — was the source of a massive sewage spill in March 1991 that is remarkably similar to the one last month.

After the earlier pipe failure, which caused an estimated 5.1 million gallons of untreated sewage to flow for five days into the San Diego River and ultimately the Pacific Ocean, a city engineer recommended replacing and moving the 1,000-foot-long section of pipe to a location less susceptible to storm erosion.

In his May 1991 memorandum, Water Utilities Department engineer Jafer Kazem noted that the vulnerable section of the line — located on the north side of Interstate 8 near Adobe Creek Falls — had also split apart in 1980 after it was undermined by storm runoff.

See SEWER LINE on Page A-7

NASA strategy is criticized by review panels

Reports find agency pushing too hard to be 'faster, better, cheaper'

By Warren E. Leary, NEW YORK TIMES NEWS SERVICE

WASHINGTON — In the wake of two botched missions to Mars, it may be time for NASA to cool its jets.

The failures suggest that the National Aeronautics and Space Administration is pushing too hard to do more with less money and is jeopardizing success by paying inadequate attention to risks, two review panels said yesterday.

NASA's recent philosophy of conducting a

Sewer line

Memo called replacement a matter of 'high priority'

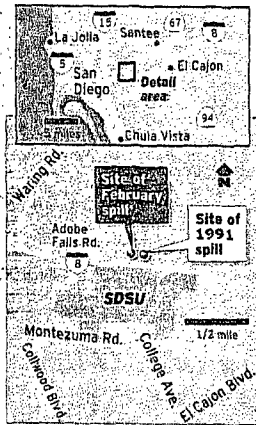
Continued from A-1

"We are attaching high priority to this project and request that it be included in the list of the (annual capital improvement) projects," Kazem's memo stated.

It said the work was necessary "in order to prevent further breaks in the future."

The city of San Diego was fined \$50,000 for the 1991 sewage spill by the state Regional Water Quality Control Board. The city was deemed negligent because city repair crews failed to respond to the spill until two days after it was reported by a hiker who smelled the contaminated water.

The state agency is investigating the city's actions in the recent spill.



PAUL HORN / Union-Tribune

a manhole on the same stretch of sewer was cracked open by a tree that fell during a rainstorm. Untreated sewage spilled into the river and went undetected.

After the spill was discovered Feb. 28, county health officials closed approximately two miles of beaches in Ocean Beach, Mission Beach and Mission Bay. The beach closure lasted four days. A small number of fish and crayfish in the San Diego River were found dead after the spill, and at least two surfers reported becoming sick.

"The city has apparently not learned anything from past experiences," said Donna Frye, who monitors ocean pollution for the Center

for Marine Conservation.

Frye and other local environmentalists urged the Regional Water Quality Control Board to fine the city \$6 million — one dollar for each gallon of untreated sewage that was spilled.

"The city has to be held responsible for not taking care of problems when they know they exist," Frye said. "They could have averted this from happening."

Responding yesterday to Frye's comments, Metro Wastewater director Lave Schlesinger said: "Hindsight is always 20/20. It's unfair to characterize the city's entire record by one spill that occurred in Alvarado Canyon."

Under the law, the regional board can levy a fine of more than \$360 million for the sewage spill. But officials with the agency say it is highly unlikely that the maximum penalty will be imposed.

Money from such fines, which are ultimately borne by sewer ratepayers, typically goes into a state-wide pollution cleanup and abatement account.

Schlesinger told the regional board last week that, as a result of the massive spill, the city now intends to spend as much as \$250,000 to install state-of-the-art equipment which would provide for early detection of sewer breaks.

The early detection system can

be put into place as quickly as the next six months, he said.

The plan would involve installing 98 in-pipe flow meters remote sensing device that trigger an alarm at the city puterized sewer system monitoring center in Kearny Mesa.

A high-technology warning system using fiber optic cable continuously monitors the city's new piped high-pressure sewerage line, which runs for 17.5 miles between Point Loma and Miramar. No major city in the United States has a system for detecting along gravity-flow sewerage lines, Schlesinger said.

San Diego had major pr

which Metropolitan Wastewater officials say is the largest release of untreated sewage in city history. It was undiscovered for seven days.

Metro Wastewater official Charles Yackly said he could not fully explain why the city still has not relocated the Alvarado sewer main, a 21-inch-diameter pipe that is relatively new at 33 years old, but which is located in a hard-to-reach, highly erodible canyon.

"I don't know all the reasons for the delays," said Yackly, who oversees the city's sewage collection system. "I do know that the scope of the project changed a couple of times."

Work to relocate the sewer line to safer terrain — the south side of the freeway — finally began in June 1998 under a \$3.5 million contract. While boring under the freeway, the contractor encountered rock more dense than a soil report had predicted. The contractor's problems were not connected to an 8-foot-deep sinkhole that Caltrans had to fill with concrete in March 1997.

In June 1999, after 75 percent of the sewer replacement project was completed, the city suspended the contract, and work was stopped.

The city is rebidding the project, which, unless it is accelerated, would be finished in one year.

Nine months after work stopped,

Automakers told to teach parents to install seats

ASSOCIATED PRESS

ATLANTA — The chairman of the National Transportation Safety Board criticized six automakers yesterday for failing to establish programs to make sure children are properly secured in car safety seats.

Chairman Jim Hall scolded Volvo, Mitsubishi, Kia, Subaru, Suzuki and Isuzu in a speech at a national highway safety meeting in Atlanta.

"I look away and then back again, hoping you'll be gone. You're not.

How about now? No. Okay, how about now? Still no. Maybe a lengthy

blink will do the trick? Nothing.

I know, I'll cover you with my finger.

Okay, now I'm moving my finger.

Okay, I'm putting my finger back.

You're snickering, aren't you? I can

hear you. Funny stuff, sandman.

Funny stuff."



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A high-technology warning system using fiber optic cable continuously monitors the city's newly completed high-pressure sewage sludge line, which runs for 17.5 miles between Point Loma and Mira Mesa. No major city in the United States has a system for detecting breaks along gravity-flow sewage lines, Schlesinger said.

San Diego had major problems

with its sewage system during the 1980s and early 1990s. They culminated in 1991 with a \$500,000 fine imposed by a federal judge, who also forced the city to implement a \$2.5 million low-flow toilet installation program.

The city's sewage-spill record has been improving steadily since 1995, when 429 spills were reported. Last year, the city recorded 314 sewage spills, a 10 percent increase from the previous year. While the number of spills over the two-year period increased, the volume of untreated sewage that reached recreational waters over the two-year period decreased from 3,096 gallons to 285 gallons.



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Funny stuff.”

ATTACHMENT A:

Prepared by Hiram Sarabia,
San Diego Baykeeper
May 14, 2001

Review of Quantitative Data for the San Diego River

In its 1998 305(b) report the Regional Board indicates that there has been no assessment of the San Diego River. However, after only approximately one month of research we were able to locate several sources of quantitative water quality data going back as far as 1965, sources of data are listed below:

- * Padre Dam Municipal Water District Receiving Water Sampling and Analyses Data
- * City of El Cajon, Storm Water Monitoring Data
- * City of Santee, Storm Water Monitoring Data
- * Groundwater Sampling Data – Santee, El Monte Monitoring Program
- * SDRWQCB 1999 Biological Assessment Annual Report
- * Department of Water Resources – 1965 Ground Water Conditions in the San Diego River Valley Report
- * San Diego BayKeeper Water Quality Monitoring Program Data

After reviewing surface water data for the San Diego River and having conducted testing of our own we have identified several areas of concern. Review of Padre Dam surface water monitoring data going back to 1997 and independent testing indicates that recurrent exceedances in total and fecal coliform are a problem throughout the San Diego River. The Padre Dam monitoring program includes sites as far downstream as the San Diego River Estuary (near I-5). Along the San Diego River typical levels of total coliform range in the thousands, a condition that is in violation of the Clean Water Act considering the beneficial uses assigned to this water body. Preliminary analyses of these data indicate that peaks occur both during wet and dry weather periods, with areas like Forester Creek in El Cajon and Old Mission Dam consistently showing the highest levels (See attached data). We recommend that the Regional Board conduct detail analyses of these microbiological data and that correlations between bacteria levels, surface flow and known sewage events be investigated.

Also, while examining this same dataset and also conducting independent testing we were able to observe recurrent exceedances in TDS, elevated levels of pH and significantly low concentrations of dissolved oxygen. We suggest that the Regional Board examine data for Forester Creek and Mission Ponds, as these show significant problems. In addition, City of Santee dry weather stormwater monitoring reports also indicate the presence of extremely high levels of pH and in some cases elevated levels of ammonia and detergents at sites located south of River Park Place, south of Mast Blvd., near Chubb Lane, Forester Creek, south Bank of San Diego River and east of Fanita Drive. These constituents and contaminants are of crucial importance considering their impact on habitat integrity and the San Diego River's beneficial use as a wildlife and rare

and endangered species habitat. Furthermore, other types of data also indicate that the habitats of the river show clear signs of impairment.

The 1999 biological Assessment Report indicates that in our county benthic communities in riparian habitats are dominated by pollution tolerant species, diversity is low, and sensitive species are rarely encountered, all of which are established biological indicators of impairment. The San Diego River sites in particular rank consistently below average with respect to the rest of the county. Among the San Diego River sites, the River Valley Golf Course is of particular concern as its consistently ranked below other San Diego River sites. Special note should be made in that rankings were based on a comparison between impacted sites, evaluation of these sites in comparison to 'pristine' upstream reference sites will likely reveal a greater degree of impairment.

Another associated area of concern is groundwater contamination, given the direct interaction between the river water and aquifer waters. Examination of groundwater data for Santee has revealed elevated levels of Aluminum, Chromium, and several other organic compounds, including MTBE. In spite of the fact that well water samples were taken from the same aquifer (and taking some natural variability in levels into account) it is unusual that levels at adjacent sampling location within the same aquifer show differences in constituent levels of two orders of magnitude or more. Overview of these data clearly shows that some wells are in proximity to sources contamination. The heavy metals data should be reviewed carefully and evaluated in relation to historical data and known natural background levels. However, in terms of the organic compounds there is no question that these wells have been contaminated. Given that this is an unconfined aquifer the risk of surface water contamination is great and the we urge the regional board to investigate this and locate and abate sources of pollution.

We believe that there is sufficient data available to indicate that the San Diego River is seriously impacted by contamination and that comprehensive analyses of these data will show that impacts are not confined specific portions of the river but that the river as a whole shows significant signs of impairment. We also believe that trend analyses of these data that take into account known events of contamination and NPDES discharge information will be crucial in determining the sources of pollution. Moreover in gathering these data we have identified for greater coordination between the different agencies conducting sampling as a means to reduce overlap, as well as ensure consistent sampling and analyses methodologies and establish a consistent level of data quality and comparability.

**Padre Dam Municipal Wastewater District
 Facility Santee Water Reclamation Plant
 (619)258-4600**

NPDES Permit Required Monitoring

Sample Type: Grab ✓

Sample Frequency: Biweekly/Monthly

Analyzed By: Env. Eng. LAB & D. White

**TOTAL/FECAL
 COLIFORM
 (MPN/100-ml)**

Handwritten: ~~Apr-98~~ Dates?

Site No.	Location	Parameter	Oct-97	Nov-97	Dec-97	Jan-98	Feb-98	Mar-98	Apr-98	Apr-98	May-98	May-98	Jun-98
1	Carlton Hills Blvd. Bridge	Total	800	800	1300	3000	13000	1700	2300	300	2300	2300	700
1	Carlton Hills Blvd. Bridge	Fecal	2	2	2	2	2	2	2	200	2	2	200
2	Forrester Creek	Total	3000	3000	3000	7000	24000	5000	30000	5000	8000	5000	2300
2	Forrester Creek	Fecal	200	200	2	800	1100	1100	24000	200	1700	400	400
3	Sycamore Creek/SD River	Total	5000	500	5000	1300	13000	2200	3000	1300	2300	2300	2300
3	Sycamore Creek/SD River	Fecal	200	200	2	2	800	2	400	2	2	2	2
3a	Mast Blvd. Bridge	Total											
3a	Mast Blvd. Bridge	Fecal											
4	Old Mission Dam	Total	2300	2300	1700	8000	30000	2300	2200	7000	2300	2300	5000
4	Old Mission Dam	Fecal	2	2	2	2	1700	2	700	200	2	200	400
5	Mission Ponds	Total	NF	1700	400	800	3000	2600	3000	5000	2300	2300	3000
5	Mission Ponds	Fecal	NF	800	2	2	200	400	400	2	2	2	2
6	I-5 Estuary	Total	NF	2300	800	1700	13000	2100	3000	5000	1700	2300	3000
6	I-5 Estuary	Fecal	NF	2	2	2	800	200	2	200	2	2	2
6a	Fashion Valley Rd.	Total											
6a	Fashion Valley Rd.	Fecal											

TOTAL

Site No.	Location	Location	Oct-97	Nov-97	Dec-97	Jan-98	Feb-98	Mar-98	Apr-98	Apr-98	May-98	May-98	Jun-98
1	Carlton Hills Blvd. Bridge	Carlton Hills Blvd. Bridge	800	800	1300	3000	13000	1700	2300	300	2300	2300	700
2	Forrester Creek	Forrester Creek	3000	3000	3000	7000	24000	5000	30000	5000	8000	5000	2300

**TOTAL/FECAL
COLIFORM
(MPN/100-ml)**

3 Sycamore Creek/SD River	Sycamore Creek/SD River	5000	500	5000	1300	13000	2200	3000	1300	2300	2300	2300
3a Mast Blvd. Bridge	Mast Blvd. Bridge											
4 Old Mission Dam	Old Mission Dam	2300	2300	1700	8000	30000	2300	2200	7000	2300	2300	5000
5 Mission Ponds	Mission Ponds	NF	1700	400	800	3000	2600	3000	5000	2300	2300	3000
6 I-5 Estuary	I-5 Estuary	NF	2300	800	1700	13000	2100	3000	5000	1700	2300	3000
6a Fashion Valley Rd.	Fashion Valley Rd.											
	MEAN	1387.5	1325.0	1525.0	2725.0	12000.0	1987.5	5437.5	2950.0	2362.5	2062.5	2037.5
	SE	616.7	340.3	603.6	1095.6	3376.4	420.0	3942.6	907.7	844.3	389.7	494.7

FECAL

Site No.	Location	Oct-97	Nov-97	Dec-97	Jan-98	Feb-98	Mar-98	Apr-98	Apr-98	May-98	May-98	Jun-98
1	Carlton Hills Blvd. Bridge	2	2	2	2	2	2	2	200	2	2	200
2	Forrester Creek	200	200	2	800	1100	1100	24000	200	1700	400	400
3	Sycamore Creek/SD River	200	200	2	2	800	2	400	2	2	2	2
3a	Mast Blvd. Bridge											
4	Old Mission Dam	2	2	2	2	1700	2	700	200	2	200	400
5	Mission Ponds	NF	800	2	2	200	400	400	2	2	2	2
6	I-5 Estuary	NF	2	2	2	800	200	2	200	2	2	2
6a	Fashion Valley Rd.											
	MEAN	50.5	150.8	1.5	101.3	575.3	213.3	3188.0	100.5	213.8	76.0	125.8
	SE	40.4	109.3	0.0	115.2	217.4	152.1	3422.0	36.1	245.1	58.8	69.2

Padre Dam Municipal Wastewater District
 Facility Santee Water Reclamation Plant
 (619)258-4600

NPDES Permit Required Monitoring

Sample Type: Grab

Sample Frequency: Biweekly/Monthly

Analyzed By: Env. Eng. LAB & D. White

TOTAL/FECAL
 COLIFORM
 (MPN/100-ml)

PSAMP 2/98

Site No.	Location	Jun-98	Jun-98	Jul-98	Jul-98	Aug-98	Aug-98	Sep-98	Sep-98	Oct-98	Nov-98	Dec-98	Jan-99	Feb-99	Mar-99
1	Carlton Hills Blvd. Bridge	2300	1330	400	2	1700	2300	400	400	800	400	8000	600	1400	1300
1	Carlton Hills Blvd. Bridge	200	2	2	2	2	2	2	2	2	2	3000	2	2	2
2	Forrester Creek	300	1700	3000	1300	1600	1100	30000	2300	3000	30000	30000	3000	17000	50000
2	Forrester Creek	2	2	2	2	1600	2	2200	400	1100	1300	8000	200	2	400
3	Sycamore Creek/SD River	1100	1100	2300	2300	1300	2300	3000	1700	800	3000	5000	110	1300	2700
3	Sycamore Creek/SD River	2	2	800	2	200	2	800	200	2	400	1300	200	2	2
3a	Mast Blvd. Bridge														
3a	Mast Blvd. Bridge														
4	Old Mission Dam	800	3000	500	1700	1300	1300	2300	1600	400	1700	50000	2200	2300	3000
4	Old Mission Dam	2	200	200	200	2	2	200	2	2	2	5000	2	2	2
5	Mission Ponds	1300	2200	2300	1300	3000	400	300	800	300	2100	30000	400	800	800
5	Mission Ponds	2	200	2	2	2	2	200	2	200	400	1400	2	2	2
6	I-5 Estuary	1300	3000	2300	2300	1700	5000	1300	2300						
6	I-5 Estuary	2	200	800	200	700	1700	400	800						
6a	Fashion Valley Rd.									300	5000	17000	2	1100	5000
6a	Fashion Valley Rd.									200	700	1700	2	2	2

TOTAL

Site No.	Location	Jun-98	Jun-98	Jul-98	Jul-98	Aug-98	Aug-98	Sep-98	Sep-98	Oct-98	Nov-98	Dec-98	Jan-99	Feb-99	Mar-99
1	Carlton Hills Blvd. Bridge	2300	1330	400	2	1700	2300	400	400	800	400	8000	600	1400	1300
2	Forrester Creek	300	1700	3000	1300	1600	1100	30000	2300	3000	30000	30000	3000	17000	50000

**TOTAL/FECAL
COLIFORM
(MPN/100-ml)**

3 Sycamore Creek/SD River	1100	1100	2300	2300	1300	2300	3000	1700	800	3000	5000	110	1300	2700
3a Mast Blvd. Bridge														
4 Old Mission Dam	800	3000	500	1700	1300	1300	2300	1600	400	1700	50000	2200	2300	3000
5 Mission Ponds	1300	2200	2300	1300	3000	400	300	800	300	2100	30000	400	800	800
6 I-5 Estuary	1300	3000	2300	2300	1700	5000	1300	2300						
6a Fashion Valley Rd.									300	5000	17000	2	1100	5000
	887.5	1541.3	1350.0	1112.8	1325.0	1550.0	4662.5	1137.5	700.0	5275.0	17500.0	789.0	2987.5	7850.0
	235.0	290.3	382.1	301.8	223.2	570.4	4136.3	275.2	367.2	4014.5	5940.0	439.7	2261.6	6867.2

FECAL

Site No.	Location	Jun-98	Jun-98	Jul-98	Jul-98	Aug-98	Aug-98	Sep-98	Sep-98	Oct-98	Nov-98	Dec-98	Jan-99	Feb-99	Mar-99
1	Carlton Hills Blvd. Bridge	200	2	2	2	2	2	2	2	2	2	3000	2	2	2
2	Forrester Creek	2	2	2	2	1600	2	2200	400	1100	1300	8000	200	2	400
3	Sycamore Creek/SD River	2	2	800	2	200	2	800	200	2	400	1300	200	2	2
3a	Mast Blvd. Bridge														
4	Old Mission Dam	2	200	200	200	2	2	200	2	2	2	5000	2	2	2
5	Mission Ponds	2	200	2	2	2	2	200	2	200	400	4400	2	2	2
6	I-5 Estuary	2	200	800	200	700	1700	400	800						
6a	Fashion Valley Rd.									200	700	4700	2	2	2
		26.3	75.8	225.8	51.0	313.3	213.8	475.3	175.8	188.3	350.5	2550.0	51.0	1.5	51.3
		28.6	38.3	139.3	36.1	226.0	245.1	287.7	113.0	151.0	172.5	937.8	36.1	0.0	57.4

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NPDES Permit Required Monitoring

Sample Type: Grab

Sample Frequency: Biweekly/Monthly

Analyzed By: Env. Eng. LAB & D. White

**TOTAL/FECAL
 COLIFORM
 (MPN/100-ml)**

Site No.	Location	Apr-00	Apr-00
1	Carlton Hills Blvd. Bridge	210	1100
1	Carlton Hills Blvd. Bridge	20	40
2	Forrester Creek	1700	8000
2	Forrester Creek	40	800
3	Sycamore Creek/SD River		
3	Sycamore Creek/SD River		
3a	Mast Blvd. Bridge	500	2200
3a	Mast Blvd. Bridge	20	220
4	Old Mission Dam	700	300
4	Old Mission Dam	20	200
5	Mission Ponds	500	300
5	Mission Ponds	40	40
6	I-5 Estuary		
6	I-5 Estuary		
6a	Fashion Valley Rd.	300	1300
6a	Fashion Valley Rd.	20	130

TOTAL

Site No.	Location	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	Jan-00	Feb-00	Mar-00	Apr-00	Apr-00
1	Carlton Hills Blvd. Bridge	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	210	1100
2	Forrester Creek	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1700	8000

**TOTAL/FECAL
COLIFORM
(MPN/100-ml)**

3 Sycamore Creek/SD River

3a Mast Blvd. Bridge	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	500	2200
4 Old Mission Dam	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	700	300
5 Mission Ponds	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	500	300
6 I-5 Estuary															
6a Fashion Valley Rd.	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	300	1300
	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	488.8	1650.0
	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	191.4	1035.4

FECAL

Site No.	Location	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	Jan-00	Feb-00	Mar-00	Apr-00	Apr-00
1	Carlton Hills Blvd. Bridge	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	40
2	Forrester Creek	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	40	800
3	Sycamore Creek/SD River														
3a	Mast Blvd. Bridge	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	220
4	Old Mission Dam	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	200
5	Mission Ponds	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	40	40
6	I-5 Estuary														
6a	Fashion Valley Rd.	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	130
		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	20.0	178.8
		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.7	101.0

**Padre Dam Municipal Wastewater District
 Facility Santee Water Reclamation Plant
 (619)258-4600**

NPDES Permit Required Monitoring

Sample Type: Grab

Sample Frequency: Biweekly/Monthly

Analyzed By: Env. Eng. LAB & D. White

**TOTAL/FECAL
 COLIFORM
 (MPN/100-ml)**

Site No.	Location	May-00	May-00	May-00	Jun-00	Jun-00	Jul-00	Jul-00	Aug-00	Aug-00	Sep-00	Sep-00
1	Carlton Hills Blvd. Bridge	900	3000	2200	700	300	300	1300	800	500	230	1300
1	Carlton Hills Blvd. Bridge	20	40	20	20	20	2	2	20	20	20	20
2	Forrester Creek	1700	1300	2200	2200	800	5000	1700	1700	9000	5000	1700
2	Forrester Creek	70	40	✓500	230	300	130	130	110	80	✓3000	✓500
3	Sycamore Creek/SD River											
3	Sycamore Creek/SD River											
3a	Mast Blvd. Bridge	1100	3000	9000	1100	9000	2400	2200	1400	9000	9000	5000
3a	Mast Blvd. Bridge	230	40	20	300	5000	40	40	70	130	800	500
4	Old Mission Dam	1300	1600	9000	300	2400	3000	1400	600	230	800	1400
4	Old Mission Dam	20	20	20	20	20	20	20	40	20	20	40
5	Mission Ponds	700	500	500	1700	800	2200	2400	1100	1100	300	500
5	Mission Ponds	20	40	20	20	70	20	40	110	40	130	40
6	I-5 Estuary											
6	I-5 Estuary											
6a	Fashion Valley Rd.	2200	1400	1700	16000	9000	2400	500	2400	1400	1700	1700
6a	Fashion Valley Rd.	130	700	500	5000	1400	800	170	800	500	1100	1300

TOTAL

Site No.	Location	May-00	May-00	May-00	Jun-00	Jun-00	Jul-00	Jul-00	Aug-00	Aug-00	Sep-00	Sep-00
1	Carlton Hills Blvd. Bridge	900	3000	2200	700	300	300	1300	800	500	230	1300
2	Forrester Creek	1700	1300	2200	2200	800	5000	1700	1700	9000	5000	1700

**TOTAL/FECAL
COLIFORM
(MPN/100-ml)**

3 Sycamore Creek/SD River												
3a Mast Blvd. Bridge	1100	3000	9000	1100	9000	2400	2200	1400	9000	9000	5000	
4 Old Mission Dam	1300	1600	9000	300	2400	3000	1400	600	230	800	1400	
5 Mission Ponds	700	500	500	1700	800	2200	2400	1100	1100	300	500	
6 I-5 Estuary												
6a Fashion Valley Rd.	2200	1400	1700	16000	9000	2400	500	2400	1400	1700	1700	
	987.5	1350.0	3075.0	2750.0	2787.5	1912.5	1187.5	1000.0	2653.8	2128.8	1450.0	
	195.5	354.3	1359.8	2149.7	1468.4	534.7	242.3	232.0	1502.9	1238.3	553.5	

FECAL

Site No.	Location	May-00	May-00	May-00	Jun-00	Jun-00	Jul-00	Jul-00	Aug-00	Aug-00	Sep-00	Sep-00
1	Carlton Hills Blvd. Bridge	20	40	20	20	20	2	2	20	20	20	20
2	Forrester Creek	70	40	✓500	230	300	130	130	110	80	✓3000	500
3	Sycamore Creek/SD River											
3a	Mast Blvd. Bridge	230	40	20	300	✓5000	40	40	70	130	✓800	✓500
4	Old Mission Dam	20	20	20	20	20	20	20	40	20	20	40
5	Mission Ponds	20	40	20	20	70	20	40	110	40	130	40
6	I-5 Estuary											
6a	Fashion Valley Rd.	<i>weekly</i> 130	✓700	✓500	✓5000	✓1400	✓800	170	✓800	✓500	✓1100	✓1300
		61.3	110.0	135.0	698.8	851.3	126.5	50.3	143.8	98.8	633.8	300.0
		30.0	95.9	87.6	706.0	695.1	110.5	23.7	106.1	65.5	405.7	175.6

ATTACHMENT A:

Prepared by Hiram Sarabia,
San Diego Baykeeper
May 14, 2001

Review of Quantitative Data for the San Diego River

In its 1998 305(b) report the Regional Board indicates that there has been no assessment of the San Diego River. However, after only approximately one month of research we were able to locate several sources of quantitative water quality data going back as far as 1965, sources of data are listed below:

- * Padre Dam Municipal Water District Receiving Water Sampling and Analyses Data
- * City of El Cajon, Storm Water Monitoring Data
- * City of Santee, Storm Water Monitoring Data
- * Groundwater Sampling Data – Santee, El Monte Monitoring Program
- * SDRWQCB 1999 Biological Assessment Annual Report
- * Department of Water Resources – 1965 Ground Water Conditions in the San Diego River Valley Report
- * San Diego BayKeeper Water Quality Monitoring Program Data

After reviewing surface water data for the San Diego River and having conducted testing of our own we have identified several areas of concern. Review of Padre Dam surface water monitoring data going back to 1997 and independent testing indicates that recurrent exceedances in total and fecal coliform are a problem throughout the San Diego River. The Padre Dam monitoring program includes sites as far downstream as the San Diego River Estuary (near I-5). Along the San Diego River typical levels of total coliform range in the thousands, a condition that is in violation of the Clean Water Act considering the beneficial uses assigned to this water body. Preliminary analyses of these data indicate that peaks occur both during wet and dry weather periods, with areas like Forester Creek in El Cajon and Old Mission Dam consistently showing the highest levels (See attached data). We recommend that the Regional Board conduct detail analyses of these microbiological data and that correlations between bacteria levels, surface flow and known sewage events be investigated.

Also, while examining this same dataset and also conducting independent testing we were able to observe recurrent exceedances in TDS, elevated levels of pH and significantly low concentrations of dissolved oxygen. We suggest that the Regional Board examine data for Forester Creek and Mission Ponds, as these show significant problems. In addition, City of Santee dry weather stormwater monitoring reports also indicate the presence of extremely high levels of pH and in some cases elevated levels of ammonia and detergents at sites located south of River Park Place, south of Mast Blvd., near Chubb Lane, Forester Creek, south Bank of San Diego River and east of Fanita Drive. These constituents and contaminants are of crucial importance considering their impact on habitat integrity and the San Diego River's beneficial use as a wildlife and rare

and endangered species habitat. Furthermore, other types of data also indicate that the habitats of the river show clear signs of impairment.

The 1999 biological Assessment Report indicates that in our county benthic communities in riparian habitats are dominated by pollution tolerant species, diversity is low, and sensitive species are rarely encountered, all of which are established biological indicators of impairment. The San Diego River sites in particular rank consistently below average with respect to the rest of the county. Among the San Diego River sites, the River Valley Golf Course is of particular concern as its consistently ranked below other San Diego River sites. Special note should be made in that rankings were based on a comparison between impacted sites, evaluation of these sites in comparison to 'pristine' upstream reference sites will likely reveal a greater degree of impairment.

Another associated area of concern is groundwater contamination, given the direct interaction between the river water and aquifer waters. Examination of groundwater data for Santee has revealed elevated levels of Aluminum, Chromium, and several other organic compounds, including MTBE. In spite of the fact that well water samples were taken from the same aquifer (and taking some natural variability in levels into account) it is unusual that levels at adjacent sampling location within the same aquifer show differences in constituent levels of two orders of magnitude or more. Overview of these data clearly shows that some wells are in proximity to sources contamination. The heavy metals data should be reviewed carefully and evaluated in relation to historical data and known natural background levels. However, in terms of the organic compounds there is no question that these wells have been contaminated. Given that this is an unconfined aquifer the risk of surface water contamination is great and we urge the regional board to investigate this and locate and abate sources of pollution.

We believe that there is sufficient data available to indicate that the San Diego River is seriously impacted by contamination and that comprehensive analyses of these data will show that impacts are not confined specific portions of the river but that the river as a whole shows significant signs of impairment. We also believe that trend analyses of these data that take into account known events of contamination and NPDES discharge information will be crucial in determining the sources of pollution. Moreover in gathering these data we have identified for greater coordination between the different agencies conducting sampling as a means to reduce overlap, as well as ensure consistent sampling and analyses methodologies and establish a consistent level of data quality and comparability.

From: <hsarabia@acUSD.edu>
To: Keri Cole <colek@rb9.swrcb.ca.gov>
Date: 5/15/01 6:33PM
Subject: Re: Tecolote Creek

Hi Keri,

I hope all is well.

I apologize for the delay in responding, I have been swamped with work. I did talk briefly with Dr. Boudrias about his Tecolote Creek Data and the 303 (d) listing. I don't think he got a chance to review his data, unfortunately the deadlines for the submitting data and finals coincided. I am meeting with Dr. Ron Kaufmann tomorrow and will be talking to Dr. Boudrias soon, I can let them know that you might be interested in talking to them about what they know about Tecolote creek. I believe Dr. Boudrias has data on nutrients. Nutrients are likely very high, because of the Golf Course near the mouth of the canyon and runoff from USD. I would look for herbicides and pesticides too unfortunately those kinds of things are either outside of the scope or budget of monitoring projects.

Also, Keri, Dr. Susan Michaels just delivered a package with information on the San Diego River. As you now know we decided to focus our efforts on that. I am attaching the part of the document that I prepared as I had some problems (that I noted in writing) generating a graph for total coliform. These will be better to read than the ones in the report as these are in color, thanks.

Please let me know if I can help you still with Tecolote and if you have any questions regarding these documents, thank you.

Hiram

Quoting Keri Cole <colek@rb9.swrcb.ca.gov>:

> Good morning Hiram
> I hope you don't mind, but I got your email address from the USD
> website. I was wondering if you had had an opportunity to discuss the
> 303d list and specifically Tecolote Creek with Dr. Boudrais, as yet? I
> never received a response from him or Dr. Kaufman to my email re: an
> recent information/data for the creek. It is already listed for metals
> (Cd, Cu, Pb, Zn), toxicity, coliform, but wasn't sure if there was
> anything else we should be concerned with and/or there is info which
> indicates a larger extent of impairment.
>
> Thanks for your help.
> -Keri
>
>
> Keri Cole, P.E.
> Water Resource Control Engineer
> San Diego RWQCB
> 9771 Clairemont Mesa Blvd., Suite A
> San Diego, CA 92124

San Diego Bay Keeper
 2924 Emerson Street, Suite 220
 San Diego, CA 92106
 (619)758-7743 FAX (619)758-7740
<http://www.sdbaykeeper.org>

Fax

To: Keri Cole From: Suzanne M. & Hiram S.
 Fax: 858-571-6972 Date: _____
 Phone: _____ Pages: 13 (including cover)
 Re: _____ CC: _____

- Urgent
 For Review
 Please Comment
 Please Reply
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*Comments

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May 15, 2001

Chairman John Minan and Boardmembers
Regional Water Quality Control Board, San Diego Region
9771 Clairemont Mesa Blvd., Suite A
San Diego, CA 92124

Re: CWA Section 303(d) Listing

Dear Chairman Minan and Boardmembers:

San Diego BayKeeper, a community-based 501(c)(3) non-profit organization dedicated to protecting and restoring the region's bays, coastal waters and watersheds, submits these comments on the 2002 Clean Water Act (CWA) section 303(d) listing. San Diego BayKeeper has serious concerns with the adequacy of the current 303(d) list for the region, and we are equally concerned about the direction staff may be taking in compiling the April 2002 listing.

First, we remain concerned that Region 9's proposed 303(d) list is not based on a comprehensive assembly and review of information and data on water quality and other impairments regarding all water bodies in Region 9, as the Clean Water Act and its implementing regulations require. *See, e.g., 40 C.F.R. Section 130.7.* Indeed, wholly apart from the Section 303(d) scheme, under Clean Water Act Section 305(b) and accompanying regulations, each regional board must conduct a regional water quality assessment (WQA) of all water bodies in its region. It is clear from an even cursory review of the most recent 1998 California Water Quality Assessment Report, prepared in August 1999 by the Division of Water Quality, State Water Resources Control Board, that such a comprehensive review has yet to be performed in the San Diego region. After a brief review of data in the 1998 WQA, BayKeeper has concluded that, more than twenty years after these requirements were established, at least 80% of San Diego's waters have not yet been fully assessed. Moreover, much of the data that has been gathered may not be easily accessed or understandable. In other words, this data is never fully reviewed or analyzed.

BayKeeper is also concerned about the requirements placed upon organizations wishing to submit information to support the upcoming 2002 CWA section 303(d) listing. The 305(b) and 303(d) lists are essential steps in first understanding and then addressing the overall health of our waters. Not only will the development of comprehensive and accurate 303(d) and 305(b) reports ensure that waters receive the appropriate level of protection through development of Total Maximum Daily Loads or antidegradation policies, but accurate lists will help ensure resources will be allocated wisely. Proper listings will also allow the region to tap into state and federal dollars earmarked for protecting impaired waters (e.g. SWRCB's 319(h) program or Proposition 13). Despite the importance of the 303(d) list, though, those local residents most knowledgeable about their local waters and most impacted by pollution will have a difficult time complying with the submittal requirements established by this Board even though they may have vital and reliable data. Some of our specific concerns relate to:

Timeframe - Region 9, like other regions, is requiring all information to be submitted by May 15, 2001, a full 11 months prior to the final 2002 303(d) listing. We believe this deadline is not only arbitrary, but also extremely difficult to comply with due to the amount of information being requested in a short timeframe. The San Diego Regional Board did not issue their solicitation for information until March 2001, and a formal workshop to discuss the Board's submission requirements was not held until April 4, 2001. This has left interested parties with a scant six weeks to gather and process information. Considering the more than twenty years the regional board has had to develop sufficient 303(d) and ?

305(b) reports (which we are still waiting for), less than six weeks to provide needed data is wholly insufficient. BayKeeper intends to continue providing information to regional board staff through the two remaining public comment periods – August 2001 (when RWQCBs solicit input on draft 303(d) list recommendations) and Winter/Spring 2002 (when the SWRCB conducts formal public hearings on the draft 303(d) list). It is our expectation that the data provided in this timeframe will be reviewed and assessed by regional and state board staff for the 2002 listing.

Required Documentation – The regional board has indicated they will consider information and data generated since July 1997 that is provided both in hard copy as well as electronic formats, and that includes ‘bibliographic citations; identification of software used; model outputs with calibration and quality assurance information and description and interpretation of information provided.’ In separate meetings with regional board staff, BayKeeper has been told that data that can demonstrate trend analysis, that has been replicated and that covers physical, chemical and biological parameters will be most useful in helping to establish an accurate 303(d) list.

BayKeeper appreciates that the more comprehensive the data we are able to provide, the better. We are nonetheless concerned that these requirements are far beyond the criteria of ‘reliability’ which we believe is appropriate. In fact, it is our assertion that the Regional Board must use *all* relevant, reasonably available data (e.g. water quality, sediment, fish tissue, photos, narrative standards, land use plans, videotapes media coverage) to list waters. Listing should occur if evidence under reasonably foreseeable conditions indicates that a standard (e.g., California Toxics Rule, National Toxics Rule, Basin Plans, beneficial uses) is, or will be, violated. Where judgment calls are required, BayKeeper believes the Regional Board must err on the side of environmental and human health protection.

We assert such an interpretation is embodied in the requirement that “Each State shall identify those waters within its boundaries for which the effluent limitations... are not stringent enough to implement *any* water quality standard applicable to such waters.” (CWA, section 303(d)(1)(A), *emphasis added*) Furthermore, the Clean Water Act and its implementing regulations also distinguish between those existing uses that are actually being attained and designated beneficial uses that *must still be protected* whether or not they are currently being attained.

Yet, the submittal requirements of the regional board require a rigor that is both unrealistic and unnecessary for listing. First, it is extremely costly to undertake much of the scientific analysis being requested by the Board, particularly if multiple replicates are being requested, as is trend analysis. It is unreasonable to expect small, grassroots organizations or concerned citizens to incur these types of expenses. In fact, to undertake some of the water quality analysis being requested by the regional board is costing BayKeeper thousands of dollars, and these costs would be substantially higher if we rushed our orders to meet the May 15 deadline. With limited resources, we decided not to rush these orders, meaning certified lab testing of metals, pesticides and herbicides along the San Diego River will be submitted after May 15, but as soon as is practicable.

It is also often impossible for local residents to gain access to some heavily polluted waters to conduct the types of analysis being requested, particularly as these residents often fear reprisals from local businesses that may be impacted by a demonstration that they are polluting these waters. This is a real and serious problem BayKeeper has faced in trying to gather data for this listing from local residents, particularly along certain areas of the San Diego River.

BayKeeper is also uncertain about the requirement that data be generated since July 1997. Again, we understand the need for reliable data, and more current data would be preferable. We also recognize that it is not necessary to provide pre-1997 data that has already led to a listing in 1998 or before (other than possibly using data to ensure that inappropriate delisting does not occur). However, we believe that valid

pre-1997 data (particularly that data that the Board already possess) that demonstrates impairment, but which has not yet led to a listing, must be considered by this Board. In fact, as is discussed in greater detail below, the 1998 WQA report includes listings of several water bodies that show some level of impairment but which have not yet been listed. Listing those waters for which information already exists must be the first step in the 2002 listing.

Finally, while BayKeeper – through its ever-expanding Citizen Water Quality Monitoring taskforce – looks forward to working closely with regional board staff to undertake a more comprehensive assessment of local waters, the ultimate burden of listing lies with your agency. Because of the importance of the 2002 list in terms of water quality protections as well as access to resources to help restore waters, we will do everything within our power to point regional board staff in the direction of identifying impaired waters. However, we believe it is the duty of this Board – a duty that has not yet been met – to prepare complete and accurate 305(b) and 303(d) lists. The following information on waters we believe should be listed will need follow-up from regional board staff, and in no way is meant to represent a comprehensive listing of all of San Diego's waters which may be impaired.

303(d) List

BayKeeper believes the first step in preparing an accurate 2002 303(d) list is necessarily to review the most recent 1998 Water Quality Assessment. In that report, a matrix is provided which lists each separate hydrological unit in San Diego, and indicates whether each unit has or has not been assessed. For those that have been assessed, the matrix indicates whether these waters are supporting designated beneficial uses fully, partially, not at all, or whether beneficial uses are threatened. For the reasoning highlighted above, BayKeeper believes it is incumbent on the regional board to err on the side of environmental and human health protection, meaning that listing should occur for every assessed water body that is not meeting designated beneficial uses. This is not the case with the 1998 WQA report, and some examples follow:

Dana Point Harbor (Hydrological Unit 901.140) – listed as 215 acres fully supporting designated beneficial uses. Yet, the assessment comments column indicates that Dana Point Harbor and Baby Beach were closed from 8/96 to 7/97 to water contact recreation. As Dana Point Harbor is listed as meeting Recreation 1 and 2 standards, it should be listed as impaired if it was indeed closed for nearly a year to water contact.

San Diego Bay (Hydrological Unit 900.00) – While 222 acres of San Diego bay are listed as impaired due to benthic community effects, sediment toxicity and copper, 11772 acres are threatened, but not listed as impaired. The WQA assessment indicates that the entire bay (12000 acres) is posted with warnings for pregnant women and young children against consumption of fish due to elevated levels of PCB's, mercury and PAH's. By the Regional Board's own findings and by definition, BayKeeper believes the entire Bay should be listed as impaired.

Escondido Creek - (Hydrological Unit 904.600) – 23 miles of Escondido Creek are considered 'threatened' due to excessive sediment and nutrients, and should thus be listed as impaired.

Forester Creek - (Hydrological Unit 907.130) – 1 mile of Forester Creek is considered 'threatened' due to elevated fish tissue levels, and should thus be listed as impaired.

Otay River - (Hydrological Unit 910.200) – 5 miles of the Otay River are listed as only partially supporting designated beneficial uses, and should thus be listed as impaired.

Salt Creek (Hydrological Unit 901.140) – Salt Creek was closed regularly in 1996 and 1997 due to elevated coliform levels from sewage spills, and should thus be listed as impaired.

San Diego River, Lower - (Hydrological Unit 907.110) - 6 miles of the Lower San Diego River is considered 'threatened' due to elevated coliform levels and exotic plant species, and should thus be listed as impaired. (Discussed in greater detail below.)

San Juan Creek, Upper Middle - (Hydrological Unit 901.260) - 3.2 miles of the Upper Middle San Juan Creek is considered 'threatened' due to elevated coliform levels, and should thus be listed as impaired.

San Luis Rey River, Lower - (Hydrological Units 903.100) - 18.7 miles of the Lower San Luis Rey River is considered 'threatened' due to elevated coliform levels and exotic plant species, and should thus be listed as impaired.

San Diego River

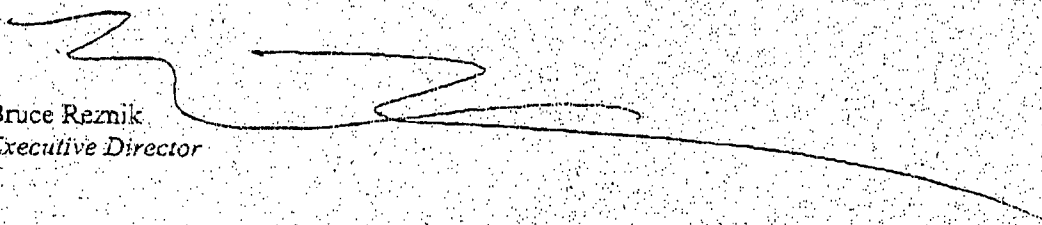
BayKeeper is submitting a separate letter and supporting materials detailing portions of the San Diego River for which sufficient information exists to require a 303(d) listing.

Otay/Sweetwater Rivers

BayKeeper is aware of several comment letters and photographs submitted by Ray Ymzon, Board Member of the Sweetwater Valley Civic Association to the San Diego Regional Water Quality Control relating to 401 certification for the proposed SR-125 toll road. These letters and photos demonstrate increasing trash, and apparent oil and grease problems, at a minimum, along stretches of the rivers, particularly the Sweetwater. We believe further investigation and likely listing is warranted based on the information provided. BayKeeper has not provided copies of these materials, as they should already be in your files.

On behalf of San Diego BayKeeper, I appreciate the opportunity to provide comments on the 2002 CWA section 303(d) listing, and hope they are helpful. A great deal of work is needed to ensure a complete and accurate listing in 2002 and beyond, and BayKeeper looks forward to working with the regional board to ensure such listings. Please do not hesitate to contact me should you have any questions need additional information.

Sincerely,


Bruce Reznik
Executive Director

Attachment B

Prepared by Suzanne M. Michel, Ph.D. Water Resources Geography

Qualitative Data Submitted

- Bizarri, Tiza. 2000. MTBE and the Future of Clean Water in Lakeside, California. Senior Thesis. Department of Political Science. San Diego State University. May. Chapter 2, pages 5-9.
- California State of, Regional Water Quality Control Board, Region 9. 1007. Adoption of Order No. 97-63 "Waste Discharge Requirements for the U.S. Navy, Project P-338S, Pier 3, Dredging San Diego County" File: 05-0843.02
- Cohen, Moses. Engelhardt, Casey and Shawn Neville. Pollution in the San Diego River. Power Point Presentation. Presentation contains photos of potentially contaminating activities in the San Diego River Valley near Mission Ponds and Admiral Baker Field.
- Collingsworth, Van K. 2001. San Diego River Photographic Tour of a Polluted Watershed -- Santee Segment. Computer file e-mailed to RWQCB May 10, 2001.
- El Cajon, City of. Notice of release of Toxic Substances in Forrester Creek. Letter dated July 6, 2000 and San Diego County Notice dated May, 5 2001.
- San Diego, County of. 2001. San Diego River Watershed Management Plan.
- Rodgers, Terry. 2000. Sewer Line that Broke Had Failed Repeatedly. *San Diego Union Tribune*. March 14.
- York, Diane. Folder entitled: Lakeside a River Runs Through It. Media clippings and photos of conditions in the San Diego River, Lakeside CA.
- York, Diane. Videotape. Media Coverage of Lakeside Land Investigation, Bill Signs Trucking Permit Violation Observations, USDRIP Hearing, San Diego County Board of Supervisors, August 2000.

Analysis of Qualitative Data

Residents of East County have for years been aware of actions which degrade water quality and riparian habitat in the San Diego River. These actions have been both condoned by local governments, or have been conducted illegally, often at nighttime. Since water quality testing requires training and a substantial capital investment, local volunteers are submitting to the regional board qualitative data. Data has been obtained through document analysis of government and media documents, observations of illegal polluting activities in the river, interviews of informants or simply observing visual conditions of water quality impairment. In addition, the San Diego River Watershed Management Plan is submitted that describes the significant water quality problems present in the River Basin (see sections entitled Problems Being Addressed, Problem Statement, and Specific Water Quality Goals).

The Board should note that certain regions of the San Diego River are inaccessible due to actions of private property owners. In Lakeside for example much of the river is fenced off with signs saying "No Trespassing." Given this fact of inaccessibility any water quality testing would be impossible. Hence, the only data we were able to obtain was via videotaping or photographs on hills surrounding the River.

These observations demonstrate that even though the County and the Regional Board permit industrial activities, these activities continue to deposit pollutants into the River.

In one instance residents filmed truck washing in Lakeside. This violation of the storm water permit was reported to a Regional Board representative, and the Regional Board representative informed the permittee violator (Bill Sign's Trucking). Subsequently, a Bill Sign's Trucking representative threatened the two men who had conducted the videotaping verbally. This incident and other threatening activities by landowners in Lakeside has instilled an atmosphere of fear. It was very difficult to obtain information, since residents have been threatened and did not want their identities revealed. The Regional Board should investigate the incident concerning Bill Sign's Trucking (June 10, 2000), and establish protocol that if information is submitted one's identity is protected.

Besides videotapes, film data and document analysis, personal testimonies are submitted. The personal testimonies were recorded during the public hearing concerning water quality issues for the Upper San Diego River Improvement Project or USDRIP in Lakeside. This hearing was conducted by the San Diego County Board of Supervisors and indicates ethnographic data concerning degrading water and riparian habitat quality in the San Diego River. This hearing along with other media documents submitted in the "Lakeside a River Runs through It" folder indicates the very high level of concern Lakeside residents have at the status and future of the San Diego River and the Santee-El Monte groundwater basin beneath the River.

Below is an overview of qualitative data submitted indicating hotspots. In these hotspots the Regional Board should review their data and other data submitted. At these sites water quality does not support the following beneficial uses: contact water recreation, warm freshwater habitat, cold freshwater habitat, wildlife habitat and rare or endangered species. In addition, since the Santee-El Monte Groundwater Basin (an unconfined groundwater basin beneath the San Diego River in East County), supports municipal drinking water sources and has been contaminated by above ground land uses, the Board should pay special attention to surface water conditions above the groundwater basin. In ALL areas, the Regional Board should set up monitoring sites

X Lakeside: The entire length of the San Diego River, especially areas within the Upper San Diego River Improvement District (USDRIP), areas zoned M52, M54 and M58 (to the base of San Vincente Dam) and Los Coches Creek. A portion of Lakeside's San Diego riverbed is owned by Lakeside Land, a company that is currently under investigation for illegal dumping of contaminants in the River and destruction of riparian habitat. In the enclosed videotape and notebook (Lakeside a River Runs Through It) we have compiled media coverage of California's Fish and Games raid upon the site.

From document analysis and personal observation, residents (who desire to keep their identities unknown) revealed to us that sediment from Pier 3, Naval Station is being disposed of in the San Diego River by Lakeside Land. This disposal of San Diego Bay sediment is disturbing to Lakeside residents for many reasons. First, as indicated in the enclosed report (Cover Letter dated December 30, 1997) the material in the top layer of sediment "has a significant bioassay toxicity and is

not suitable either for use as beach replenishment material or for ocean discharge." Why is it suitable for disposal into the San Diego Riverbed, which supports recreational and aquatic habitat uses? The document also stipulates that sediment disposed of will be disposed of in a hydrologic basin, which is not designated as MUN. Surface water in the San Diego River is not designated, however groundwater directly beneath the disposal site is designated MUN. What assurances do Lakeside residents have that toxic substances in the sediment are not released into their drinking water supply, and do not affect the above listed beneficial uses? Finally, Lakeside Land Company is disposing the sediment, the very same company currently under **investigation for illegal dumping of pollutants in the San Diego River**. At the very least, RWQCB should release data of water monitoring at the site, conduct soil tests, and hold a public hearing to inform Lakeside residents. Lakeside residents will continue an investigation into this manner, by reviewing RWQCB and County of San Diego Department of Public Health documents.

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Also, while examining the same dataset and conducting independent testing we were able to observe recurrent exceedances in TDS, elevated levels of pH and significantly low concentrations of dissolved oxygen. The later is particularly true for areas like Forester Creek and Mission Ponds. Also City of Santee dry weather stormwater monitoring reports indicate the presence of extremely high levels of pH and in some cases elevated levels of ammonia and detergents at sites located south of River Park Place, south of Mast Blvd., near Chubb Lane, Forester Creek, south Bank of San Diego River, east of Fanita Drive. These constituents and contaminants are of crucial importance considering their impact on habitat integrity and the San Diego River's beneficial use as a wildlife and rare and endangered species habitat. Furthermore, other types of data also indicate that the habitats of the river show clear signs of impairment.

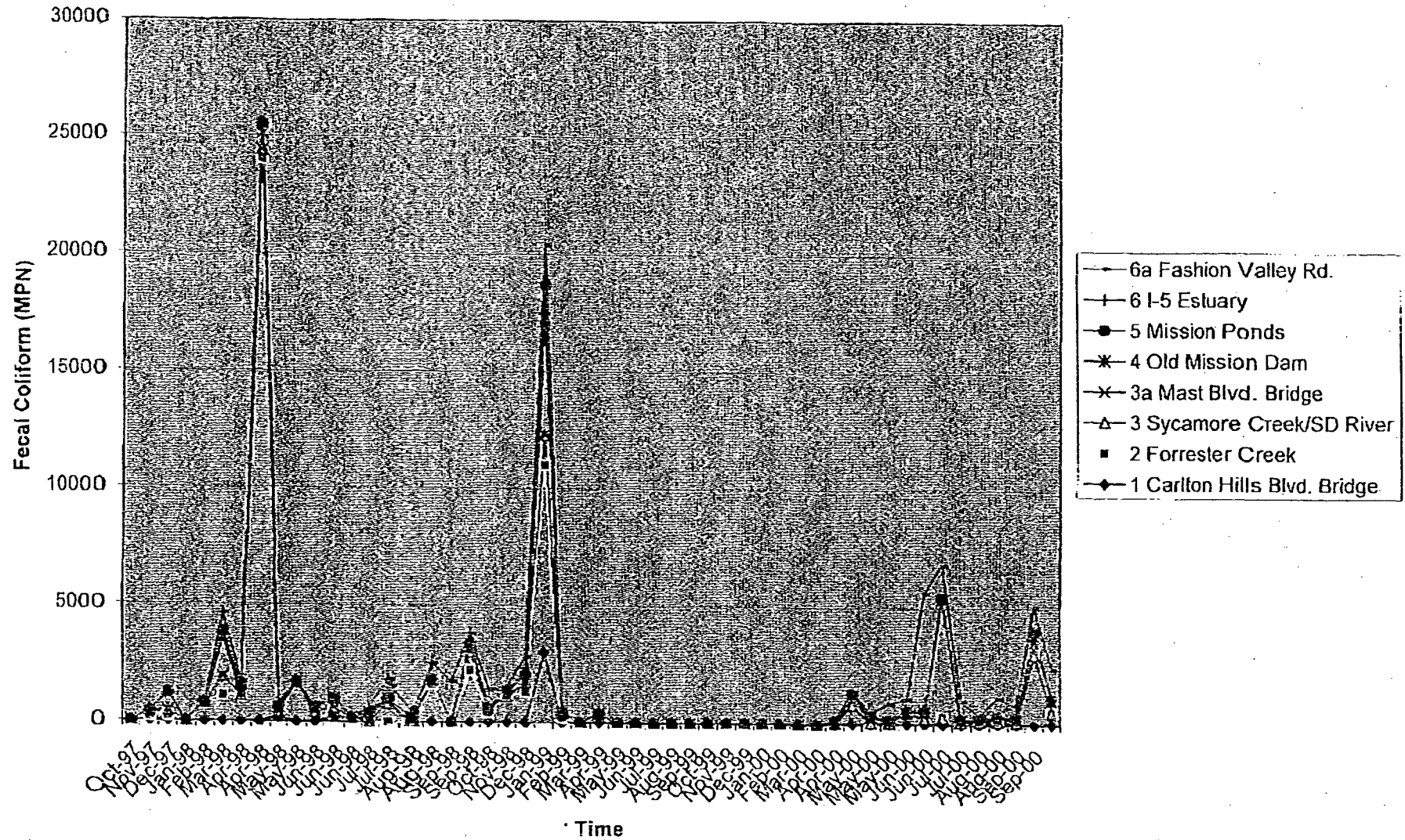
The 1999 biological Assessment Report indicates that in our county benthic communities in riparian habitats are dominated by pollution tolerant species, diversity is low, and sensitive species are rarely encountered, all of which are established indicators of impairment. The San Diego River sites in particular rank consistently below average with respect to the rest of the county. Among the San Diego River sites, the River Valley Golf Course is of particular concern. Considering that rankings were based on a

comparison between impacted sites, evaluation of these sites in comparison to better upstream reference sites will likely reveal a greater degree of impairment.

Another area of concern is groundwater contamination, given the interaction between the aquifers and the river contamination of groundwater is of serious concern. Groundwater testing data also shows elevated levels of Aluminum, Chromium, and several other organic compounds, including MTBE. These well water samples were taken from the same aquifer and even though some variability in levels is to be expected differences in levels in some cases are of two orders of magnitude or greater. Overview of these data clearly shows that some wells are in proximity to sources contamination. The heavy metals data should be reviewed carefully and evaluated in relation to historical data and known natural background. In terms of the organic compounds there is no question that these wells have been contaminated and given that this is an unconfined aquifer the risk of surface water contamination is great.

We believe that there is sufficient data available to indicate that the San Diego River is seriously impacted by contamination and that comprehensive analyses of these data will show that the impact is not confined to certain portions of the river but that the river as a whole shows significant signs of impairment. We also believe that trend analyses of these data that takes into account known events of contamination and NPDES discharge information will be crucial in determining the sources of pollution. Moreover we see that there is a need for greater coordination between the different agencies conducting sampling, as well a need for review of current methodologies to determine levels of quality, comparability of data and standardization.

Fecal Coliform per Site vs. Time



Attachment B

Prepared by Suzanne M. Michel, Ph.D. Water Resources Geography

Qualitative Data Submitted

- Bizarri, Tiza. 2000. MTBE and the Future of Clean Water in Lakeside, California. Senior Thesis. Department of Political Science. San Diego State University. May. Chapter 2, pages 5-9.
- California State of, Regional Water Quality Control Board, Region 9. 1007. Adoption of Order No. 97-63 "Waste Discharge Requirements for the U.S. Navy, Project P-338S, Pier 3, Dredging San Diego County" File: 05-0843.02
- Cohen, Moses. Engelhardt, Casey and Shawn Neville. Pollution in the San Diego River. Power Point Presentation. Presentation contains photos of potentially contaminating activities in the San Diego River Valley near Mission Ponds and Admiral Baker Field.
- Collingsworth, Van K. 2001. San Diego River Photographic Tour of a Polluted Watershed – Santee Segment. Computer file e-mailed to RWQCB May 10, 2001.
- El Cajon, City of. Notice of release of Toxic Substances in Forrester Creek. Letter dated July 6, 2000 and San Diego County Notice dated May, 5 2001.
- San Diego, County of. 2001. San Diego River Watershed Management Plan.
- Rodgers, Terry. 2000. Sewer Line that Broke Had Failed Repeatedly. *San Diego Union Tribune*. March 14.
- York, Diane. Folder entitled: Lakeside a River Runs Through It. Media clippings and photos of conditions in the San Diego River, Lakeside CA.
- York, Diane. Videotape. Media Coverage of Lakeside Land Investigation, Bill Signs Trucking Permit Violation Observations, USDRIP Hearing, San Diego County Board of Supervisors, August 2000.

Analysis of Qualitative Data

Residents of East County have for years been aware of actions which degrade water quality and riparian habitat in the San Diego River. These actions have been both condoned by local governments, or have been conducted illegally, often at nighttime. Since water quality testing requires training and a substantial capital investment, local volunteers are submitting to the regional board qualitative data. Data has been obtained through document analysis of government and media documents, observations of illegal polluting activities in the river, interviews of informants or simply observing visual conditions of water quality impairment. In addition, the San Diego River Watershed Management Plan is submitted that describes the significant water quality problems present in the River Basin (see sections entitled Problems Being Addressed, Problem Statement, and Specific Water Quality Goals).

The Board should note that certain regions of the San Diego River are inaccessible due to actions of private property owners. In Lakeside for example much of the river is fenced off with signs saying "No Trespassing." Given this fact of inaccessibility any water quality testing would be impossible. Hence, the only data we were able to obtain was via videotaping or photographs on hills surrounding the River.

These observations demonstrate that even though the County and the Regional Board permit industrial activities, these activities continue to deposit pollutants into the River.

In one instance residents filmed truck washing in Lakeside. This violation of the storm water permit was reported to a Regional Board representative, and the Regional Board representative informed the permittee violator (Bill Sign's Trucking). Subsequently, a Bill Sign's Trucking representative threatened the two men who had conducted the videotaping verbally. This incident and other threatening activities by landowners in Lakeside has instilled an atmosphere of fear. It was very difficult to obtain information, since residents have been threatened and did not want their identities revealed. The Regional Board should investigate the incident concerning Bill Sign's Trucking (June 10, 2000), and establish protocol that if information is submitted one's identity is protected.

Besides videotapes, film data and document analysis, personal testimonies are submitted. The personal testimonies were recorded during the public hearing concerning water quality issues for the Upper San Diego River Improvement Project or USDRIP in Lakeside. This hearing was conducted by the San Diego County Board of Supervisors and indicates ethnographic data concerning degrading water and riparian habitat quality in the San Diego River. This hearing along with other media documents submitted in the "Lakeside a River Runs through It" folder indicates the very high level of concern Lakeside residents have at the status and future of the San Diego River and the Santee-El Monte groundwater basin beneath the River.

Below is an overview of qualitative data submitted indicating hotspots. In these hotspots the Regional Board should review their data and other data submitted. At these sites water quality does not support the following beneficial uses: contact water recreation, warm freshwater habitat, cold freshwater habitat, wildlife habitat and rare or endangered species. In addition, since the Santee-El Monte Groundwater Basin (an unconfined groundwater basin beneath the San Diego River in East County), supports municipal drinking water sources and has been contaminated by above ground land uses, the Board should pay special attention to surface water conditions above the groundwater basin. In ALL areas, the Regional Board should set up monitoring sites

Lakeside: The entire length of the San Diego River, especially areas within the Upper San Diego River Improvement District (USDRIP), areas zoned M52, M54 and M58 (to the base of San Vicente Dam) and Los Coches Creek. A portion of Lakeside's San Diego riverbed is owned by Lakeside Land, a company that is currently under investigation for illegal dumping of contaminants in the River and destruction of riparian habitat. In the enclosed videotape and notebook (Lakeside a River Runs Through It) we have compiled media coverage of California's Fish and Games raid upon the site.

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