

SAN PASQUAL

GROUNDWATER MANAGEMENT PLAN



Appendix A

Lease Agreements – Excerpts Pertaining to Environmental Protection

of LESSEE under this provision shall explicitly be subject to the provisions of Section 5.3, Waste, Damage or Destruction, hereof.

- b. LESSEE shall prepare the land for planting in a manner consistent with good agricultural practice, taking maximum advantage of natural water sources. Such actions of LESSEE shall be performed in a manner satisfactory to the City Manager.
- c. LESSEE shall install a drag hose, rainbird-type sprinkler head or approved type of irrigation system of sufficient size to irrigate the acreage devoted to crop production. The main lines shall consist of either agricultural grade transite or City-approved plastic. The hoses and sprinklers shall be adequately sized so as to properly distribute the water over the usable acreage in the required time.
- d. Disagreements as to sound agricultural and/or husbandry practices shall be submitted to a mutually acceptable governmental agricultural authority located in the County of San Diego. CITY and LESSEE agree to accept the decisions of such authority as final. In the event that LESSEE fails to cure any unauthorized practice, then this lease shall be treated in accordance with Section 4.4, Defaults and Remedies, hereof. All permanent plantings, as well as all other improvements to the property, shall become the property of CITY at the expiration or sooner termination of this lease agreement.

8.2 Water Quality - Best Management Practices and Storm Water Pollution Prevention Plan. CITY and LESSEE are committed to the implementation of programs to manage activities on the premises in a manner which aids in the protection of the City of San Diego's precious water resources. LESSEE shall comply with the Best Management Practices ("BMP") including the Storm Water Pollution Prevention Plan ("SWPP") approved by CITY's Storm Water Management Program. LESSEE shall submit for review and approval by the City Manager or his designee, within ninety (90) days of the execution of this lease, BMP and SWPP that will control erosion and reduce the amount of pollutants and other sediments discharged from the premises. The BMP and SWPP will be reviewed periodically by CITY. Upon written notice from the City Manager requesting an update of the BMP, LESSEE shall submit updated BMP and SWPP for City Manager review and approval within ninety (90) days of receipt of notice. LESSEE shall implement any necessary changes to the BMP and SWPP as a result of any review by CITY to ensure compliance with any changes in laws or regulations.

When the BMP and SWPP have been developed and implemented by LESSEE, it is crucial that the practices be enforced and maintained. It is LESSEE'S

responsibility to inform employees, contractors, subcontractors, agents and vendors of the BMP and SWPP. LESSEE shall take proper corrective action, to the satisfaction of CITY, to prevent the infestation of noxious weeds, pests, and erosion throughout the entire leased premises.

- 8.3 Reporting Requirements for Agricultural Practices. LESSEE agrees to provide to the Water Department regular reports about the agricultural activities conducted on the leased property. These reports will detail the usage of water, pesticides, herbicides, fertilizers, and soil amendments; as well as the crops grown. The required reports are specified in Resource Management Plan.
- 8.4 Noxious Weeds, Pests, and Erosion. LESSEE shall take proper corrective action, to the satisfaction of CITY, to prevent the infestation of noxious weeds, pests, and erosion throughout the entire leased premises.
- 8.5 No Warranty. CITY does not warrant that the premises are suitable for the purposes for which they are leased as stated herein.
- 8.6 Cutting of Trees. No growing or mature trees are to be destroyed or removed without prior written consent of the City Manager; trees growing along roadways may be trimmed back as required by the LESSEE. However, trees growing in man-made ditches may be removed by LESSEE. Trees growing in natural drainage channels may not be removed without written consent of the City Manager.
- 8.7 Hold Harmless. Flood Damage and Other Acts of God. LESSEE understands and agrees that the leasehold area is subject to flood damage and that other damage may result to the leasehold from other circumstances, including weather conditions and such causes as fire and earthquakes. LESSEE agrees that any damages resulting from flooding or such other causes shall not result in any liability on the part of the CITY, and LESSEE specifically agrees to assume the defense of, indemnify, and hold CITY harmless for any such damages. LESSEE further specifically agrees that CITY shall have no obligation whatsoever to construct or maintain channels or to construct, maintain, or operate reservoirs or release water from reservoirs in such a way as to control, alleviate, or minimize potential damages to the leasehold area. LESSEE specifically assumes the risk of all damages resulting from flooding or weather conditions or other natural causes. LESSEE is authorized to minimize potential flood damage through improved drainage and other flood control improvements as agree upon with CITY.

Were it not for LESSEE'S agreement to assume all risk regarding flooding and LESSEE'S further agreement that CITY has absolutely no obligation with regard

9.7 Hazardous/Toxic Waste. Other than approved agricultural chemicals, i.e., insecticides, pesticides, herbicides, and fungicides applied in accordance with all applicable regulations, LESSEE will not allow the installation or release of hazardous substances in, on, under or from the premises. For the purposes of this provision, a release shall include, but not be limited to, any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leeching, dumping, or otherwise disposing of hazardous substance. "Hazardous substances" shall mean those hazardous substances listed by the Environmental Protection Agency in regularly released reports and any other substances incorporated into the State's list of hazardous substances. A copy of the presently effective EPA and the State lists is on file in the City Clerk's office as City Clerk Document 769704-1.

In the event of any release of a hazardous substance, LESSEE shall be responsible for all costs of remediation and removal of such substances in accordance with applicable rules and regulations of governmental authorities.

LESSEE agrees to assume the defense of, indemnify and hold the CITY, its elected officials, officers, agents, representatives and employees, harmless from any and all claims, costs and expenses related to environmental liabilities resulting from LESSEE'S operations on the premises, including, but not limited to, costs of environmental assessments, cost of remediation and removal, any necessary response costs, damage for injury to natural resources or the public, and costs of any health assessment or health effect studies.

If LESSEE knows or has reasonable cause to believe that any hazardous substance has been released on or beneath the premises, LESSEE shall give written notice to the City Manager within ten (10) days of receipt of such knowledge or cause for belief. Provided, however, if LESSEE knows, or has reasonable cause to believe that such substance is an imminent and substantial danger to public health and safety, LESSEE shall notify the City Manager immediately upon receipt of this knowledge or belief and shall take all acts necessary to alleviate such danger. LESSEE will notify the City Manager immediately of any notice of violation received or initiation of environmental action or private suits relative to the premises. In addition, LESSEE and LESSEE'S sublessees shall not utilize or sell any hazardous substance on the property without the prior written consent of the CITY.

Appendix B

Summary Descriptions of Groundwater Management Planning Efforts in the
Vicinity of San Diego

Borrego Water District

The Borrego Water District's service area is located approximately 50 miles to the east of the SPGMP area (Error! Reference source not found.). The Borrego Water District Groundwater Management Plan (BWDGMP) was adopted on October 18, 2002. The goal of the BWDGMP is as follows:

"The goal of this study is to provide a long-range groundwater management plan for the Borrego Valley that will minimize overdrafting of the aquifer and enhance the recharge capabilities while providing a dependable supply of water for the reasonable growth of the valley. This plan should do so in a manner that is equitable to the current users of the aquifer and economically feasible for future users."

The components of the BWDGMP are based upon the CDWR Draft Guidelines and include reliability, public input, regional groundwater management, integrated planning, management objectives, data monitoring and evaluation, implementation, and periodic re-evaluation.

The BWDGMP contains the following nine BMOs:

- 1) Adopt programs and approaches to groundwater management that will incrementally reduce the annual decline in water levels of monitored wells;
- 2) Evaluate all programs adopted for groundwater management to assess their impact on the long-term water resources of the adjacent land in the state park;
- 3) Implement programs to improve the measurement of all water uses in the valley;
- 4) Develop additional programs to measure the water resources of the aquifer;
- 5) Establish standards for reduction of water use for all categories of land use and develop programs to meet those standards;
- 6) Maintain water quality throughout the valley at the current standard;
- 7) Assure that the appropriate agencies, particularly the BWD, evaluate any new land use in terms of its projected impact upon the valley's groundwater resources;

- 8) Work with public and private entities to acquire agricultural land from willing sellers;
and
- 9) Determine the maximum amount of water that can be obtained from adjacent basins and evaluate programs to acquire land and construct the necessary facilities to make maximum use of these resources.

San Luis Rey Municipal Water District

The San Luis Rey Municipal Water District's service area is located approximately 20 miles to the north of the SPGMP area (Error! Reference source not found.). A groundwater management plan document was completed in 1996. There is no information regarding whether the plan has been implemented.

Sweetwater Authority

The Sweetwater Authority's service area is located approximately 30 miles to the southwest of the SPGMP area (Error! Reference source not found.). An interim GMP was developed for the Sweetwater Authority to commence groundwater management in the area until a subsequent plan is adopted by the Sweetwater Authority Governing Board, pursuant to Water Code Section 10750 et seq. (AB3030).

The Sweetwater Valley basin is described in the State of CDWR Bulletin Number 118 as basin number 9-17 (CDWR, 2003). Implementation of the groundwater management plan involves managing groundwater levels and protecting groundwater quality within the watershed of the Sweetwater River, the Sweetwater Valley basin, and the San Diego Formation within the service area of the Sweetwater Authority.

The groundwater management strategies as described in the interim plan include the following:

- Maintain static groundwater levels
- Protect groundwater from pollution by man-made activities
- Monitor seawater intrusion
- Monitor groundwater quality and quantity
- Sweetwater Authority groundwater projects

- Develop new or expanded groundwater supplies
- Development of relationships with state and local regulation agencies – United States Bureau of Reclamation (USBR) and United States Geological Survey (USGS)

The interim plan states that Sweetwater Authority will maintain a database of groundwater levels and water quality for existing monitoring wells within the Sweetwater Valley basin.

Rainbow Valley Basin Groundwater Management Plan

The Rainbow Valley service area is located approximately 15 miles to the northwest of the SPGMP area, adjacent to Riverside County (Error! Reference source not found.). The Rainbow Valley Basin Groundwater Management Plan (RVBGMP) was prepared in accordance with the Water Code Section 10750 et seq. (AB3030).

The Rainbow Valley basin is located within the Rainbow Valley Watershed, which is a 5,864 acre watershed. The Rainbow Valley basin is surrounded by foothills of granitic rock. The increased storage of water in the aquifer has led to high water tables, failure of septic systems, and perennial flow of Rainbow Creek. The majority of the water imported into the basin is used for irrigation of agricultural land.

The objectives of the RVBGMP are related to the use of only imported water, the high water table, and poor water quality. The following objectives have been identified in the RVBGMP:

- Provide a safe, reliable local water supply,
- Reduce dependence on imported water by developing a new local groundwater supply,
- Lower the groundwater table within the Rainbow Valley east of I-15,
- Improve water quality (both surface and groundwater), and
- Educate the agricultural and residential communities regarding best management practices they can implement.

The RVBGMP was developed as the first comprehensive study of the hydrologic conditions of the Rainbow Valley basin, including compilation and analysis of previously collected data and additional data collection and monitoring to fill data gaps. The recommended future actions include additional data collection and feasibility studies to investigate the potential for groundwater production projects. Additional data will help to develop a better understanding of the basin and ultimately determine the potential for extraction of groundwater from the residual aquifer.

Appendix C

Summary Descriptions of Other Water Management Efforts Underway in
the Region

1. San Pasqual Valley

The following section provides a summary of management efforts that have taken place within the San Pasqual Valley.

1.1. Rancho Bernardo Reclaimed Water Facilities Plan and San Pasqual Valley Groundwater Management Concepts, 1993

The City of San Diego initiated a study in 1990 to investigate the management of wastewater and reclaimed water facilities in the northern limits the City limits which is not served by the Metropolitan Sewage System. The San Pasqual Valley Wastewater Management and Water Reclamation Project included two phases, Phase 1 – Feasibility and Phase 2 – Facilities Plan.

The purpose of the Phase 2 – Facilities Plan was to develop and evaluate alternative facilities to distribute reclaimed water from the Hale Avenue Resource Recovery Facility (HARRF) in Escondido to identified users in San Diego. The scope of the Facilities Plan included the following: (1) Preparation of a reclaimed water marketing analysis of municipal and industrial users in Rancho Bernardo and within the Wild Animal Park in the San Pasqual Valley, (2) development of a reclaimed water distribution system and a computer model to predict the optimal size of pipelines, pump stations and operation storage reservoirs, (3) development of a conceptual Groundwater Management Plan (GMP) to optimize development and utilization of the San Pasqual Valley's water resources, and (4) investigation of alternative funding options available to the San Diego for the Reclaimed Water Distribution System and the Groundwater Management Plan.

The goal of the third scope item was to develop and implement a GMP that would help to improve the existing water quality in the San Pasqual Valley basin and the Hodges basin. The plan proposed that the objective could be met by controlling recharge of poor quality runoff, enhancing recharge of high quality runoff, and by implementing land use controls. Five alternative plans were proposed and analyzed for both economic and non-monetary factors. A preferred alternative was selected,

but additional issues with implementing the GMP were identified and included the following:

price of reclaimed water from Escondido to be used for artificial recharge,

implementation of a management fee for groundwater pumping and other uses in the San Pasqual and Hodges basins, and

future facilities to use Lake Hodges as a raw water source by the City of San Diego.

Additional studies that address these issues were identified and were to be required before implementation of a GMP.

1.2. San Pasqual Water Resources Strategic Plan Draft, 1994

The purpose of the San Pasqual Water Resources Strategic Plan was to develop a comprehensive goal and strategic plan to achieve that goal, for management of water resources in the San Pasqual Valley. A number of goals in the strategic plan for water resources management were identified including the following:

Develop new sources to increase local water supply,

Develop emergency water storage capacity,

Increase groundwater and surface water quality in reservoirs through renovation techniques,

Support agriculture in San Pasqual Valley,

Support environmental conservation programs in San Pasqual Valley,

Develop reclaimed water supplies that have competitive prices with future water costs,

Manage property owned by the water utility in San Pasqual Valley in an environmentally and fiscally sound manner, and

Provide input as the primary landowner within the San Pasqual Valley into the Community Plan Update process.

The plan recommended utilizing the San Pasqual groundwater basin as a storage medium, which led to the inclusion of a basin management plan in the strategic plan. The basin management plan was to do the following:

Renovate groundwater quality,

Provide a place to store water at the lowest cost,

Provide a new supply of water for use locally, for transfers, or to the imported water system, and

Provide a place to store unsold reclaimed water from Aqua III¹ or the HARRF.

Environmental enhancement through wetland restoration and increased revenue through conjunctive use of groundwater were mentioned as two possible benefits of the recommended strategy.

1.3. San Pasqual Valley Water Resources Management Plan, 1997

The San Pasqual Valley Water Resources Management Plan discusses opportunities for the development of alternative water supplies, such as groundwater, reclaimed water, seawater desalination, and water repurification. This plan consists of four distinct projects that aim to maximize the benefits of the primary landowner's (City of San Diego's) assets in the San Pasqual Valley. Each of the four projects was outlined to benefit a specific stakeholder group, which would then be responsible for financing and managing the project. The four projects include the Watershed Management Project, the San Pasqual Valley Groundwater Management Project, the Riparian Corridor Management Project, and the Industrial Brine Export System.

The Groundwater Management Project involved evaluating the current operation of the San Pasqual Reclamation Facility and possible re-engineering of the existing facility. Four scenarios were considered and analyzed for the potential return on investment. Based upon the results of the analysis, multiple cost-effective and technically feasible options were available for the City to pursue. The Plant Expansion Alternative was recommended because the alternative provides the highest return on investment and a positive net cash flow to the City. It was recommended

¹ Aqua III refers to the San Pasqual Water Reclamation Facility.

that the alternative should be further pursued by completing additional studies on means of brine disposal and environmental considerations.

2. City of San Diego

The following section provides a summary of other management efforts that are underway in the City of San Diego.

2.1. General Plan

The City of San Diego's General Plan was first adopted in 1967. An update of the General Plan and Progress Guide was completed in 1979. The next two decades were characterized by growth and an evolving economy within the City. Residential growth extended to the City jurisdictional boundaries. The economic base expanded from tourism and defense to include high technology research and manufacturing, and international trade. Following these two decades, the City Council developed a Strategic Framework Element in 2002 to guide in the comprehensive update of the entire Progress Guide and General Plan from 1979.

The Strategic Framework Element includes an element on Public Facilities, Services, and Safety that includes a subsection on the Water Infrastructure within San Diego. The goal of the Water Infrastructure section is to provide a safe, reliable, and cost-effective source of water to the City of San Diego. Policies have been designated to meet this goal and include the following:

PF-H.1. Optimize the use of imported supplies and improve reliability by increasing alternative water sources to: provide adequate water supplies for present uses, accommodate future growth, attract and support commercial and industrial development, and supply local agriculture.

PF-H.2. Provide and maintain essential water storage, treatment, and supply facilities and infrastructure to serve existing and future development.

PF-H.3. Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future development and maintain adequate service levels.

The San Pasqual Vision Plan identifies the San Pasqual Valley groundwater basin as a potential site for groundwater storage to efficiently store surplus surface water or imported water, which would contribute to Policy PF-H1b.

In 1995, San Diego adopted the San Pasqual Valley Plan that includes specific goals aimed at the long-term protection and management of the San Pasqual Valley (Valley). The San Pasqual Valley Plan is now included within the City's General Plan. The Valley was also identified as a region for development of potential groundwater resources. The City of San Diego is responsible for following through with directives written in the San Pasqual Valley Plan.

2.2. Integrated Regional Water Management Plan

The Integrated Regional Water Management Plan (IRWMP) for the City of San Diego is being prepared to coordinate water resource management efforts and to enable the San Diego Region to apply for grants tied to IRWM Planning. SDCWA issued a request for proposals (RFP) for an Integrated Regional Water Management (IRWM) Plan Grant Application and a Stakeholder Outreach Phase II Project, on January 29, 2007. The projects selected for inclusion within the final plan must be submitted by April 2007. As this document has not been finalized, projects related to the SPGMP area are currently unknown.

3: Regional Management Efforts

The following section describes management efforts or ordinances within the SPGMP region.

3.1. San Diego County Groundwater Ordinance

Currently, two groundwater ordinances are in place in San Diego County, ordinance numbers 7994 (N.S.) and 9644 (N.S.). The goals of the ordinances are to protect, preserve, and maintain the groundwater resources within the entire San Diego County. Both of the ordinances were written to ensure that agricultural development does not occur in groundwater dependent areas of the County unless there is an adequate groundwater supply for the existing and proposed uses of the land. Agriculture is prevalent within the San Pasqual Valley and is primarily dependent upon groundwater. Agriculture in San Diego County is recognized to provide

sustainable benefits. Therefore, the adoptions of these ordinances are not meant to limit or restrict agricultural activities.

3.2. San Diego County Water Authority

The following section provides information about management efforts taking place through the SDCWA.

3.2.1. Urban Water Management Plan

The SDCWA adopted an UWMP in 2000 and updated it again in 2005. The UWMP was prepared in compliance with the California Urban Water Management Planning Act as well as Water Code sections enacted with the passage of Senate Bills 610 and 221 in 2001. The 2005 UWMP presents and discusses water demands, demand management, SDCWA water supplies, member agency supplies, Metropolitan imported water supplies, water quality, and a shortage contingency analysis. The 2005 UWMP also identifies a number of water resources opportunities, which are expected to be developed over the next 25 years to ensure long-term water supply reliability to the region, including the development of the SDCWA water treatment plant, the emergency storage project (ESP), and the carryover storage project (CSP). As part of the UWMP, water conservation measures have been addressed and several have been established. In addition to these measures, a number of actions towards developing a 50-million gallon per day (mgd) seawater desalination facility have been completed.

As mentioned previously, SDCWA provides water to the City of San Diego; however, within the San Pasqual Valley, water use is primarily from self-supplied groundwater.

In 2006, the total percentage of water delivered to SDCWA from MWD had decreased to 73%. The projections for SDCWA's water supply in 2020 show a more diversified water supply portfolio, the relative percentages shown in **Table C-1** below.

Table C-1 – SDCWA’s Current and Projected Water Supply Portfolio

SDCWA Water Supply	
2006	
	Percentage (%)
MWD	73
Surface water	11
Conservation	7
Imperial Irrigation District Transfer	5
Recycled water	2
Groundwater	2

2020	
MWD	29
Imperial Irrigation District Transfer	22
Conservation	11
Seawater Desalination	10
Canal Lining Transfers	9
Surface water	7
Recycled water	6
Groundwater	6

3.2.2. SDCWA Groundwater Report (June 1997)

The SDCWA prepared the Groundwater Report in June 1997 to help in developing a Groundwater Implementation Plan, as well as to act as a reference document that will be updated periodically. The Groundwater Report was prepared to serve the following purposes:

Provide an overview of groundwater occurrence and availability within the SDCWA service area;

Identify general opportunities and constraints to groundwater development and conjunctive use;

Identify, summarize, and evaluate existing, planned, and potential groundwater projects within the Authority service area; and

Provide other information that will assist the SDCWA in developing a Groundwater Implementation Plan, and in evaluating and refining the SDCWA's Water Resources Plan groundwater supply projections and Strategic Plan goals.

3.2.3. Regional Facilities Master Plan

The purpose of SDCWA's Regional Water Facilities Master Plan (Master Plan) is to evaluate their ability to continue to provide a safe and reliable water supply to member agencies. The Master Plan serves as an outline for implementing additional facilities and improvements to existing facilities that are needed in order for SDCWA to cost effectively meet their mission through 2030. The Master Plan is made up of three interrelated components including water demands, water supplies, and facilities. Facility planning first involved estimating the water demands of the region and then identifying the facilities that would be needed to treat and transport water supplies. The Master Plan defined three scenarios to model facility alternatives. The different facility alternatives include 18 to 25 potential projects, which will be evaluated for their reliability, cost, and ranking within a set of qualitative criteria. The three Master Plan alternatives include the following:

Alternative 1: Conveyance of Supplies From the North, or Metropolitan with Pipeline
6

Alternative 2: Conveyance of Supplies From the West, or Regional Seawater Desalination (the Proposed Project)

Alternative 3: Conveyance of Supplies from the East, or Regional Colorado River Conveyance Facility

The Master Plan includes the following objectives:

Plan for future treated and untreated water supplies and facilities to meet the projected demands of a growing regional population;

Protect the public's health, safety and welfare by maintaining and enhancing a safe and reliable supply of water;

Plan facilities that are cost-effective; and

Provide an ability to adjust facility plans to meet changes in future demands.

In 1999, the SDCWA Board of Directors authorized the San Diego Formation Groundwater Storage and Recovery Feasibility Study and the Lower San Luis Rey River Valley Groundwater Storage and Recovery Feasibility Study to better quantify future regional water storage requirements. The goal of the Feasibility Studies is to identify the best storage and supply option for the region. By identifying the best combination of imported and local water facilities, SDCWA will be able to meet the region's long term needs for water supply, quality, and reliability.

3.2.4. San Diego Formation Groundwater Storage and Recovery Feasibility Study: Phase 1

A three-phase feasibility study of the San Diego Formation is underway and being conducted by the SDCWA. The purpose of the study is to investigate the feasibility of utilizing the San Diego Formation for the storage of surface water supplies (conjunctive use). The primary goal of the first phase of the San Diego Formation Groundwater Storage and Recovery Feasibility Study was to identify cost-effective and regionally beneficial storage alternatives and to identify potential well sites, all of which will be looked at in a further detailed analysis in Phases 2 and 3.

The results from the first phase of this study indicate that the gross storage potential of the San Diego Formation (Formation) is high, but the "usable" storage capacity is constrained by such things as the potential for inducing land subsidence and saltwater intrusion. The total gross storage potential of the Formation is approximately 2 million acre-feet (MAF) or more of water. However, the practical constraints above and the economic or siting issues associated with accessing the Formation reduce the

estimated usable storage capacity to between 40,000 and 90,000 Acre-feet/year (AF/yr) if all the project concepts discussed in Phase 1 were implemented.

3.2.5. *San Luis Rey River Valley Feasibility Study*

A three-phase feasibility study is being conducted by the SDCWA within the Lower San Luis Rey River Valley. Phase II of the study was completed in March 2005. The purpose of the study is to investigate the feasibility of utilizing the Mission and Bonsall groundwater basins for storing surface water supplies (conjunctive use).

3.2.6. *Facilities Description*

Metropolitan delivers imported water to SDCWA from Lake Skinner in Riverside County to a facility approximately six miles south of the Riverside-San Diego County line. The imported water is delivered to SDCWA member agencies through five pipelines, 48 to 108 inches in diameter that traverse the county north to south. The pipelines carry either filtered or raw water and have a combined capacity to carry 900 MGD.

The majority of the pipelines in the aqueduct system deliver water by gravity, but pipeline sections built after 1993 were constructed to withstand pumping pressure. This capability would be used to send water in the opposite direction in case of an emergency.

The pipelines within the system are divided into two alignments, the First Aqueduct and the Second Aqueduct. The First Aqueduct includes Pipelines 1 and 2 and the Second Aqueduct includes Pipelines 3, 4, and 5. The pipeline sections built after 1993 have names that reflect the communities where they are located. Four additional short pipelines run east to west and connect the two aqueducts.

The aqueduct system has additional components to keep water flowing including flow control facilities, pump stations, and other facilities that need to be operated continuously. The facilities are necessary to ensure that the correct amount of water is flowing to meet the needs of member agencies and their customers.

The First Aqueduct (Pipelines 1 and 2) runs through the westernmost portion of the SPGMP area and the City of Escondido. These pipelines carry raw water and are fed by the Crossover Pipeline. The Crossover Pipeline runs from the Second Aqueduct at the Diversion Structure in Twin Oaks Valley (north of San Marcos) and connects to Pipelines 1 and 2 at Hubbard Hill in the northern area of the City of Escondido. From

this point Pipelines 1 and 2 run south through the City of Escondido and across Lake Hodges just east of Interstate 15 continuing southerly to San Vicente Reservoir in the Lakeside area. From the First Aqueduct, the Crossover Pipeline runs northwest from the City of Escondido to meet the Second Aqueduct.

3.3. City of Escondido

Escondido's UWMP was adopted in 2000. An updated, "complete" version of the UWMP was produced in 2005. The UWMP was written in compliance with the California Urban Water Management Planning Act. The City of Escondido is a member agency of the SDCWA and will work in order to ensure water supply reliability for the City. In the event of a water shortage, Escondido will utilize established water conservation plans and action plans outlined in SDCWA's 2005 UWMP, to assist in maintaining adequate water supplies. The urban water management practices of Escondido are of interest to the San Pasqual Valley because surface water supplies could be negatively impacted by urban runoff from Escondido. Cloverdale Creek is a small stream that supplies the San Pasqual Valley basin and that originates within Escondido.

Appendix D

City Council Policy 600-45

COUNCIL POLICY**CURRENT**

SUBJECT: PROTECTION OF WATER, AGRICULTURAL, BIOLOGICAL AND
CULTURAL RESOURCES WITHIN THE SAN PASQUAL VALLEY
POLICY NO.: 600-45
EFFECTIVE DATE: June 27, 2005

BACKGROUND:

For at least 50 years, the San Diego City Council has protected the treasured agricultural preserve of the San Pasqual Valley as well as the public's investment in water resources within the Valley by using land around Lake Hodges and its watershed for agriculture uses which are compatible with the vision to protect water quality, preserve open space and maintain the Valley's rural character.

Beginning in the late 1940's the City of San Diego Water Department began acquiring large parcels of land in the San Pasqual Valley for water-supply purposes. At present time, the City owns most of the land in the Valley, with only a very small portion remaining in private ownership. The Real Estate Assets Department currently manages the land on behalf of the Water Department, leasing the property in a manner which is consistent with the goals of protecting the watershed, rural character and biological resources of the San Pasqual Valley.

The San Pasqual Valley Plan, adopted by the San Diego City Council on June 27th 1995 and amended in March 1996, recognizes the Valley as an important water, agricultural and natural resource, home to San Diego County's most sensitive habitats. The Plan, however, also designates a finite number of sites for limited commercial uses associated with low-impact recreation and agriculture. Today, with the increasing urbanization of surrounding communities, the natural resources of the Valley could be threatened. In the time since the Plan's adoption it has become apparent that some approved land uses are deteriorating the vision for the Valley.

The Multiple Species Conservation Program (MSCP) is a regional conservation plan in which the City of San Diego is a participating member. The City Council, on March 18, 1997, authorized the City's MSCP implementing agreement with the U.S. Fish and Wildlife Agency and the California Fish and Game (R28455), thereby agreeing to implement the City of San Diego MSCP Subarea Plan and other MSCP implementing regulations. Section 1.5.9 of the Subarea Plan sets forth specific management policies and directives for San Pasqual Valley, including biological management measures, land management and planning directives, and access planning guidelines, however these policies do not cover the entire San Pasqual Valley area.

In addition to the adoption of the San Pasqual Valley Plan and the MSCP Subarea Plan, in 2002 the City Council adopted the Strategic Framework Element as part of the City's General Plan Update. The Strategic Framework Element reinforces the preservation of San Pasqual Valley for agricultural use and open space. Further, the General Plan identifies the large City-owned agricultural preserve in the San Pasqual Valley as a unique feature that adds significantly to the overall image and quality of life typical of San Diego.

CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

CURRENT

As an historic step in protecting the San Pasqual Valley's vital water resources, preserving its rural character and encouraging appropriate agricultural uses, in 2004 the San Pasqual Vision Plan was drafted. The plan recognizes the groundwater resources, natural habitat values, sustainable agricultural opportunities, cultural and historic resources, and outdoor recreational opportunities present in the San Pasqual Valley and the responsibility of the City to manage these lands. One of the goals listed in the plan is the preparation and adoption of this Council Policy to prohibit any further commercialization of the San Pasqual Valley and protect the rural character.

PURPOSE:

It is the desire of the City of San Diego to ensure the long-term protection of the significant water resources within the San Pasqual Valley, as these resources will play an important role in helping to meet the City's future water supply needs. It is also the desire of the City to preserve the Valley's significant agricultural areas, sensitive native habitats and unique scenic qualities. The irreplaceable glimpses of San Diego's natural and cultural heritage that are preserved within this Valley must not be lost. Significant biological and cultural resources will be protected and properly managed; quality of the groundwater basin will be ensured; appropriate agricultural activities will be facilitated; and compatible, passive recreational uses will be pursued. All of these goals are to be accomplished for the enjoyment and appreciation of future generations. This Council Policy will reinforce the goals of both the General Plan and the San Pasqual Valley Community Plan, which identify the San Pasqual Valley as an agricultural preserve with significant open space values.

POLICY:

It shall be the policy of the City to preserve the existing rural character of the San Pasqual Valley by tailoring the Valley's zoning and land use policies prohibiting any further commercialization and further protecting the Valley's vital water resources. The City shall protect the quality and capacity of the San Pasqual/Lake Hodges Surface Water and Groundwater Basin as well as protect, enhance and restore sensitive habitats within the Valley. The City shall educate the public on the importance of the Valley's resources, in order to build a sense of stewardship to sustain the long-term success of the important natural resources of the San Pasqual Valley. The City is directed to preserve, promote and sustain agricultural uses in the Valley. The City shall seek to build consensus with surrounding jurisdictions and other entities in order to ensure a mutual understanding of the need to be sensitive to the vision for the Valley. Implementation of this Policy should ensure that the primary goal of protecting water resources and subsequent goals of natural habitat preservation, retention of agriculture, and passive recreation are achieved in a manner which is complimentary to each other, thus avoiding any condition in which one goal would compete with another. Together these actions, along with any additional protections which the City Manager may identify, are intended to ensure the permanent protection of the San Pasqual Valley's unique water, agricultural, biological and cultural resources.

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IMPLEMENTATION:

The protection of water resources, agricultural, biological and cultural resources within the San Pasqual Valley is intended to be implemented through the following actions:

- 1) The City shall institute an amendment to the Land Development Code to tailor the types of uses allowed in the AG-1-1 zone, as to prohibit uses which are detrimental to the vision for the San Pasqual Valley. The City shall next institute a rezone of all City-owned parcels in the Valley from AR-1-1 to AG-1-1, to ensure that all City-owned parcels are in compliance with the vision. This Council Policy is not intended to restrict the ability of the Wild Animal Park to 1) operate its visitor-serving activities within the current or future Park boundaries or 2) to further its animal conservation and propagation mission, including development of new, and renovation or refurbishment of existing, exhibits and facilities, within the limits of its current boundaries or any future leases or rights of entry. Nor is this Policy intended to prohibit those limited commercial uses that are directly associated with the agricultural activities occurring in the Valley. Additionally, the City shall amend the San Pasqual Valley Plan as to strengthen the language describing the types of land uses envisioned for the Valley. In order to complement the Land Development Code Amendment to the AG-1-1 zone, the San Pasqual Valley Plan shall be amended with language clearly establishing the intention for a strict limitation on development within the Valley. The Community Plan language should provide the framework to further protect the Valley's vital natural resources, reinforcing the goals of previously adopted documents to maintain the Valley as an agricultural preserve.
- 2) The City, jointly with other stakeholders, is preparing a San Dieguito River Watershed Management Plan. Preparation of a San Pasqual Groundwater Basin Management Plan is included as part of the City evaluation and potential development of the groundwater while protecting the agriculture resource. These plans shall include an evaluation of how best to effectively protect, manage, and utilize the Valley's water resources, while considering agricultural uses, native habitats, cultural resources, and passive recreational opportunities. As the primary landowner in the San Pasqual Valley, the City of San Diego is responsible for ensuring that there is a high quality drinking water supply for City of San Diego residents. Much of the land owned by the City has the potential to influence the quantity and quality of source water that reaches the groundwater and Lake Hodges, one of the City's water supply reservoirs. The Water Department is responsible for managing these watershed lands and the groundwater basin to meet their water supply objectives.
- 3) In order to provide a comprehensive review of existing and proposed leases in the San Pasqual Valley, the City shall establish a multi-discipline review committee consisting of staff representatives from various City departments. The committee shall prepare an annual report summarizing the status of all leases in the San Pasqual Valley. This report shall also include the status of proposed habitat management actions, as well as the identification of obstacles related to implementation, and a study of leasehold boundaries, including identification of sensitive habitat encroachment. In addition to the report, the City shall establish an encroachment monitoring program to ensure the leaseholders activities are consistent with the terms and conditions of their lease. Finally, the annual report shall provide a summary of ongoing recreation projects in the Valley as well as identify potential areas appropriate for

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habitat restoration activities, consistent with the San Dieguito River Watershed Management Plan, which is currently being developed.

- 4) The City shall work with other public agencies to create a comprehensive interpretive program for the San Pasqual Valley, including the construction of an interpretive center. A major component of any successful habitat preservation project is to educate the citizenry about the importance of the natural features which are contained within that area. In order to ensure the long-term success of the San Pasqual Valley it is important for the residents of San Diego to recognize the Valley's unique natural habitat, its historical role in terms of watershed protection. The Valley is a unique natural and archaeological treasure that is envisioned to become a valuable educational and interpretive resource for the surrounding communities. Interpretive programs often encompass informational exhibits, interpretive stations, interpretive signage, educational resources and materials, as well as interpretive centers. The specific location of trails within the planning area would be proposed by organizations such as the San Dieguito River Park Joint Powers Authority (JPA) and reviewed and approved by the Water, Real Estate Assets and Development Services Departments. Existing resources, including the San Pasqual Battlefield State Historic Park, the San Diego Wild Animal Park, Sikes Adobe, the Mule Hill/San Pasqual Trail, the Orfilia Vineyards, the San Diego Archaeological Center and the Ruth Merrill Interpretive Trail should all become key components which will serve as hubs along a developed interpretive corridor. City staff shall work closely with public agencies, organizations and community members to provide a variety of interpretive and educational resources throughout the Valley.
- 5) The City shall establish a San Pasqual Land Use Task Force to devote its focus and attention to current issues which relate to present San Pasqual Valley leaseholds or which affect the integrity and preservation of the Valley. The Task Force shall evaluate the merits of long-term leases, in order to preserve, promote and sustain agricultural uses which are compatible with the protection of water quality. The San Pasqual Land Use Task Force shall be comprised of a total of nine to eleven members from various community groups, City departments and other agencies, including: the San Pasqual/Lake Hodges Community Planning Group, the Rancho Bernardo Community Planning Board, the San Diego Wild Animal Park, the City's Real Estate Assets Department, the City's Water Department, the City's Planning Department, the Farm Bureau, the Natural Resource Conservation District, and a resident selected by the City Councilmember with jurisdiction over the San Pasqual Valley. Members of the Task Force shall be appointed by the Councilmember with jurisdiction over the San Pasqual Valley. Following the completion of their evaluation of the leasehold process, the Task Force shall submit a report of their findings, including recommendations, to the Councilmember.
- 6) The City shall seek to establish cooperative relationships with the surrounding municipalities, agencies and community planning groups, adjacent to the San Pasqual Valley. Because issues such as water quality, ground water recharge and habitat preservation do not necessarily follow jurisdictional boundaries, governmental bodies and other organizations must work together to protect the beneficial uses of the watershed. In order to ensure that development proposed around the perimeter of the Valley, as well as upstream of the Valley, will not have a negative impact on the qualities and resources of the San Pasqual Valley, the City shall meet

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with neighboring entities to convey the importance of addressing onsite urban runoff and storm water issues, including attention to downstream conditions of concern, flooding, erosion and water quality. In addition, the City shall request that these entities institute a practice of regular notification to the City's Real Estate Assets Department, of any land use proposals around the perimeter of the Valley, which may potentially impact the Valley. This coordination should take account of both public and private development projects, including transportation and public utility projects. The entities involved in this collaborative partnership should specifically include the surrounding jurisdictions of Poway, Escondido and the County of San Diego, as well as other agencies and organizations, including the San Pasqual/Lake Hodges Community Planning Group, the Rancho Bernardo Community Planning Board and the San Dieguito River Park JPA.

- 7) All City Departments shall be required to notify both the San Pasqual/Lake Hodges Community Planning Group and the Rancho Bernardo Community Planning Board of any proposals, public or private, that may affect the lands included within the boundaries of the San Pasqual Valley Plan area. Although the San Pasqual/Lake Hodges Community Planning Group is the City's officially-recognized community planning group for the San Pasqual Valley, per Council Policy 600-24, the Rancho Bernardo Community Planning Board has a long history of participation with land use issues related to the protection of the San Pasqual Valley, therefore will continue this role as well.

- 8) The City shall identify and review ways to ensure the long-term protection of the Valley's unique water, agricultural, biological and cultural resources. One option the City shall explore is the possibility of an amendment to the City Charter establishing the requirement that a majority vote of the people shall be obtained before any development which is inconsistent with the Council-adopted San Pasqual Valley Plan can be approved within the Valley. Included in this potential City Charter amendment should be the language that a majority vote of the people would also be required prior to the sale of any City-owned property within the San Pasqual Valley for purposes other than agriculture or habitat preservation. The City shall also explore the possible establishment of a conservation easement or appropriate land dedication over the Valley to permanently protect water, agricultural and biological resources. Included in this action, the City Attorney shall provide a legal analysis of the applicability of the Williamson Act to publicly-owned agricultural land. Additionally, the City shall explore the potential to dedicate all of the City-owned parcels within the San Pasqual Valley as parkland. All of the above options should take into account the understanding that they would most likely require that the City reimburse the Water Department for the acquisition of the property, as the property was originally purchased for "water storage" purposes. Finally, the City shall study the potential for further land acquisitions to expand the boundaries of the San Pasqual Valley. By exploring these and other options, the City can develop a feasible solution to permanently protecting the precious resources of the San Pasqual Valley.

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PHASING:

The eight steps outlined as the implementation actions in this policy represent a comprehensive strategy for accomplishing the vision for the San Pasqual Valley, to ensure the long-term protection of the Valley's unique water, agricultural, biological and cultural resources.

Initial steps to implement the vision should include:

- A rezone action for all City-owned property in the San Pasqual valley to AG-1-1 (with the exception of the Wild Animal Park).
- A Land Development Code Amendment to the AG-1-1 zone as to forbid a number of non-agricultural uses that are not appropriate in the Valley.
- A Community Plan Amendment to the San Pasqual Valley Plan.
- On a case-by-case basis, consider entering into long-term leases with those uses that are clearly compatible with the vision for the Valley.
- Ensuring that both the San Pasqual/Lake Hodges Community Planning Group and the Rancho Bernardo Community Planning Board are informed of all planning and land use issues that pertain to the San Pasqual Valley Plan Area.
- Exploration of ways to permanently protect the San Pasqual Valley.

Mid-term implementation actions should include:

- Preparation of a San Pasqual/Lake Hodges Surface Water and Groundwater Basin Management Plan.
- Establishment of a San Pasqual Land Use Task Force.
- Creation of a comprehensive interpretive program.

Long-term/ongoing actions include:

- Construction of an interpretive center.
- Preparation of annual status report on leasehold activities.
- Establishment of collaborative partnerships among the adjacent jurisdictions.
- Implementation of the San Dieguito Watershed Management Plan.

HISTORY:

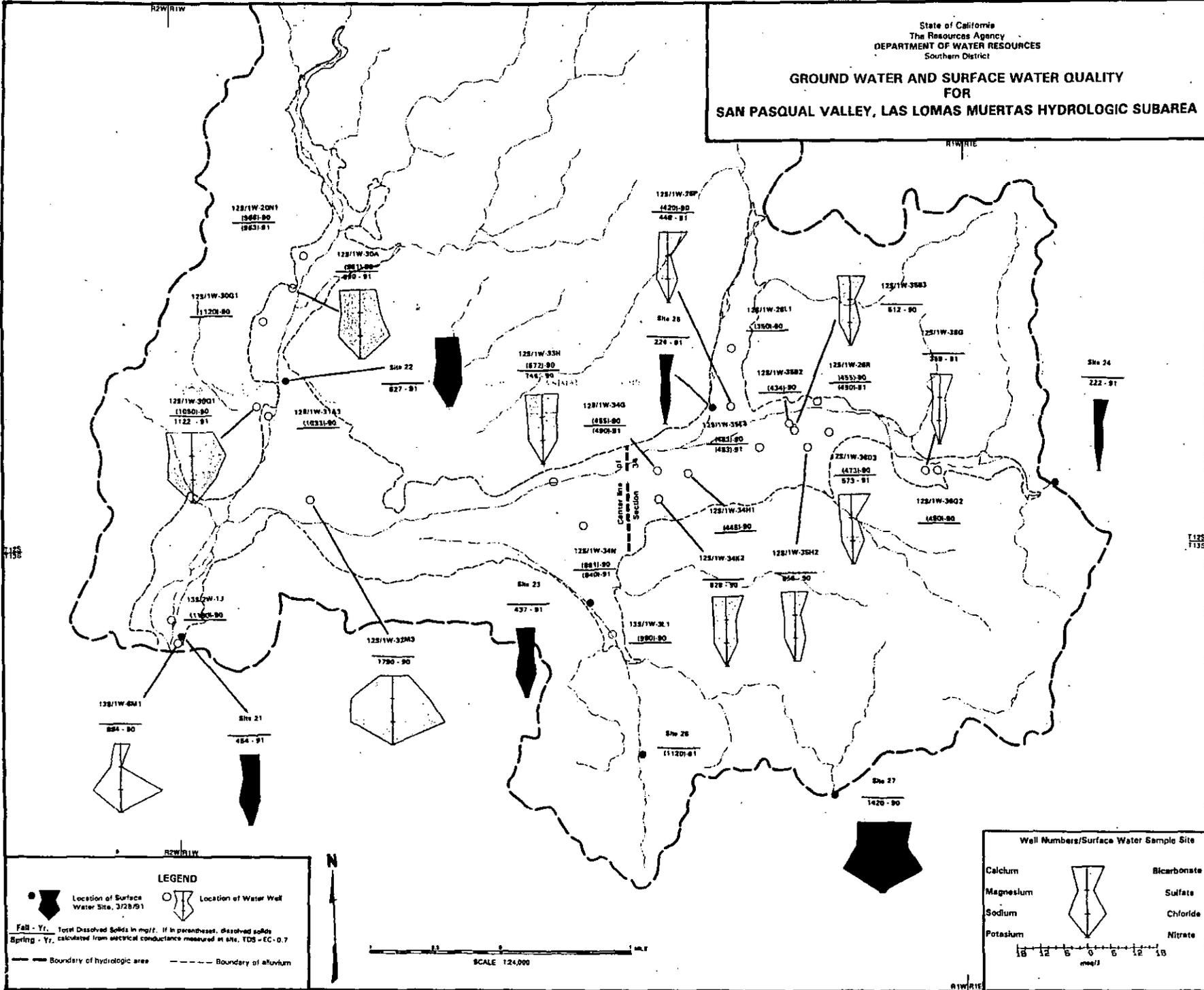
Adopted by Resolution R-300588 06/27/2005

Appendix E

Surface Water Sampling Locations and Summary of Analytical Results –
DWR in March of 1991

State of California
 The Resources Agency
 DEPARTMENT OF WATER RESOURCES
 Southern District

**GROUND WATER AND SURFACE WATER QUALITY
 FOR
 SAN PASQUAL VALLEY, LAS LOMAS MUERTAS HYDROLOGIC SUBAREA**



LEGEND

● Location of Surface Water Site, 3/28/91

○ Location of Water Well

— Boundary of hydrologic area

- - - Boundary of alluvium

Fall - Yr. Total Dissolved Solids in mg/l. If in parentheses, dissolved solids Spring - Yr. calculated from electrical conductance measured at site. TDS - EC - 0.7

Well Numbers/Surface Water Sample Site

Calcium		Bicarbonate
Magnesium		Sulfate
Sodium		Chloride
Potassium		Nitrate

18 12 6 0 6 12 18
 mg/l

Cloverdale Creek (Izbicki, 1983), flows south into the San Dieguito River along the western edge of San Pasqual Valley.

Under natural conditions, stream flow in San Pasqual Valley is intermittent; however, irrigation runoff and waste water discharges cause protracted flow in some streams. For example, much of the flow in Santa Maria Creek comes from the effluent from the Santa Maria Wastewater Treatment Plant (WWTP), which is discharged on spray fields upstream in the Ramona HSA.

On March 28, 1991, surface water samples were collected for mineral analysis at five sites in Las Lomas Muertas HSA. The sampling sites are shown on Plate 8. Site 21 is on the San Dieguito River at the lower end of the subarea, site 22 is on a tributary (Cloverdale Creek) at San Pasqual Road, site 23 is on Santa Maria Creek at Bandy Canyon Road, site 24 is on Santa Ysabel Creek at the upper end of Las Lomas Muertas HSA, and site 25 is on Guejito Creek at San Pasqual Road. Plate 8 also shows site 27 on Santa Maria Creek at the basin divide, where a sample was collected for analysis in March 1990, and site 26 on a small tributary to Santa Maria Creek at Highland Valley Road, where the EC of the water was measured in April 1991. Table 32 shows water temperature, pH and EC, which were measured at each sampling site.

TABLE 32
PARAMETERS MEASURED AT SURFACE WATER SAMPLING SITES
IN LAS LOMAS MUERTAS HYDROLOGIC SUBAREA

SAMPLE SITE ¹	DATE SAMPLED	TEMP. (°F)	pH	EC (µS/cm)	CALCULATED TDS ² (mg/l)
21	3-28-91	56	7.4	590	413
22	3-28-91	56	7.3	875	613
23	3-28-91	51	7.9	600	420
24	3-28-91	49	7.8	320	224
25	3-28-91	54	7.8	360	252
26	4-25-91	58	7.3	1,600	1,120
27	3-13-90	47	8.0	1,760	1,232

1. Refer to Plate 8 for site locations.

2. Calculated TDS = 0.7 x EC.

The surface waters have mixed chemical character, with either sodium-chloride or calcium-bicarbonate as the dominant ions. A detailed ionic characterization for each sample is given in Table 33. Results of the mineral analyses, which are presented in Table 34, show that water quality is generally good and that the concentrations of most constituents are below the water quality objectives and drinking water standards. However, unlike ground water, which typically has fairly consistent quality at a given site, surface water quality can have great seasonal variability. Higher flows can be more diluted. Most of the samples were collected near the end of March 1991, a wet

month in which 9.75 inches of rain were reported at the San Diego Wild Animal Park. No stream flow data are available for the sampling sites, but flow was high enough to wash out some roads in San Pasqual Valley.

TABLE 33
CHARACTERIZATION OF SURFACE WATER QUALITY
IN LAS LOMAS MUERTAS HYDROLOGIC SUBAREA

SAMPLING SITE	DOMINANT CATIONS (in decreasing order of concentration)	DOMINANT ANIONS (in decreasing order of concentration)
21	Na-Ca-Mg	Cl-SO ₄ -HCO ₃
22	Na-Ca-Mg	Cl-SO ₄ -HCO ₃
23	Na-Ca-Mg	HCO ₃
24	Ca-Mg-Na	HCO ₃
25	Ca-Na-Mg	HCO ₃
27	Na-Ca-Mg	Cl-HCO ₃ -SO ₄

Refer to Plate B for site locations.
Na = sodium, Ca = calcium, Mg = magnesium
Cl = chloride, SO₄ = sulfate, HCO₃ = bicarbonate

TABLE 34
SURFACE WATER QUALITY IN LAS LOMAS MUERTAS HYDROLOGIC SUBAREA

Ca	Mg	Na	K	HCO ₃	SO ₄	Cl	NO ₃	F	B	TDS	Hardness	pH	EC
Site 21:													
51.3	21.4	63.3	9.6	117.1	107.6	66.1	30.4	<0.1	0.44	454	216	7.6	770
Site 22:													
67.3	35.0	94.7	9.8	134.2	168.6	124.5	60.9	0.3	0.56	627	312	7.6	1,100
Site 23:													
47.3	19.0	63.2	10.7	122.0	91.0	65.6	24.9	<0.1	0.43	437	196	7.5	740
Site 24:													
26.0	14.6	28.4	2.7	122.0	41.8	34.0	2.6	0.1	0.33	222	130	7.9	370
Site 25:													
30.4	12.6	29.6	2.7	100.0	40.8	41.1	5.6	0.2	0.33	224	126	8.0	400
Site 27:													
130	61	236	6.4	463.6	300	369	1.5	0.6	0.6	1,420	655	8.2	2,290

All values are mg/l except EC, which is µS/cm, and pH, which is unitless.
All samples collected on 3-29-91 except Site 27, which was collected on 3-13-90.
Refer to Plate B for site locations.

Concentrations of most mineral constituents were lower in samples collected in March 1991 than in samples collected by the USGS in March 1982. This apparent improvement in water quality is probably a result of differences in stream discharge

Appendix F

Map of Invasive Non-Native Riparian Plants in San Dieguito River
Watershed

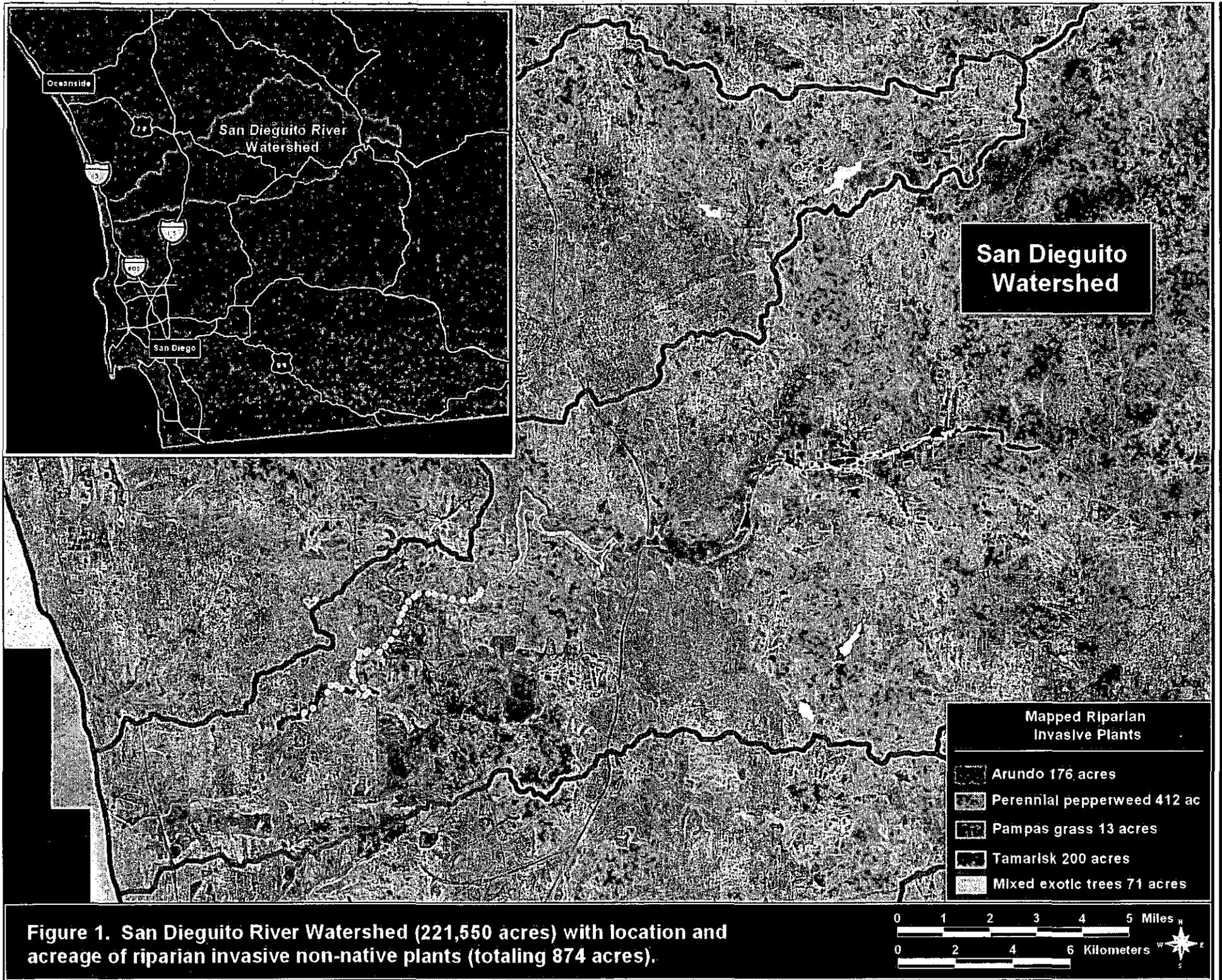


Figure 1. San Dieguito River Watershed (221,550 acres) with location and acreage of riparian invasive non-native plants (totaling 874 acres).

Appendix G

Public Outreach Plan for San Pasqual Groundwater Management Plan

City of San Diego Water Department San Pasqual Basin Groundwater Management Plan Public Outreach Plan

Purpose

The City of San Diego Water Department is developing a Groundwater Management Plan for the San Pasqual Valley, an 11,000-acre region southeast of Escondido. Approximately 90 percent of the valley is owned by the Water Department, which purchased the lands in the 1950s for water supply purposes. The GMP represents one of the ways they are ensuring a long-term, sustainable and good quality water supply for San Diego residents. The GMP will also protect the groundwater, agricultural, biological, and cultural resources within the Valley.

Once completed, the GMP will be included the San Pasqual Valley Plan, a land-use document adopted by the San Diego City Council on June 27, 1995 and amended March 1996. On June 27, 2005, the City Council adopted Policy No. 600-45, an eight-step strategy for accomplishing the vision of the San Pasqual Valley Plan. The GMP joins the San Pasqual/Lake Hodges Surface Water Management Plan, establishment of a San Pasqual Land Use Task Force and creation of a comprehensive interpretive program as mid-term policy implementation actions.

The San Pasqual Valley has various stakeholders who have an interest in the future of the groundwater in the basin. It is home to approximately 400 residents, many of whom are connected to the area's two dairies, an ostrich farm, citrus groves and a winery. It is also home to the San Diego Wild Animal Park.

This outreach plan will identify the stakeholders and interested parties, and recommend communication techniques for each specific group, as well as overall information dissemination strategies during the development and implementation of the GMP.

This plan includes the following components:

- Goals
- Objectives
- Approach: Development Phase
 - Required outreach activities
 - Additional outreach opportunities
- Approach: Implementation Phase
- Evaluation

The activities included in the "required outreach activities" section during the development phase are currently in the Katz & Associates scope of work and are mandated by state regulations. All activities included in the "additional outreach opportunities" section, implementation phase and evaluation are recommendations for

implementation by the Water Department but not currently included in the Katz & Associates scope.

Goal

Clearly and accurately convey project information to ensure ample public involvement opportunities for stakeholders and interested parties in the development and implementation of the GMP.

Objectives

- Reaffirm the GMP's purpose and need
- Provide accurate and timely information to stakeholders and interested parties
- Provide mechanisms for two-way dialog
- Determine the issues of concern to be addressed
- Develop trust and credibility with regard to the development and implementation of the GMP
- Show how community input has been incorporated in the GMP
- Avoid misunderstandings

Outreach Approach: Development Phase

Katz & Associates, in conjunction with the Water Department and MWH, will implement the approach outlined in the following section to achieve the overall objective during the development of the GMP.

Required Outreach Activities

Public Notices. Public notices need to be drafted and published at several stages before and during the GMP development.

Stakeholder and Interested Party Identification. Defining the stakeholders and interested parties for any project is a necessary first step. Stakeholders are those individuals or groups that have a direct stake in the development, implementation and outcome of the GMP. These individuals and groups will be invited to become participating members of the project advisory committee and invited to all open houses. Interested parties include individuals and groups that have an overall interest in the project based on their organization affiliation or political office. These individuals will be added to the project mailing database, and will be invited to observe the PAC and attend the open houses.

Both groups will be identified through conversations with the District 5 council office and the community planning board, discussions with the city of San Diego's Real Estate Asset Department regarding lessees in the San Pasqual Valley and a review of past groundwater management plans. Once the stakeholders and interested parties are identified, contact information will be

compiled and updated in a master mailing database. This list will grow over the course of the project.

An initial list of stakeholders, stakeholder groups and interested parties include, but is not limited to, the following:

- A & W Ranch
- Am-Sod Inc
- Bordier's Nursery, Inc/Pinery Tree Farm
- California State Parks Department, San Diego Coast District
- Carlsbad Municipal Water District
- City of Del Mar, Public Works
- City of Escondido, Public Works/Maintenance
- City of Escondido, Utilities Division
- City of Oceanside, Water Utilities
- City of Poway Development Services
- City of Poway, Public Services Department
- City of San Diego Water Department
- City of San Diego, District 5
- Cloverdale Stables, Inc.
- County of San Diego District 3
- County of San Diego District 5
- County of San Diego, Department of Planning & Land Use
- County of San Diego, Department of Public Works
- Department of Environmental Services
- Department of Health Services
- Endangered Habitats League
- Environmental Health Coalition
- Escondido Creek Conservancy
- Evergreen Nursery Distributors, Inc.
- Friends of the San Dieguito River Valley
- Fallbrook Public Utility District
- Giumarra Of Escondido
- Helix Water District
- Henry Ranch
- Hodges Golf Improvement Center, Loc
- Lessees of city owned land in the San Pasqual Valley
- Natural Resources Conservation Service
- Olivenhain Municipal Water District
- Orfila Vineyards
- Otay Water District
- Padre Dam Municipal Water District
- Palomar Enterprises Inc/Einer Bros Inc
- Pinery Tree Farms
- Rainbow Municipal Water District
- Rancho Bernardo Community Planning Board
- River Park Joint Powers Authority

- San Diego County Farm Bureau
- San Diego Zoo's Wild Animal Park
- San Dieguito River Park
- San Dieguito River Valley Conservancy
- San Dieguito Watershed Stewardship Initiative Group
- San Pasqual Land Use Task Force
- San Pasqual Valley Planning Group
- San Pasqual Academy High School
- Eagle Crest Golf Course
- Lessees of city owned land in the San Pasqual Valley
- San Diego County Water Authority
- Environmental groups (Sierra Club, Audubon Society)
- Ramona Municipal Water District
- Rincon del Diablo Municipal Water District
- SAD Ostrich, Inc.
- San Diego Archaeological Center
- San Diego Conservation Resources Network
- San Diego County Parks
- San Dieguito Water District
- San Pasqual Battlefield State Historical Park
- San Pasqual Christmas Tree Farm, Inc
- San Pasqual Growers
- San Pasqual High School
- Santa Fe Irrigation District
- SDG&E/09
- Sierra Club, San Diego Chapter
- State Of Ca/Dept Of P&R/3
- State Of Ca/Dept Of Parks & Rec
- Suncoast Botanicals, Inc.
- Sweetwater Authority
- The Hodges Golf Improvement Center
- The Nature Conservancy
- The Nature Conservancy, San Diego Field Office
- Three C Growers
- Time Warner Telecom Of California, L.P.
- T-Mobile Use, Inc.
- Trust for Public Land
- Vallecitos Water District
- Valley Center Municipal Water District
- Verger Dairy Farm
- Vista Irrigation District
- Volcan Mountain Preserve Foundation
- Wildlands, Inc.
- Wilkens Nursery
- Witman Ranch Inc
- Yuima Municipal Water District

Project Advisory Committee. One project advisory committee will be established and will include representatives from various stakeholder groups as well as technical advisors. The advisory committee will provide input and recommendations to the Water Department during the development of the GMP and Basin Management Objectives. The committee will be facilitated by a neutral, third-party facilitator from Katz & Associates and will meet up to six times over the course of nine months. The Water Department staff and consultants will provide presentations during the meetings to ensure the members have the information necessary to make informed recommendations.

The members of the project advisory committee will be asked to share information relating to the PAC and the discussion on the GMP with the groups they represent. This will create a “trickle-down” effect for project information.

Representatives from the following organizations are being asked to participate in the PAC:

- San Dieguito River Valley Conservancy
- County of San Diego
- U.S. Geological Survey
- San Diego County Water Authority
- San Dieguito River Park
- Santa Fe Irrigation District
- Konyon Dairy
- San Diego County Farm Bureau
- San Pasqual Valley Planning Group
- City of San Diego Real Estate Assets Department
- San Diego Zoo’s Wild Animal Park
- Department of Water Resources
- Regional Water Quality Board, San Diego Region
- River Park Joint Powers Authority
- Eagle Crest Golf Club
- Rancho Bernardo Community Planning Board
- San Dieguito River Watershed Stewardship Initiative Group
- Witman Ranch

For more information about the committee’s mission statement, principles of participation, member list or schedule please see the Mission Statement and Principles of Participation for the project advisory committee attached to this plan.

Community Open Houses. Over the course of the GMP development, two community open houses will be held, one during the initial stages and the second at the completion of the Draft GMP. These open houses will provide an opportunity for stakeholders and interested parties to learn about the GMP, ask questions and provide comments throughout the development phase.

The open houses will include display boards describing the development and implementation process. City staff and consultants will be available to guide members of the public around the room explaining the boards and answering questions.

The first open house will be held **Wednesday, Dec. 4, 2006** and the second will be held **Wednesday, May 2, 2007**.

Additional Outreach Opportunities

Database. To distribute information about the GMP, a mailing list and e-mail database will be needed. Review any existing mailing list databases and expand or enhance them to reflect key stakeholders, elected officials, media and representatives of key interest groups and stakeholders within the Valley. This database should be updated throughout the project by adding names of individuals who attend the PAC meetings, open houses or request information from the Water Department.

Direct Mailings. Project information, open house and advisory committee meetings notices will be distributed to the project database. These mailings will provide information the greater San Pasqual Valley community, environmental organizations, elected officials and public agencies about the project's progress, meetings and milestones.

Planning Group Meetings. The San Pasqual Valley has an active planning group which meets monthly at the Wild Animal Park. It is important this group is well informed throughout the development of the GMP. Project team members will attend these meetings at key milestones in the process to provide up-to-date information about the project status, as well as hear feedback from the planning group members.

Informational Materials. A variety of informational materials must be produced to provide various audiences with information in formats they prefer. Recommended information pieces include a GMP fact sheet and frequently asked questions document written for the layperson. In addition to the basic fact sheet and FAQ, a GMP project newsletter may developed and distributed to external audiences on a semi-annual or quarterly basis. To enhance the opportunities for two-way communication, all information materials should include Water Department contact information.

Presentations. A general presentation, which includes a description of the GMP and planned improvements during the implementation, will be developed by the Water Department. This presentation can be used at community or council meetings, or at presentations to community organizations.

Web Site. Ensure that copies of all informational materials are posted on the Water Department's Web site. Update the Web site to include a specific section about the GMP and invite users to comment and/or request information; include Water Department contact numbers and e-mail addresses. The URL should be prominently included on all informational materials, as well.

Outreach Approach: Implementation Phase

The Water Department will implement the approach outlined in the following section to achieve the overall objective during the **implementation** of the GMP.

Planning Group Meetings. Continuing to update the San Pasqual Valley Planning Group at the group's scheduled meetings is also important during the implementation of the GMP. City staff will periodically attend the San Pasqual Valley Planning Group meetings and provide updates on the implementation.

Database Maintenance. Identifying and creating a database is only half the battle. The other half entails maintaining that database to ensure the most up-to-date information is included and the most appropriate contacts for each organization are listed. As election years come and go, it is important to update the information on the project database with the appropriate staff and newly elected official. Also important, is the updating of new land lessees and executive directors of organizations. Database maintenance is an ongoing task over the life of the project.

Revise Informational Materials. Revise informational materials created during the GMP development phase to reflect the implementation of the GMP.

Revise Presentations. Revise project presentations created during the GMP development phase to reflect the implementation of the GMP.

Direct Mailings. Continue to mail updates (postcard notices, letters, newsletter, etc.) to the mailing database. Keep the lessees, policy makers, environmental groups and other interested parties apprised of the progress and milestones.

Web site Updates. Update and maintain the established project Web page with new and timely information related to the GMP.

Construction Relations. If the construction of new facilities or monitoring sites is identified in the GMP, a small construction relations effort will be necessary to keep interested parties, stakeholders and agencies informed of the construction activities and schedule. Some outreach methods include:

- **Construction notices:** Similar to the direct mailings recommended above, these notices include construction specific information such as,

work hours, schedule, potential impacts and what the Water Department is doing to address those impacts.

- **Project information line:** Establish a project information line during construction where stakeholders, impacted parties or agencies can call to have questions answered about the construction activities. This can be a “live” hotline or a voicemail that is checked periodically throughout each day and responded to in a timely manner.
- **Tours:** Tours allow the stakeholders an opportunity to view the construction site during or after construction, allowing them to see first hand what will be done at the site and how that impacts the basin and water quality/supply. Tours can be given to groups including lessees, the media, and/or elected officials and policy makers.

Trade Articles. One way to highlight a project’s successes is to draft and submit articles to trade and industry publications. These articles will describe the efforts made during the development and implementation of the GMP, and any unusual practices that may have been instrumental in the project’s success.

Evaluation

Success of the outreach efforts associated with the GMP in the San Pasqual Valley will be measured in several ways. These activities will be conducted by the Water Department to determine the overall success of the program.

Database Size. The stakeholder list will continue to grow and evolve over the course of the project. As this occurs and as the project team learns of new contacts to add to the overall database, the mailing list will be updated. A successful outreach campaign provides the most pertinent and updated information to target audiences.

Questionnaire. Develop and distribute a meeting survey or questionnaire for distribution at the PAC meetings and public open house. Results of the survey can indicate additional outreach needed and effective communication tools. Another option is to distribute the survey electronically to the PAC and open house attendees.

Attendance. Participation in the open houses and advisory committee meetings will be gauged by the use of sign in sheets at every meeting. Attendance at events such as the open house will represent the overall interest in the GMP.

On Schedule. Keeping a project on track and schedule are important indicators of the project’s success. Over the development phase there will be up to six advisory committee meetings and two public open houses. It is important that the dates are identified at the onset of the project and the project team makes a commitment to

meet the specified dates. Setting an unrealistic timeline or not meeting identified dates can hinder a project's success.

Appendix H

Public Notices and Resolutions of Intent

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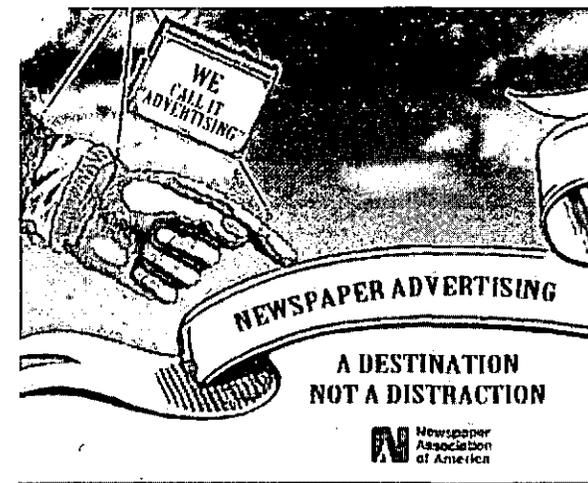
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RESOLUTION NUMBER R-301974 A RESOLUTION OF INTENTION TO DRAFT A GROUNDWATER MANAGEMENT PLAN FOR THE SAN PASQUAL BASIN FOR THE PURPOSES OF IMPLEMENTING THE PLAN AND ESTABLISHING A GROUNDWATER MANAGEMENT PROGRAM AND STATEMENT OF PUBLIC PARTICIPATION WHEREAS, the City of San Diego [City] has provided water service since 1901 and currently serves more than 1.3 million people populating more than 200 square miles of developed land; and WHEREAS, in 2002, the City adopted the Long-Range Water Resources Plan [LRWRP] which evaluated different water supply alternatives for meeting the City's current and future water needs; and WHEREAS, the LRWRP identifies the San Pasqual Basin located in the San Pasqual Valley as a potential source of groundwater supply; and WHEREAS, the San Pasqual Basin is located within the City's water service area and the City is the primary landowner in the San Pasqual Valley; and WHEREAS, Council Policy 600-45 directs the City to prepare a Groundwater Management Plan for the San Pasqual Basin which shall include an evaluation of how best to effectively protect,

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manage, and utilize the water resources of the San Pasqual Valley; and WHEREAS, California Water Code sections 10750 through 10755.4 set forth the procedure by which a local agency such as the City may adopt and implement a groundwater management plan; and WHEREAS, after publication of notice pursuant to Government Code section 6066, and prior to adopting this Resolution of Intention, the City held a hearing on whether to adopt this Resolution of Intention to Draft a Groundwater Management Plan for the Purposes of Implementing the Plan and Establishing a Groundwater Management Program and Statement of Public Participation; NOW, THEREFORE, BE IT RESOLVED, by the Council of the City of San Diego, as follows:

1. That the City intends to draft a Groundwater Management Plan for the San Pasqual Basin [Plan] pursuant to California Water Code sections 10750 through 10755.4 for the purposes of implementing the plan and establishing a groundwater management program. 2. That the Plan shall include the following components: a. Basin management objectives; b. Components relating to the monitoring and management of groundwater levels, groundwater quality degradation, inelastic land surface subsidence, and changes in surface flow and surface water quality that directly affect groundwater levels or quality or are caused by groundwater pumping; c. Monitoring protocols designed to detect changes in groundwater levels, groundwater quality, inelastic land surface subsidence if subsidence is identified as a potential problem, and flow and quality of surface water that directly affect groundwater levels or quality or are caused by groundwater pumping. The monitoring protocols shall be designed to generate information that promotes efficient and effective groundwater management; d. A plan to involve other agencies that enables the City to work cooperatively with other public entities whose service area or boundary overlies the San Pasqual Basin; e. A map that details the area of the San Pasqual Basin, as defined in the Department of Water Resources Bulletin No. 118, and the area of the City that will be subject to the Plan, as well as the boundaries of other local agencies that overlie the San Pasqual Basin; and f. Rules related to implementation of the Plan. 3. That the City will provide for public participation in the development of the Plan, which shall include the following: a. The formation of a project advisory committee to guide development of the Plan; b. Preparation and implementation of a public outreach plan, including involving local agencies, water purveyors, land lessees, and well owners/users in the San Pasqual Valley; and c. A public review and comment period prior to the hearing on whether to adopt the Plan. 4. That this activity is a feasibility or planning study that is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines section 15262. For more information, contact the City of San Diego Water Department at (619) 533-4679. NCT 2012491
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City of San Diego

PUBLISHED: Friday December 22, 2006

City of San Diego
DEVELOPMENT SERVICES
DEPARTMENT
Date of Notice: 12/22/06
PUBLIC NOTICE OF A
DRAFT NEGATIVE DECLARATION
JO: 42-3456

The City of San Diego Land Development Review Division has prepared a draft Negative Declaration for the following project and is inviting your comments regarding the adequacy of the document. Your comments must be received by January 10, 2007 to be included in the final document considered by the decision-making authorities. Please send your written comments to the following address: James Arnhart, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or e-mail your comments to JArnhart@sanidiego.gov with the Project Number (51161) in the subject line.

General Project Information:

- *Project No. 51161, SCH No. N/A
- *Community Plan Area: Peninsula
- *Council District: 2

Subject: McKinnon Residence: A COASTAL DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, EASEMENT ABANDONMENT and DEVIATION to demolish an existing one-story, single-family residence and construct a two-story, two-bedroom, single-family residence (approximately 11,043 square feet) with basement and attached two-car garage on a previously developed 1.46 acre lot containing Environmentally Sensitive Lands. The project site is located in the RS-1-4 (Residential-Single-Unit) zone within the Coastal Overlay Zone (Appealable), Coastal Height Limitation Overlay Zone and Peninsula Community Plan Area. Legal Description: A portion of Pueblo Lots 105, 106 and 107 of Miscellaneous Map No. 36 (APN 532-410-17). The site is not included on any Government Code Listing of hazardous waste sites.

Applicant: C & SD Construction

Recommended Finding: The City of San Diego has conducted an Initial Study which determined that the proposed project would not have potentially significant environmental effects. As such, neither mitigation nor an Environmental Impact Report is required.

Availability in Alternative Format: To request this Notice, the Negative Declaration, Initial Study, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact James

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Arnhart at (619) 446-5385. The draft Negative Declaration, Initial Study, and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. For information regarding public meetings/hearings on this project, contact Project Manager Cory Wilkinson at (619) 557-7900. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego web-site (<http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html>), and distributed on 12/22/06.

Robert J. Manis, Assistant Deputy Director Development Services Department
Pub. December 22-00017592

**City of San Diego
DEVELOPMENT SERVICES
DEPARTMENT
Date of Notice: December 22, 2006
PUBLIC NOTICE OF A
DRAFT MITIGATED NEGATIVE
DECLARATION
JO: 4556**

The City of San Diego Land Development Review Division has prepared a draft Mitigated Negative Declaration for the following project and is inviting your comments regarding the adequacy of the document. Your comments must be received by January 22, 2007 to be included in the final document considered by the decision-making authorities. Please send your written comments to the following address: Martha Blake, Senior Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or e-mail your comments to DSDEAS@sandiego.gov with Project Number 67993 in the subject line.

General Project Information:

*Project No. 67993/SCH No. Pending

*Community Plan Area: Tierrasanta

*Council District: 7

Subject: Tucker Self Storage: PUBLIC RIGHT-OF-WAY VACATION, COMMUNITY PLAN AMENDMENT (CPA), REZONE, PLANNED DEVELOPMENT PERMIT (PDP), AND SITE DEVELOPMENT PERMIT (SDP) to create two parcels from one existing, 3.35-acre site for a 120,183 square-foot of self storage building at 9765 Clairemont Mesa Boulevard. The site is in the RS-1-1, IL-2-1, IH-2-1 and the Airport Environs Overlay Zones, within the Tierrasanta Community Plan area. The project entails a 55-year ground lease of the property pursuant to the Settlement Agreement in the case of TRP LIMITED V. CITY OF SAN DIEGO, ET AL, SCC No. 578191, approved by City Council Resolution No. 274804 on December 4, 1989. Legal Description: Parcel A and B of Lot 2, of Map No. 825. Council District 7. Applicant: Jerry Tucker and Andy Krutzsch. The site is not included on a Government Code Listing of hazardous waste sites.

Applicant: Tucker Self Storage.

Recommended Finding: The recommended finding that the project will not have a significant effect on the environment is based on an Initial Study and project revisions/conditions which now mitigate potentially significant environmental impacts in the following area(s): Biological Resources, Paleontological Resources, and Public Health and Safety.

Availability in Alternative Format: To request this Notice, the Mitigated Negative Declaration, Initial Study, and/or supporting documents in alternative format, call the Development Services Department at (619) 446-5000 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Martha Blake at (619) 446-5375. The draft Mitigated Negative Declaration, Initial Study, and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. For information regarding public meetings/hearings on this project, contact Project Manager Patricia Grabski at (619) 446-5277. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego web-site (<http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html>), and distributed on December 22, 2006.

Robert J. Manis, Assistant Deputy Director Development Services Department
Pub. Dec 22-00017587

**City of San Diego
DEVELOPMENT SERVICES**

DEPARTMENT
Date of Notice: December 22, 2006
PUBLIC NOTICE OF A
DRAFT MITIGATED NEGATIVE
DECLARATION
JO: 42-5236

The City of San Diego Land Development Review Division has prepared a draft Mitigated Negative Declaration for the following project and is inviting your comments regarding the adequacy of the document. Your comments must be submitted by January 10, 2007 to be included in the final document considered by the decision-making authorities. Please send your written comments to the following address: Jerry Jakubauskas, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or e-mail your comments to jjakubauskas@sandiego.gov.

General Project Information:

*Project No. 83705, SCH No. N/A
 *Community Plan Area: College Area
 *Council District: 7 (Madaffer)

Subject: Aztec Budget Inn Redevelopment. SITE DEVELOPMENT PERMIT / VESTING TENTATIVE MAP / SEWER EASEMENT ABANDONMENT / REZONE to allow for the demolition of an existing vacant one-story 45-unit motel and two-story 10-unit apartment building; construction of a four-story mixed-use structure containing a combined total of 65 one-, two- and three-bedroom units (to include 7 affordable units) and 3,000 square-feet of commercial retail space; a 16-space street-level covered parking garage; a 111-space subterranean parking structure; abandon an existing onsite sewer easement; and rezone a 30,991 square-foot portion of a 0.94 acre site from RM-3-8 to RM-3-9. The project site is located at 6050 El Cajon Boulevard and 4620 Soria Drive, between 60th Street and College Avenue, in the CU-2-4 and RM-3-8 zones of the Central Urbanized Planned District, within the College Area community planning area, and in the Crossroads Redevelopment area (Lots 5, 6, 12, 13 and portions of Lot 7 in Block 7 of El Retiro, Map No. 1996).
Applicant: AMCAL, Multi-Housing, Inc.

Recommended Finding: The recommended finding that the project will not have a significant effect on the environment is based on an Initial Study and project revisions/conditions which now mitigate potentially significant environmental impacts in the following area(s): Air Quality, Noise, Historical Resources (Archeological), Paleontological Resources, and Traffic Circulation.

Availability in Alternative Format: To request this Notice, the Mitigated Negative Declaration, Initial Study, and/or supporting documents in alternative format, call the Development Services Department at (619)446-5460 or (800)735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Kenneth Teasley at (619)446-5390. The draft Mitigated Negative Declaration, Initial Study, and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. For information regarding public meetings/hearings on this project, contact Project Manager Dan Stricker at (619)446-5251. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego web-site (<http://clerkdoc.sannet.gov/Website/publicnotice/publicnoticeqa.html>), and distributed on December 22, 2006. Robert Manis, Assistant Deputy Director Development Services Department
 Pub. December 22-00017589

City of San Diego
DEVELOPMENT SERVICES
DEPARTMENT
Date of Notice: December 22, 2006
PUBLIC NOTICE OF A
DRAFT MITIGATED NEGATIVE
DECLARATION
Job Order: 426280

The City of San Diego Land Development Review Division has prepared a draft Mitigated Negative Declaration for the following project and is inviting your comments regarding the adequacy of the document. Your comments must be submitted by January 12, 2007 to be included in the final document considered by the decision-making authorities. Please send your written comments to the following

address: Kristen Forburger, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or e-mail your comments to DSDEAS@sandiego.gov with the Project Number in the subject line.

General Project Information:

*Project No 99730 SCH No. N/A

*Community Plan Area: College Area Community Plan

*Council District: 7

Subject: Grant Residence: NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) to allow for slope repair which would include the construction of a tied-back retaining wall on Environmentally Sensitive Lands (ESL) with an existing single family residence. The 0.2-acre project site is located at 6852 Julie Street within the College Area Community Plan area. (Lot 7, Dennstedt Point Unit Number Three, Map Number: 2930)

Applicant: Applicant: Richard J. Grant

Recommended Finding: The recommended finding that the project will not have a significant effect on the environment is based on an Initial Study and project revisions/conditions which now mitigate potentially significant environmental impacts in the following area(s): Land Use (MHPA Land Use Adjacency).

Availability in Alternative Format: To request this Notice, the Mitigated Negative Declaration, Initial Study, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5000 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Kristen Forburger at (619) 446-5344. The draft Mitigated Negative Declaration, Initial Study, and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. For information regarding public meetings/hearings on this project, contact Project Manager Jeff Rhobles at (619) 446-5225. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego web-site (<http://clerkdoc.sannet.gov/Website/publicnotice/publicnoticeqa.html>), and distributed on December 22, 2006

Robert J. Manis, Assistant Deputy Director Development Services Department
Pub. December 22-00017593

**The City of San Diego
RELOUTION NUMBER R-301974**

A RESOLUTION OF INTENTION TO DRAFT A GROUNDWATER MANAGEMENT PLAN FOR THE SAN PASQUAL BASIN FOR THE PURPOSES OF IMPLEMENTING THE PLAN AND ESTABLISHING A GROUNDWATER MANAGEMENT PROGRAM AND STATEMENT OF PUBLIC PARTICIPATION

WHEREAS, the City of San Diego [City] has provided water service since 1901 and currently serves more than 1.3 million people populating more than 200 square miles of developed land; and

WHEREAS, in 2002, the City adopted the Long-Range Water Resources Plan [LRWRP] which evaluated different water supply alternatives for meeting the City's current and future water needs; and

WHEREAS, the LRWRP identifies the San Pasqual Basin located in the San Pasqual Valley as a potential source of groundwater supply; and

WHEREAS, the San Pasqual Basin is located within the City's water service area and the City is the primary landowner in the San Pasqual Valley; and

WHEREAS, Council Policy 600-45 directs the City to prepare a Groundwater Management Plan for the San Pasqual Basin which shall include an evaluation of how best to effectively protect, manage, and utilize the water resources of the San Pasqual Valley; and

WHEREAS, California Water Code sections 10750 through 10755.4 set forth the procedure by which a local agency such as the City may adopt and implement a groundwater management plan; and

WHEREAS, after publication of notice pursuant to Government Code section 6066, and prior to adopting this Resolution of Intention, the City held a hearing on whether to adopt this Resolution of Intention to Draft a Groundwater Management Plan for the Purposes of Implementing the Plan and Establishing a Groundwater Management Program and Statement of Public Participation;

NOW, THEREFORE, BE IT RESOLVED, by the Council of the City of San Diego, as follows:

1. That the City intends to draft a Groundwater Management Plan for the San Pasqual Basin [Plan] pursuant to California Water Code sections 10750 through 10755.4 for the purposes of implementing the plan and establishing a groundwater

management program.

2. That the Plan shall include the following components:

- a. Basin management objectives;
- b. Components relating to the monitoring and management of groundwater levels, groundwater quality degradation, inelastic land surface subsidence, and changes in surface flow and surface water quality that directly affect groundwater levels or quality or are caused by groundwater pumping;
- c. Monitoring protocols designed to detect changes in groundwater levels, groundwater quality, inelastic land surface subsidence if subsidence is identified as a potential problem, and flow and quality of surface water that directly affect groundwater levels or quality or are caused by groundwater pumping. The monitoring protocols shall be designed to generate information that promotes efficient and effective groundwater management;
- d. A plan to involve other agencies that enables the City to work cooperatively with other public entities whose service area or boundary overlies the San Pasqual Basin;
- e. A map that details the area of the San Pasqual Basin, as defined in the Department of Water Resources Bulletin No. 118, and the area of the City that will be subject to the Plan, as well as the boundaries of other local agencies that overlie the San Pasqual Basin; and
- f. Rules related to implementation of the Plan.

3. That the City will provide for public participation in the development of the Plan, which shall include the following:

- a. The formation of a project advisory committee to guide development of the Plan;
- b. Preparation and implementation of a public outreach plan, including involving local agencies, water purveyors, land lessees, and well owners/ users in the San Pasqual Valley; and
- c. A public review and comment period prior to the hearing on whether to adopt the Plan.

4. That this activity is a feasibility or planning study that is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines section 15262.

For more information, contact the City of San Diego Water Department at (619) 533-4679.

Pub. Dec. 22-00017590

City of San Diego

PUBLISHED: Friday December 22, 2006

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Appendix I

Standard Operating Procedures for Collecting Field Data

**STANDARD OPERATING PROCEDURE
FOR WATER SAMPLING AND FIELD MEASUREMENTS**

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1.0 INTRODUCTION

This guideline is a general reference for the proper equipment and techniques for groundwater sampling. The purpose of these procedures is to enable the user to collect representative and defensible groundwater samples and to facilitate planning of the field sampling effort. These techniques should be followed whenever applicable, although site-specific conditions or project-specific plans may require adjustments in methodology.

To be valid, a groundwater sample must be representative of the particular zone of the water being sampled. The physical, chemical, and bacteriological integrity of the sample must be maintained from the time of collection to the time of analysis in order to minimize changes in water quality parameters. Acceptable equipment for withdrawing samples from completed wells include bailers and various types of pumps. The primary considerations in obtaining a representative sample of the groundwater are to avoid collecting stagnant (standing) water in the well, to avoid physically or chemically altering the water due to improper sampling techniques, sample handling, or transport, and to document that proper sampling procedures have been followed.

This guideline describes suggested well evacuation methods, sample collection and handling, field measurement, decontamination, and documentation procedures. Examples of sampling and chain-of-custody (COC) forms are attached.

2.0 DEFINITIONS

Annular Space: The space between casing or well screen and the wall of the drilled hole, or between drill pipe and casing, or between two separate strings of casing. Also called annulus.

Aquifer: A geologic formation, group of formations, or part of a formation that is capable of yielding a significant amount of water to a well or spring.

Bailer: A long narrow tubular device with an open top and a check valve at the bottom that is used to remove water from a well during purging or sampling. Bailers may be made of Teflon, polyvinyl chloride (PVC), or stainless steel. Disposable bailers are available and are made of polycarbonate.

Bladder Pump: A pump consisting of flexible bladder usually made of Teflon contained within a rigid cylindrical body (commonly made of PVC). The lower end of the bladder is connected through a check valve to the intake port, while the upper end is connected to a sampling line that leads to the ground surface. A second line, the gas line, leads from the ground surface to the annular space between the bladder and the outer body of the pump. After filling, under hydrostatic pressure, application of gas pressure causes the bladder to collapse, closing the check valve and forcing the sample to ground surface through the sample line. Gas pressure is often provided by a compressed air tank, and commercial models generally include a control box that automatically switches the gas pressure off and on at appropriate intervals.

Centrifugal Pump: A pump that moves a liquid by accelerating it radially outward in an impeller to a surrounding spiral-shaped casing.

Chain of Custody: Method for documenting the history and possession of a sample from the time of its collection through its analysis and data reporting to its final disposition.

Check Valve: Ball and spring valves on core barrels, bailers, and sampling devices that are used to allow water to flow in one direction only.

Conductivity (electrical): A measure of the quantity of electricity transferred across a unit area, per unit potential gradient, per unit time. It is the reciprocal of resistivity.

Datum: An arbitrary surface (or plane) used in the measurement of heads (i.e., National Geodetic Vertical Datum [NGVD], commonly referred to as mean sea level [msl]).

Decontamination: A variety of processes used to clean equipment that contacted formation material or groundwater that is known to be or suspected of being contaminated.

Downgradient: In the direction of decreasing hydrostatic head.

Drawdown: The lowering of the potentiometric or piezometric surface in a well and aquifer due to the discharge of water from the well.

Electric Submersible Pump: A pump that consists of a rotor contained within a chamber and driven by an electric motor. The entire device is lowered into the well with the electrical cable

and discharge tubing attached. A portable power source and control box remain at the surface. Electrical submersible pumps used for groundwater sampling are constructed of inert materials such as stainless steel, and are well sealed to prevent sample contamination by lubricants.

Filter Pack: Sand or gravel that is generally uniform, clean, and well rounded that is placed in the annulus of the well between the borehole wall and the well screen to prevent formation material from entering through the well screen and to stabilize the adjacent formation.

Headspace: The empty volume in a sample container between the water level and the cap.

HydroPunch: An in situ groundwater sampling system in which a hollow steel rod is driven into the saturated zone and a groundwater sample is collected.

In Situ: In the natural or original position; in place.

Monitoring Well: A well that is constructed by one of a variety of techniques for the purpose of extracting groundwater for physical, chemical, or biological testing, or for measuring water levels.

Packer: A transient or dedicated device placed in a well or borehole that isolates or seals a portion of the well, well annulus, or borehole at a specific level.

Peristaltic Pump: A low-volume suction pump. The compression of a flexible tube by a rotor results in the development of suction.

pH: A measure of the acidity or alkalinity of a solution, numerically equal to 7 for neutral solutions, increasing with increasing alkalinity and decreasing with increasing acidity. (Original designation for potential of hydrogen.)

Piezometer: An instrument used to measure head at a point in the subsurface; a nonpumping well, generally of small diameter, that is used to measure the elevation of the water table or potentiometric surface.

Preservative: An additive (usually an acid or a base) used to protect a sample against decay or spoilage, or to extend the holding time for a sample.

Static Water Level: The elevation of the top of a column of water in a monitoring well or piezometer that is not influenced by pumping or conditions related to well installation, hydrologic testing, or nearby pumpage.

Turbidity: Cloudiness in water due to suspended and colloidal organic and inorganic material.

Upgradient: In the direction of increasing static head.

3.0 RESPONSIBILITIES

Project Manager: Selects site-specific water sampling methods, locations for monitoring well installations, monitoring wells to be sampled and analytes to be analyzed with input from the field team leader (FTL) and project geologist. Responsible for project quality control and field audits.

Field Team Leader: Implements water sampling program. Supervises project geologist/hydrogeologist and sampling technician. Insures that proper chain-of-custody procedures are observed and that samples are sampled, transported, packaged, and shipped in a correct and timely manner.

Project Geologist/Hydrogeologist: Insures proper collection, documentation, and storage of groundwater samples prior to shipment to the laboratory. Assists in packaging and shipment of samples.

Field Sampling Technician: Assists the project geologist/hydrogeologist in the completion of tasks and is responsible for the proper use, decontamination, and maintenance of groundwater sampling equipment.

4.0 WATER SAMPLING GUIDELINES

4.1 WELL EVACUATION AND SAMPLING EQUIPMENT

There are many methods available for well purging. A variety of issues must be considered when choosing evacuation and sample collection equipment including: the depth and diameter of the well, the recharge capacity of the well, and the analytical parameters that will be tested. Few sampling devices are suitable for the complete range of groundwater parameters. For example,

an open bailer is acceptable for collecting major ion and trace metal samples, but it may lead to erroneous analytical results if used for the collection of samples that are analyzed for volatile organics, dissolved gases, or even pH. Generally, the best pumps to use are positive displacement pumps, such as bladder and helical rotor pumps that minimize the aeration of the groundwater as it is sampled, and therefore yield the most representative groundwater samples. Although it is possible to use different equipment to evacuate the well and to sample the well, this is not recommended because of the increased decontamination requirements and possibilities for cross contamination. It is recommended that a flow rate as close to the actual groundwater flow rate should be employed to avoid further development, well damage, or the disturbance of accumulated corrosion or reaction products in the well (Puls and Barcelona, 1989).

Positive displacement pumps, such as bladder pumps, are generally recommended for both well evacuation and sample collection. Other types of sample collection, such as bailing or the use of gas lift pumps, should be avoided, especially when analyzing for sensitive parameters because of the geochemical changes that can occur due to the aeration of the water within the well. Also, the use of these sample devices may entrain suspended materials, such as fine clays and colloids which are not representative of mobile chemical constituents in the formation of interest (Puls and Barcelona, 1989).

Specific instructions for the use of several of the sampling devices are discussed in the next sections. All purging and sampling equipment should be decontaminated before beginning work and between wells in accordance with Section 4.4.

Bailers. Bailers represent the simplest and least expensive method of collecting the sample from a well. However, they may not be suitable for all analyses. For most applications, the bailer should be constructed of Teflon or stainless steel. Disposable bailers constructed of polyethylene may also be acceptable for some applications (e.g., sampling for petroleum hydrocarbons), and they represent a simple method of avoiding cross-contamination between samples without the time-consuming need for decontamination. The following issues should be considered when using bailers for sampling:

Bailers should be decontaminated per Section 4.4 of these guidelines and then isolated from any type of contamination prior to use for purging or sampling. The bailer should be decontaminated prior to the first well and between each subsequent well.

Stainless steel or Teflon-coated stainless steel wire is recommended for lowering and retrieving the bailer from the well. At no time should the bailer or the line touch the ground during the sampling process. This can be done by coiling the line in a bucket or on a sheet of polyethylene. Polypropylene line may be substituted for the stainless steel wire, but should be discarded after each use.

When lowering the bailer into the well, care should be taken to minimize agitation in the well, such as when the bailer contacts the water-table surface.

Peristaltic/Centrifugal Pumps. Peristaltic and centrifugal pumps are widely used for purging of wells with water levels close to the surface (less than 30 feet). They are reasonably portable, light, and easily adaptable to ground-level monitoring of field parameters by attaching a flow-through cell. These pumps require minimal downhole equipment, and they can easily be cleaned in the field, or the entire tubing assembly can be changed for each well. The following procedures should be considered when using these pumps:

Prior to use, the exterior and interior of all intake tubing for use with the peristaltic/centrifugal pump should be thoroughly flushed with tap water and then double rinsed with distilled water. New tubing should be used at each well and then discarded. If a gas-powered generator is used, it should be downwind of the well.

The intake of the suction tubing should be lowered to the midpoint of the well screen. Alternatives to this procedure may be necessary if the drawdown from the purging operations causes the water level to fall and begin to pump air. The suction line should be lowered slowly into the well until it pumps water continuously but not lower than 1 foot above the bottom of the well.

If parameters are to be monitored continuously, connect the instrumentation header to the pump discharge and begin flushing the well. Continuously monitor the parameters (pH, Eh, temperature, and specific conductivity) and measure the volume of groundwater being pumped. Alternately, parameters may be monitored in a beaker filled from the pump discharge.

After purging, remove the intake tubing from the well while the pump is still pumping to prevent backwash of water into the well. Stop the pump and disconnect the tubing from the pump for cleaning or disposal.

If tubing is to be reused (not recommended), clean the interior of the tubing by flushing thoroughly with tap water. Double rinse the tubing with distilled water. Using Alconox and water, wash the exterior of the tubing, and then rinse with tap water and distilled water.

Gas-Lift Pumps. A pressure displacement system consists of a chamber equipped with a gas inlet line, a water discharge line and two check valves. When the chamber is lowered into the casing, water floods it from the bottom through the check valve. Once full, a gas (e.g., nitrogen or air) is forced into the top of the chamber in sufficient amounts to displace the water out the discharge tube. The check valve in the bottom prevents water from being forced back into the casing, and the upper check valve prevents water from flowing back into the chamber when the gas pressure is released. This cycle can be repeated as necessary until purging is complete. The pressure lift system is particularly useful when the well depth is beyond the capability of a peristaltic or centrifugal pump. The water is displaced up the discharge tube by the increased gas pressure above the water level. The potential for increased gas diffusion into the water makes this system unsuitable for sampling volatile organic or most pH critical parameters. The entire pump assembly and tubing should be decontaminated before beginning purging and between wells as described in Section 4.4. The following procedures should be considered when using these pumps:

- Determine depth to midpoint of screen or depth to well section open to the aquifer (consult driller's or well completion log).
- Lower displacement chamber until top is just below water level.
- Attach gas supply line to pressure adjustment valve on cap.
- Gradually increase gas pressure to maintain discharge flow rate.
- Measure rate of discharge frequently. A bucket and stopwatch are usually sufficient.
- Purge a minimum of five casing volumes or until discharge characteristics stabilize (see discussion on well purging).

Submersible Pumps. Submersible pumps take in water and push the sample up a sample tube to the surface. The power sources for these pumps may be compressed gas or electricity. The operation principles vary, and the displacement of the sample can be by an inflatable bladder, sliding piston, gas bubble, or impeller. Bladder or helical rotor pumps are recommended for sampling for sensitive parameters. Pumps are available for 2-inch-diameter wells and larger, and these pumps can lift water up to several hundred feet. The entire pump assembly and tubing should be decontaminated before beginning purging and between wells as described in Section 4.4.

Limitations of this class of pumps include:

- They may have low delivery rates.
- Many models of these pumps are expensive.
- Compressed gas or electricity is needed.
- Sediment in water may cause clogging of the valves or eroding the impellers with some of these pumps.
- Decontamination of internal components of some types is difficult and time consuming.

Advantages of this class of pumps include:

- Delivery of low turbidity samples.
- Adjustable to very low flow rates.

Some types (e.g., bladder pumps) are relatively inexpensive and easy to install as dedicated systems.

Some types (e.g., bladder pumps) can be easily disassembled for decontamination.

HydroPunch® Groundwater Sampling System. The HydroPunch® provides in situ groundwater samples by using a specially designed sample tool to provide a hydraulic connection with the adjacent water table. Both groundwater and floating layer hydrocarbons may be sampled using the HydroPunch®. These are two types of HydroPunch® available for use today: HydroPunch I and HydroPunch II. The main difference between the original system (HydroPunch I) and the HydroPunch II is in the amount of groundwater that can be extracted from the formation using each of the methods. The HydroPunch I allows for only one sample of very low volume to be collected while the HydroPunch II allows for the withdrawal of as much groundwater as is required for the analyses being conducted.

In the HydroPunch I Groundwater Sampling System, the sample tool is pushed to the proper zone (at least 5 feet of submergence for groundwater sampling) and then withdrawn to expose an inlet screen. The interior of the sample tool fills with water. When the HydroPunch is recovered, check valves keep the sample from draining. Discharge to sample containers is accomplished through a stopcock.

The HydroPunch II utilizes the same type of system to collect groundwater samples except this sampler is lowered and pushed into the groundwater on hollow push rods. A 1-inch-diameter stainless steel bailer is then lowered down the hollow push rods and into the exposed screened interval of the HydroPunch II. The bailer can be lowered to the water table as many times as are required to obtain a sufficient volume of water for analyses.

Both systems may be pushed through as much as 60 feet of soft sediments to collect groundwater samples. In coarse sand, gravel, consolidated rock, or at depths greater than 60 feet, a pilot hole must be drilled prior to driving the HydroPunch® into the saturated zone.

Advantages of this system include low cost, the ability to collect a relatively undisturbed in situ groundwater sample, and the relative speed with which a sample can be collected when compared to drilling, installing, developing, purging, and sampling a monitoring well. Disadvantages are that an accurate water level can not be obtained using the HydroPunch®,

sampling cannot be repeated if problems occur with the samples after they are collected, and it does not allow for long-term groundwater monitoring.

The HydroPunch® is ideal for screening for contaminants or defining a contaminant plume when resources are not available to install a large number of monitoring wells.

4.2 WELL EVACUATION METHODS

4.2.1 Purging Requirements

To obtain a representative groundwater sample it must be understood that the composition of the water within the well casing and in close proximity to the well is probably not representative of the overall groundwater quality in the target aquifer. This is due to the possible presence of drilling materials near the well and because important environmental conditions such as the oxidation-reduction (redox) potential may differ drastically near the well from the conditions in the surrounding water-bearing materials. For these reasons it is necessary to pump or bail the well until it is thoroughly flushed of standing water and contains fresh water from the aquifer. The recommended amount of purging before sampling is dependent on many factors including the characteristics of the well, the hydrogeological nature of the aquifer, the type of sampling equipment being used, and the parameters that are to be analyzed.

The number of casing volumes that should be removed prior to sample collection has been a matter of debate in the groundwater community for some time. The consensus seems to be that rather than relying on the removal of a specific volume of water (such as five casing volumes) prior to sample collection, physical parameters such as pH, specific conductivity, temperature, and possibly redox potential should be used to evaluate when enough water has been removed from the well to obtain a representative groundwater sample. However, it is recommended that where possible, a minimum of five casing volumes should be purged prior to sampling. The sensitivity of the above parameters to changes as a result of exposure of groundwater to surface level conditions (i.e., changes in the partial pressure of dissolved gases or the conditions of the purging system) make in situ monitoring desirable. An alternative to this would be to conduct these measurements in a closed cell attached to the discharge side of the pump system. Puls and Barcelona (1989) suggest that an initial estimate for the time of pumping necessary to collect representative water from a formation is around two times the time required to get plateau values for the above parameters. For example, the parameters may be considered stable when several

consecutive measurements (collected at least one-half a casing volume apart) do not change by more than the following:

Conductivity	±10 percent
pH	±0.4 units
Temperature	±2°C

When evacuating low yield wells (wells that are incapable of yielding at least five casing volumes), the well should be evacuated to dryness once (USEPA, 1986). As soon as the well recovers sufficiently, the samples should be collected and containerized in the order of the parameter volatilization sensitivity. The samples should be retested for field parameters after sampling as a check on the stability of the water samples over time. Whenever full recovery exceeds 2 hours, the sample should be collected as soon as sufficient volume is available for a sample for each parameter. However, allowing a well to recover overnight is not acceptable. At no time should the well be pumped to dryness if the recharge rate causes the formation water to vigorously cascade down the sides of the screen and cause an accelerated loss of volatiles. In this case, samples should be collected at a rate slow enough to maintain the water level at or above the top of the screen to prevent cascading.

Other factors that will influence the amount of purging required before sampling include the pumping rate and the placement of the pumping equipment within the column of water in the well. For example, recent studies have shown that if a pump is lowered immediately to the bottom of a well before pumping, it may take some time for the column of water above it to be exchanged if the transmissivity of the aquifer is high and the well screen is at the bottom of the casing. In these cases, the pump will be drawing water primarily from the aquifer. Purging from higher in the well or just below the water surface provides a more complete removal of the casing water.

4.2.2 Calculation of Casing Volume

To insure that an adequate volume of water has been removed from the well prior to sampling, it is first necessary to determine the volume of standing water in the well and the volume of water in the filter pack below the well seal. The volume can be easily calculated by the following method (calculations should be entered in the field logbook):

1. Obtain all available information on well construction (e.g., location, casing, screen, depth).
2. Determine well or casing diameter.

3. Measure and record static water level (depth below ground level or top of casing reference point) using one of the methods described in Section 2.3.1.
4. Determine depth of well by sounding using a clean, decontaminated weighted tape measure or an electronic water-level probe.
5. Calculate the volume of water in the casing using the following formula:

$$V = 7.481 (_r^2h)$$

Where: V = Casing Volume (gal)
 r = Well radius (ft) = well diameter (ft)/2
 h = Linear feet of water in well = total well depth (ft) - static water depth (ft)

Alternatively, the casing volume can be calculated by multiplying the linear feet of water in the well by the volume per linear feet taken from Attachment 1 or other similar tables. Always be sure that the units in your calculation are consistent. In the equation above, 7.481 is the conversion factor from cubic feet to gallons.

4.2.3 Calculation of Annulus Volume

Some groundwater sampling protocol require the evacuation of casing and annulus volumes prior to sampling. In these cases the volume of water contained in the annular space between the casing and the borehole wall is calculated by the following formula:

$$V^c = (C_b - C_c) \times (h) \times (0.30)$$

Where:
 C_b = Borehole Capacity (Volume in Gal./ft)
 C_c = Casing Capacity (Volume in Gal./ft)
 h = Amount of standing water in the well
 0.30 = Average porosity of typical sand pack

The annulus volume is added to the casing volume prior to multiplying by the number of volumes to be excavated.

4.2.4 Purge Water Handling and Disposal

Because of the potential for spreading environmental contamination, planning for purge water disposal is a necessary part of well monitoring. Alternatives range from releasing it on the ground (not back down the well) to full containment, treatment, and disposal. If the well is believed to be contaminated, the best practice is to contain the purge water and store it in drums labeled "purge water" or in aboveground portable storage tanks (i.e., "Baker Tanks") until the water samples have been analyzed. Once the contaminants are identified, appropriate treatment or disposal requirements can be determined.

4.3 SAMPLE COLLECTION METHODS

All groundwater samples should be collected using a clean, dry decontaminated bailer made of either stainless steel or Teflon unless a HydroPunch® groundwater system is being used.

4.3.1 Sample Containers

A complete set of sample containers should be prepared by the laboratory prior to going into the field. The laboratory should provide the proper containers with the required preservatives. The laboratory's QA manual should provide a complete description of the procedures used to clean and prepare the containers. The containers should be labeled in the field with the date, well designation, project name, collectors' name, time of collection, and parameters to be analyzed. The sample containers should be kept in a cooler (at 4°C) until they are needed (i.e., not left in the sun during purging). One cooler should be used to store the unfilled bottles and another to store the samples.

The sample bottles will be filled in order of the volatility of the analytes so that the containers for volatile organics will be filled first, and samples that are not pH-sensitive or subject to loss through volatilization will be collected last. A preferred collection order (as listed in USEPA, 1986) is as follows:

- Volatile organics (VOCs)
- Total petroleum hydrocarbons (TPH)
- Total organic halogens (TOX)
- Total organic carbon (TOC)
- Extractable organics (e.g., BNAs, pesticides, herbicides)
- Total metals
- Dissolved metals
- Phenols
- Cyanide

Sulfate and chloride
Turbidity
Nitrate and ammonia
Radionuclides

Temperature, pH, and specific conductance should be measured and recorded in the field before and after sample collection to check on the stability of the water samples over time.

4.3.2 Field Filtration for Dissolved Metals

Filtering groundwater samples has been a subject of considerable debate in recent years. In many cases, samples passing a 0.45 micron (μ m) filter were used to provide an indication of dissolved metals concentrations in groundwater. Puls and Barcelona (1989) report that the use of a 0.45 micron filter was not useful, appropriate, or reproducible in providing information on metals mobility in groundwater systems, nor was it appropriate for determination of truly "dissolved" constituents in groundwater. A dual sampling approach is recommended to collect both filtered and unfiltered samples.

Any filtration for estimates of dissolved species loads should be performed in the field with no air contact and immediate preservation and storage. In-line pressure filtration is best with as small a filter pore size as practically possible (e.g., 0.45, 0.10 micron). Disposable, in-line filters are recommended for convenience and avoiding cross-contamination. The filters should be pre-rinsed with distilled water; work by Jay (1985) showed that virtually all filters require pre-washing to avoid sample contamination.

In the absence of filters, sample turbidity can generally be reduced by using bladder pumps. USEPA (1986) recommends that the turbidity should be less than 5 nephelometric turbidity units (NTUs).

4.3.3 Sampling From Nonmonitoring Wells and Springs/Seeps

Municipal/Private Wells. Domestic water supply wells should be sampled in a similar manner to monitoring wells, although allowances must be made for the type of pumping equipment already installed in the well. The sampling point should be determined at the time of sampling, and it should be the cold-water tap as close to the pump as practical. Domestic supply samples should not be taken from taps delivering chlorinated, aerated, softened, or filtered water. Faucet aerators should be removed if possible before sampling. The water tap should be turned on and run for at least 30 minutes unless the water tap is directly adjacent to the well head, and then the water should be allowed to run for no less than 10 minutes before the samples are collected to flush stagnant water from the system. Prior to collecting the sample, reduce the flow rate to approximately 50 milliliters per minute (ml/min). All sample containers should be filled with water directly from the tap and the samples processed as described for monitoring well samples. Components of the plumbing system should be noted to assist in data interpretation.

Groundwater should be collected from water supply wells in a manner as consistent with the monitoring well sampling procedure as the circumstances permit. In most cases, this will involve sampling directly from the tap on each well and before the water has gone through any chlorination or treatment system.

Spring and Seep Sampling. Samples from springs or seeps should be collected directly into the sample bottles without using any special sampling equipment. The sample will be collected as close as possible to where the spring emanates from the soil or rock. The sampler should always stand downstream of the spring or seep to avoid disturbing sediment or clouding the water.

4.4 FIELD MEASUREMENTS

A variety of field measurements are commonly made during the sampling of groundwater including: water level, pH, conductivity, and temperature. The accuracy, precision, and usefulness of these measurements is dependent on the proper use and care of the field instruments. Valid and useful data can only be collected if consistent practices (in accordance with recommended manufacturers instructions) are followed. The instruments should be handled carefully at the well site and during transportation to the field and between sampling sites.

4.4.1 Water Level

Water levels can be measured by several techniques, but the same steps should be followed in each case. The proper sequence is as follows:

1. Check operation of measurement equipment aboveground. Prior to opening the well, don personal protective equipment as required.
2. *Record all information specified below on a sampling form or in the field notebook if a form is not available.*
3. Record well number, top of casing elevation, and surface elevation if available.
4. Measure and record static water level and total depth to the nearest 0.01 foot (0.3 cm) from the surveyed reference mark on the top edge of the inner well casing. If no reference mark is present, record in the log book where the measurement was taken from (i.e., from the north side of the inner casing).
5. Record the time and day of the measurement.

6. Some water-level measuring devices have marked metal or plastic bands clamped at intervals along the measuring line used for reference points to obtain depth measurements. The spacing and accuracy of these bands should be checked before each round of measurements because they may loosen and slide up or down the line, resulting in inaccurate reference points.

Electric Water Level Indicators. These devices consist of a spool of small-diameter cable or tape and a weighted probe attached to the end. When the probe comes in contact with the water, an electrical circuit is closed and a meter, light, and/or buzzer attached to the spool will signal the contact. This is the recommended method for obtaining accurate water-level measurements.

There are a number of commercial electric sounders available, none of which is entirely reliable under all conditions likely to occur in a contaminated monitoring well. In conditions where there is oil on the water, groundwater with high specific conductance, water cascading into the well, or a turbulent water surface in the well, measuring with an electric sounder may be difficult.

For accurate readings, the probe should be lowered slowly into the well. The electric tape is marked at the measuring point where contact with the water surface was indicated. The distance from the mark to the nearest tape bank is measured using a ruler or steel tape and added to the band reading to obtain the depth to water. Band spacing should be checked periodically as described above.

Chalked Steel Tape. Water level is measured by chalking a weighted steel tape and lowering it a known distance (to any convenient whole-foot mark) into the well or borehole. The water level is determined by subtracting the wetted chalked mark from the total length lowered into the hole.

The tape should be withdrawn quickly from the well because water has a tendency to rise up the chalk due to capillary action. A paste called "National Water Finder" may be used in place of chalk. The paste is spread on the tape the same way as the chalk but the part that gets wet turns red. This paste is manufactured by the Metal Hose and Tubing Company, Dover, New Jersey.

Disadvantages to this method include: depths are limited by the inconvenience of using heavier weights to properly tension longer tape lengths (typically, 100 foot tapes require a 10- to 12-pound weight to tension adequately); it is ineffective if borehole/well wall is wet or inflow is occurring above the static water level; chalking the tape is time consuming; and it is difficult to use in the rain. The water chemistry may also be modified somewhat by the addition of chalk or paste.

4.4.2 pH

The pH meters should be calibrated against two standard pH solutions, either 4 and 7 or 7 and 10, depending on whether previous pH measurements have been less than or greater than 7, respectively. The meter readings will be adjusted, and the probe should then be rinsed thoroughly with distilled water. The probe should then be immersed in the water sample, and the pH and temperature recorded in the field log or on the sampling form. The manufacturer's directions for calibration, maintenance, and use should be read and closely followed. Any problems with the functioning of the meter should be noted in the field log and reported to the office equipment manager.

4.4.3 Conductivity

Specific conductivity meters should be standardized by immersing a decontaminated specific conductivity probe into a standard solution of conductivity buffer. The conductivity of the standard solution should be within the same order of magnitude as anticipated for the water sample. The meter reading will be adjusted to the buffer solution value, and the probe will then be thoroughly rinsed with distilled water. The probe should then be immersed in the well water sample, and the conductivity value recorded. The manufacturer's directions for calibration, maintenance, and use should be read and closely followed. Calibrant solutions should be dated and discarded on their expiration date. Any problems with the functioning of the meter should be noted in the field log and reported to the office equipment manager.

4.4.4 Temperature

Temperature measurements should be made with either a mercury or electronic thermometer capable of accurately reading to 0.1°C. The temperature reading should be recorded in the field log or on the sampling form.

4.5 DECONTAMINATION

The general decontamination procedure for all non-dedicated groundwater sampling equipment (bailers, pumps, water-level probes) consists of the following steps:

1. Scrub and wash with laboratory-grade detergent (such as Alconox) and tap water;

2. Rinse with reagent-grade isopropanol alcohol or methanol and allow to air dry; and
3. Triple rinse with deionized water.

If available, a steam cleaner can also be used for decontaminating sampling equipment. Steam cleaning is the desired method since it does not introduce any additional chemicals into the system. If a steam cleaner is available it should be used instead of any other type of decontamination procedure. As with other procedures documented in this SOP, decontamination procedures may be determined by the client or regulatory agency involved in the project.

4.6 RECORDS AND DOCUMENTATION

4.6.1 Sample Designation

One suggested approach is to use the site name or an abbreviation or acronym of the site name to be the lead designator in the sample identification. For example, a sample from Hill Air Force Base Operable Unit 1 could be designated HAFB-OU1-2, with the final 2 designating the monitoring well number. Similarly, a spring sample may be designated with the site name HAFB-OU1-ZC, with the initials or name of the owner of the spring or name of the spring. Blind duplicate samples should be labeled with the number of a non-existent well. Equipment and trip blanks, collected when non-dedicated equipment is used, should also be labeled with a fictitious well name in a similar manner to the blind duplicate samples.

4.6.2 Sample Label

Sample containers should be labeled using water proof ink before a sample is obtained. A sample label should be affixed to all sample containers. This label identifies the sample by documenting the sample type, sampler(s) initials, sample location, time, date, analyses requested, and preservation method. A unique sample designation as discussed above is assigned to each sample collected. This sample ID is also noted on the sample label.

4.6.3 Field Notebooks and Sampling Forms

A field notebook should be prepared prior to beginning sampling activities and should be maintained throughout the sample round. The notebook should contain pertinent information

about the monitoring wells, such as depth of casing and water levels. During sampling, all the activities should be recorded on a groundwater sampling log (see Attachment 2) and in the field notebook. All forms used during sampling should be referenced in the field notebook. A brief description of weather conditions should also be noted as weather can sometimes affect samples. Any deviation from the sampling procedure described in the project work plan or SOP should be outlined in detail and justified in the field notebook. Specialized sampling forms can also be used to record the field measurements and other conditions observed.

4.6.4 Chain-of-Custody

The chain-of-custody form (Attachment 3) should be used to record the number of samples collected and the corresponding laboratory analyses. Information included on this form consists of time and date sampled, sample number, type of sample, sampler's name, preservatives used, and any special instructions. A complete and separate COC form should be completed for each cooler. A copy of the COC form should be retained by the sampler prior to shipment (forms with multiple carbon copies are recommended). The original COC form should accompany the sample to the laboratory and provide a "paper trail" to track the sample. When transferring the possession of samples, the individuals relinquishing and receiving the samples should sign, date, and note the time on the chain-of-custody form.

4.7 SAMPLE HANDLING AND SHIPPING

4.7.1 Sample Handling

The samples will be kept cool during collection and shipment with regular ice contained in a plastic bag or with frozen "blue ice." It is suggested that the blue ice be changed immediately before shipment to help assure the samples remain cool. The samples should be stored in an appropriately sized, durable ice chest. Over a 3-inch layer of packing materials, such as vermiculite or bubble packaging, the samples should be placed and kept separated, with the intervening voids filled with the packing material more than halfway to the top of the bottles or containers. Bottles should be placed upright. The ice should be placed above and about the top of the containers. The chain-of-custody record should be sealed in a "Ziplock" plastic bag and affixed to the inside of the top lid of the cooler. The remaining space should be filled with packing material. The cooler should be secured by completely wrapping with strapping tape

around both ends. If there is a drain on the cooler, it should be taped shut. Chain-of-custody seals should be affixed across the seal between the lid and body of the cooler.

4.7.2 Shipping Instructions

All samples should be shipped overnight delivery through a reliable commercial carrier, such as Federal Express, Emery, Purolator, or equivalent. If shipment requires more than a 24-hour period, sample holding times can be exceeded, or the samples may get warm compromising the integrity of the sample analysis. The sampler should call the laboratory to alert them when the samples will arrive on the following day:

5.0 REFERENCES

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- Puls, R.W. and M.S. Barcelona, 1989. Ground Water Sampling for Metals Analyses, Superfund Ground Water Issue, EPA/540/4-89/001, March 1989.
- U.S. Environmental Protection Agency (USEPA), 1986. RCRA Ground-Water Monitoring Technical Enforcement Guidance Document, OSWER-9950.1, September 1986.

6.0 ATTACHMENTS

- 1 - Volume of Schedule 40 PVC Pipe
- 2 - Groundwater Field Sampling Date Record
- 3 - Chain-of-Custody Record

**STANDARD OPERATING PROCEDURES
SAMPLE MANAGEMENT/PRESERVATION**

**STANDARD OPERATING PROCEDURES
FOR SAMPLE MANAGEMENT/PRESERVATION**

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1.0 INTRODUCTION

This guideline for sample management describes the requirements for sample identification, chain of custody (COC), sample handling, storage and shipping. The purpose of this SOP is to define sample management activities as performed from the time of sample collection to the time they are received by the laboratory.

2.0 DEFINITIONS

Sample: Physical evidence collected for environmental measuring and monitoring. For the purposes of this SOP, sample is restricted to solid, aqueous, air, or waste matrices. This SOP does not cover samples collected for lithologic description nor does it include remote sensing imagery or photographs. (Refer to SOPs for Field Documentation and Sample Management/Preservation.)

Field Team Leader: The individual responsible for the supervision of field work at the site during a given phase of investigation or monitoring.

Sampler: The individual who collects environmental samples during field work.

3.0 RESPONSIBILITIES

The following is a general description of responsibilities related to sample management; specific responsibilities are described in project work plans.

Program QC Coordinator: The program QC coordinator (QCC) is responsible for ensuring that client sample management requirements can be accommodated within Montgomery Watson quality requirements.

Project Manager: The project manager is responsible for ensuring that the requirements for sample management are included in the appropriate project plans. The project manager is responsible for fully communicating the sample management requirements to the Field Team Leader (FTL) by providing a copy of project plans or issuing written notice that the SOP is to be used exclusively.

Project QC Coordinator: The project QC coordinator is responsible for reviewing documentation developed from sample management to determine compliance with this SOP and project plan requirements.

Field Team Leader: The FTL is responsible for conducting the procedures described herein and, if applicable, the requirement of the project plan. Any variance from these procedures is considered a nonconformance, and written documentation is required, at a minimum, as described in the SOP for Corrective Action.

4.0 PROCEDURES

4.1 APPLICABILITY

These procedures apply to all work conducted for Montgomery Watson clients, by Montgomery Watson, or under the direction of Montgomery Watson. The information in this SOP may be incorporated into project-specific plans. Deviations or modifications to procedures not addressed in the project plans must be handled as a corrective action (see SOP for Corrective Action).

4.2 SAMPLE MANAGEMENT

4.2.1 Sample Containers

The sample containers to be used will be dependent on the sample matrix and analyses desired. Unless specified otherwise by the project plan, the containers to be used for various analyses are provided in Attachment 1 (EPA SW-846). Sample containers are to be filled (approximately 90 percent), with adequate headspace for safe handling upon opening, except containers for volatile organic compound (VOC) analyses, which are to be filled completely with no headspace. This applies to soil samples as well as water samples.

Once opened, the containers are to be used immediately. If the container has been received unsealed or is not used upon opening, it is to be recycled. If the container is used for any reason in the field (i.e., screening) and not sent to the laboratory for analysis, it should be discarded. The contents of the used container and the container itself may require disposal as a hazardous material. When storing before and after sampling, the containers must remain separate from

solvents. Sample containers with preservatives added by the laboratory should not be used if held for an extended period on the job site or exposed to extreme heat conditions.

4.2.2 Numbering and Labeling

Sample Label: A sample label, as shown in Attachment 2, will be affixed to all sample containers. Labels provided by the laboratory may be used if an example is included in the project plan. The sample label will be completed with the following information:

- Client name, project title, or project location (sufficiently specific for data management; e.g., Bayou Chemical Corp., East Suburbs Interceptor, Sawatch AFB)
- Sample location
- Sample identification number
- Date and time of sample collection
- Type of sample (grab or composite)
- Initials of sampler
- Preservative used
- Analyte(s) of interest
- Label number

If a sample is split with another party, identical labels will be attached to each sample container. After labeling, each sample will be refrigerated or placed in a cooler containing ice or "blue ice" to maintain the sample temperature of 4 degrees Celsius (°C).

Custody Seals: Custody seals, as shown in Attachment 3, will be used on each sample and/or shipping container to ensure custody. Custody seals used during the course of the project will consist of security tape with the date and initials of the sampler. As a minimum, one custody seal will be placed on the front of the cooler overlapping the strapping tape and one on the side of the cooler. If required by the client, a seal will be placed on each sample container so that it must be broken to gain access to the contents. Since VOC samples may be subject to contamination by the tape, VOC sample containers will first be secured in a "zip-lock" plastic bag. The plastic bag

will be sealed with a completed custody seal. If the seals are serially numbered, these numbers will be cross-referenced on both the field logbook and the COC form.

4.2.3 Chain of Custody

COC procedures require a written record of the possession of individual samples from the time of collection through laboratory analyses. A sample is considered to be in custody if it is:

- In a person's possession.
- In view after being in physical possession.
- In a secured condition after having been in physical custody.
- In a designated secure area, restricted to authorized personnel.

The COC record, as shown in Attachment 4, shall be used to document the samples taken and the analyses requested. A different COC record may be used if an example is included in the approved project plan. Information recorded by field personnel on the COC record includes the following:

- Client name
- Project name
- Project location
- Sampling location
- Signature of sampler(s)
- Sample identification number
- Date and time of collection
- Sample designation (grab or composite)
- Sample matrix
- Signature of individuals involved in custody transfer (including date and time of transfer)
- Airbill number (if appropriate)
- Number and type of bottles collected for each analysis
- Type of analysis and laboratory method number
- Any comments regarding individual samples (e.g., HNU readings, special instructions)

COC records will be placed in a plastic bag, secured to the lid of the cooler, and transported with the samples. When the sample(s) are transferred, the record is signed by both the receiving and relinquishing individuals. Signed airbills will serve as evidence of custody transfer between the field sampler and courier as well as courier and laboratory. If a carrier service is used to ship the samples (e.g., Federal Express), custody will remain with the sampler until it is relinquished to the laboratory. Copies of the COC record and airbill will be retained by the sampler. If the COC records are sequentially numbered, the record number and airbill number will be cross-referenced in both the field logbook and the sample register. If the COC record is not previously numbered, a tracking number of four digits or more should be added to the top of the form and recorded as above.

4.2.4 Sample Register/Sample Tracking

The sample register is a bound logbook with sequentially numbered pages used to document which samples were collected on a particular day. The sample register is also used as the key to correlate field samples with duplicate samples. Information that should be recorded in the sample register includes the following:

- Client name
- Project name and location
- Job number
- Date and time of collection
- Sample identification number
- Sample designation (grab or composite)
- Sample matrix
- Number and type of bottles
- Type of analysis
- Sample destination
- Sampler's initials

A sample tracking database, which includes the above information, may be substituted for a handwritten sample register. However, a hardcopy of each day's sampling activities should be maintained in the field files.

4.2.5 Sample Preservation/Storage

The requirements for sample preservation are dependent on the analyses desired and the sample matrix. Unless otherwise specified by the project plan, sample preservation requirements are provided in Attachment 1.

(Note: An important step in the sample management process is recording activities performed at each sampling location in the field logbook. This topic is discussed in the SOP for Field Documentation.)

4.2.6 Shipping

Procedures for packaging and transporting samples to the laboratory will be based on an estimation of contaminant concentrations in the samples to be shipped. Samples will be identified as either environmental, high concentration, geotechnical, or other samples. Environmental samples are defined as soil or water samples that are not saturated or mixed with product material. Those samples that are saturated in product or are free product samples are defined as high concentration samples.

4.2.6.1 Environmental Samples. Environmental samples will be shipped in the following manner:

Each sample will be placed in a separate plastic or "bubble-wrap" bag. As much air as possible is squeezed from the bag before sealing. Bags may be sealed with evidence tape for additional security. If brass or stainless steel tubes are used, bubble wrap is not required.

An ice chest (sturdy construction) is typically used as the shipping container. In preparation for shipping samples, the drain plug is taped shut from the outside and a large plastic bag is used as a liner for the cooler. Approximately 1 inch of packing material, such as vermiculite or bubble wrap, is placed in the bottom of the liner. Sufficient packing material should be used to prevent sample containers from making contact during shipment.

The bottles are placed in the lined ice chest. Cardboard or foam separators may be placed between the bottles at the discretion of the shipper.

Water samples for organic analysis and inorganic analysis will be cooled to 4°C with ice or "blue ice" during shipment. If ice is used, it will be contained such that the water will not fill the cooler as the ice melts. Dry ice should not be used as it has a tendency to freeze samples.

As described previously, the COC record will be placed inside a plastic bag, sealed, and taped to the inside of the cooler lid if a carrier (e.g., Federal Express or UPS) is used. If a carrier is used, the COC record should be placed in a pouch or plastic bag attached to the top of the cooler. The airbill will be filled out before the samples are handed over to the carrier. The laboratory will be notified if the shipper suspects that the sample contains any substance for which the laboratory personnel should take safety precautions.

The cooler is closed and taped shut with strapping tape (filament type) around both ends.

Two signed custody seals will be placed on the cooler, one on the front and one on the side overlapping strapping tape if possible. Additional seals may be used if the sampler and shipper think more seals are necessary. Wide clear tape will be placed over the seals to ensure against accidental breakage.

The cooler is handed over to the overnight carrier, typically a cargo-only air service. A standard airbill is necessary for shipping environmental samples.

4.2.6.2 High Concentration Samples. High concentration samples will be shipped as follows:

Each sample bottle is placed in a plastic bag, and the bag is sealed. Each VOC vial is wrapped in a paper towel, and the two vials are placed in one bag. As much air as possible is squeezed from the bag before sealing. Bags may be sealed with evidence tape for additional security.

Each bottle is placed in a separate paint can, the paint can is filled with vermiculite, and the lid is fixed to the can. The lid must be sealed with metal clips, filament, or evidence tape. If clips are used, the manufacturer typically recommends six clips. Arrows are placed on the can to indicate the upright position.

The outside of each can contains the proper Department of Transportation (DOT) shipping name and identification number for the sample. The information may be placed on stickers or printed legibly. A liquid sample of an uncertain nature will be shipped as a flammable liquid with the shipping name "FLAMMABLE Liquid N.O.S." and the identification number "UN1993." If the nature of the sample is known, Title 49, Code of Federal Regulations, Parts 171 to 177 (49 CFR 171-177) will be consulted to determine the proper labeling and packaging requirements. Typically carrier services are able to provide the above information.

The cans will be placed upright in a cooler that has had the drain plug taped shut inside and outside, and the cooler is lined with a large plastic bag. Approximately 1 inch of packing material, such as vermiculite, is placed in the bottom of the liner. Three sizes of paint cans are used: pint, half-gallon, and gallon. The pint or half-gallon paint cans can be stored on top of each other; however, the gallon cans are too high to stack. The cooler will be filled with packing material, and the liner will be taped shut.

As mentioned, the COC record going to the laboratory via carrier will be sealed inside a plastic bag and taped to the inside of the cooler lid or attached to the top of the cooler if a courier is used. The sampler retains one copy of the COC record. The laboratory will be notified if the sample is suspected of containing any substance for which the laboratory personnel should take safety precautions.

The cooler is shut and sealed with strapping tape (filament type) around both ends. Two signed custody seals will be placed on the cooler, one on the front and one on the back. Additional seals may be used if the sampler and shipper thinks

more seals are necessary. Wide clear tape will be placed over the seals to ensure against accidental breakage.

The following markings are placed on the top of the cooler:

- Proper Shipping Name (49 CFR 172.301)
- DOT identification number (49 CFR 172.301)
- Shipper's or consignee's name and address (49 CFR 172.306)
- "This End Up" legibly written if the shipment contains liquid hazardous materials (49 CFR 172.312)

The following labels will be placed on the top of the cooler (49 CFR 172.406e):

- Appropriate hazard class label (placed next to the proper shipping name).
- "Cargo Aircraft Only" (if applicable as identified in 49 CFR 172.101).

An arrow symbol(s) indicating "This End Up" will be placed on the cooler in addition to the markings and labels described above.

Restricted article airbills will be used for shipment. The "Shipper Certification for Restricted Articles" section will be filled out as follows for a flammable solid or a flammable liquid:

- Number of packages or number of coolers
- Proper shipping name; if unknown use
 - Flammable solid, N.O.S., or
 - Flammable liquid, N.O.S.
- Identification number; if unknown use
 - UN1325 (for flammable solids) or
 - UN1993 (for flammable liquids).
- Net quantity per package or amount of substance in each cooler.
- Radioactive materials section (leave blank).
- Passenger or Cargo Aircraft. (Cross off the nonapplicable items. Up to 25 pounds of flammable solid per cooler can be shipped on a passenger aircraft. Up to 1 quart of flammable liquid per cooler can be shipped on a passenger aircraft, and up to 10 gallons of flammable liquid can be shipped on a cargo aircraft.)
- Name and title of shipper (printed).

- An emergency telephone number where the shipper can be reached within the following 24 to 48 hours.
- Shipper's signature.

No samples shall be held on site for more than 24 hours, except during weekend field activities. Samples collected on the weekend will be stored under refrigeration and shipped the following Monday. Sampling activities for analytes with extremely short holding times, such as 24 hours, will not be scheduled for weekend collection. All DOT regulations will be followed for packaging and shipping.

Occasionally, multiple coolers will be sent in one shipment to the laboratory. One cooler will have the original COC record and the other coolers will have copies. The plastic bag in which the COC Records are placed will be marked appropriately "ORIGINAL" or "COPY." In addition, the outside of the coolers will be marked to indicate how many coolers are in the shipment.

4.2.6.3 Geotechnical Samples. Geotechnical samples will be collected in tubes as undisturbed samples or in plastic bags as bulk samples. Proper labeling procedures are described in Section 4.2.2. Holding times do not apply; however, samples should be shipped as soon as possible and kept cool to prevent drying and mold growth. Undisturbed samples should be sealed in resealable plastic bags to maintain sample moisture content.

Geotechnical samples may be shipped in a sturdy box or other container. No ice is necessary. Enough packing material should be added so that samples remain undisturbed. COC procedures are necessary to generate defensible data. Hazardous nature of the samples, including any HNU readings, name of the suspected contaminants present, and the approximate range of concentrations, if known, should be noted on the COC record.

4.2.6.4 Other Samples. Samples other than environmental or high concentration samples must be shipped according to the requirements of 49 CFR 173.24 and other applicable state and local regulations. Prior to the collection and shipment of these samples, shipment requirements shall be researched; a written description of shipment procedures shall be prepared; and the description reviewed and approved by a Montgomery Watson certified industrial hygienist prior to samples. These shipment procedures will be included in the project plan (if applicable). Examples of such samples include potential asbestos containing material land transformer fluids.

4.2.6.5 Prohibited Samples. Montgomery Watson prohibits the collection of the following types of samples:

- . Compressed gas cylinders
- . Radioactive substances
- . Biological hazards
- . Chemical warfare agents
- . Drugs (controlled substances)
- . Explosive ordnance
- . Explosives (as per DOT)
- . Shock-sensitive materials

This prohibition can only be lifted by the provision for and approval of Montgomery Watson corporate counsel and the Montgomery Watson Industrial/Hazardous Waste (I/HW) group health and safety manager.

4.2.7 Holding Times

The holding times for samples will depend on the analysis and the sample matrix. Unless otherwise specified by the contract, holding times are as given in Table 1.

5.0 REFERENCES

Enforcement Considerations for Evaluations of Uncontrolled Hazardous Waste Disposal Sites by Contractors, Draft, Appendix D, April 1980.

6.0 ATTACHMENTS

- 1 - Recommended Preservation for Water Samples by Analysis
- 2 - Sample Label
- 3 - Custody Seal
- 4 - Chain-of-Custody Record

**STANDARD OPERATING PROCEDURES
SURFACE WATER AND SEDIMENT SAMPLING**

**STANDARD OPERATING PROCEDURES
FOR SURFACE WATER AND SEDIMENT SAMPLING**

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1.0 INTRODUCTION

This guideline describes methods and equipment commonly used for collecting environmental samples of surface water and aquatic sediment for either on-site examination and chemical testing or for laboratory analysis.

The information presented in this guideline is generally applicable to all environmental sampling of surface waters and aquatic sediments except where the analyte(s) may interact with the sampling equipment. The collection of concentrated sludges or hazardous waste samples from disposal or process lagoons often requires methods, precautions and equipment different from those described herein.

Specific sampling problems may require the adaptation of existing equipment or design of new equipment. Such innovations should be clearly described in the sampling plan (or addendum to the sampling plan if the RI is ongoing) and brought to the attention of the PM.

2.0 DEFINITIONS

Environmental Sample: low concentration sample typically collected off site and not requiring Department of Transportation (DOT) hazardous waste labeling or Contract Laboratory Program (CLP) handling as a high hazard sample.

Hazardous Waste Sample: medium-to-high concentration sample (e.g., source material, sludge, leachate) requiring DOT labeling and CLP handling as a high hazard sample.

3.0 RESPONSIBILITIES

Field Team Leader (FTL): has overall responsibility for the correct implementation of surface water and sediment sampling activities, including review of the sampling plan with, and any necessary training of, the sampling technician(s). The actual collection, packaging, documentation (sample label and log sheet, chain-of-custody record, etc.) and initial custody of samples will be the responsibility of the sampling technician(s).

4.0 PROCEDURES

4.1 BACKGROUND

Collecting a representative sample from surface water or sediments is often difficult because of water movement, stratification, or patchiness. To collect representative samples, one must standardize sampling bias related to site selection; sampling frequency; sample collection; sampling devices; and sample handling, preservation, and identification.

Representativeness is a qualitative description of the degree to which an individual sample accurately reflects population characteristics or parameter variations at a sampling point. It is therefore an important quality not only for assessment and quantification of environmental threats posed by the site, but also for providing information for engineering design and construction. Proper sample location selection and proper sample collection methods are important to ensure that a truly representative sample has been taken. Regardless of scrutiny and quality control applied during laboratory analyses, reported data are no better than the confidence that can be placed in the representativeness of the samples.

4.2 DEFINING THE SAMPLING PROGRAM

Factors that must be considered in developing a sampling program for surface water or sediments including study objectives are: accessibility; site topography; flow, mixing, and other physical characteristics of the water body; point and diffuse sources of contamination; and personnel and equipment available to conduct the study. For waterborne constituents, dispersion depends on the vertical and lateral mixing within the body of water. For sediments, dispersion depends on bottom current or flow characteristics, sediment characteristics (density, size) and geochemical properties (which affect adsorption/desorption). The hydrologist developing the sampling plan must therefore know not only the mixing characteristics of streams and lakes, but also must understand the role of fluvial-sediment transport, deposition, and chemical sorption.

4.2.1 Sampling Program Objectives

The objective of surface water sampling is to determine the surface water quality entering, leaving, or remaining within the site. The scope of the sampling program must consider the sources and potential pathways for transport of contamination to or in a surface water body.

Sources may include point sources (leaky tanks, outfalls, etc.) or nonpoint sources (e.g., spills). The major pathways for surface water contamination (not including airborne deposition) are: a) overland runoff; b) leachate influx to the waterbody; c) direct waste disposal (solid or liquid) into the water body; and groundwater flow influx from upgradient. The relative importance of these pathways, and therefore the design of the sampling program, is controlled by the physiographic and hydrologic features of the site, the drainage basin(s) that encompass the site, and the history of site activities.

Physiographic and hydrologic features to be considered include slopes and runoff direction; areas of temporary flooding or pooling; tidal effects; artificial surface runoff controls such as berms or drainage ditches (and when they were constructed relative to site operation); and locations of springs, seeps, marshes, etc. In addition, the obvious considerations such as the location of man-made discharge points to the nearest stream (intermittent or flowing), pond, lake, estuary, etc., should not be overlooked.

A more subtle consideration in designing the sampling program is the potential for dispersion of dissolved or sediment-associated contaminants away from the source. The dispersion could lead to a more homogeneous distribution of contamination at low or possibly non-detectable concentrations. Such dispersion does not, however, always readily occur. For example, obtaining a representative sample of contamination from a main stream immediately below an outfall or a tributary is difficult because the inflow frequently follows a stream bank with little lateral mixing for some distance. Sampling alternatives to overcome this situation are: 1) move the site far enough downstream to allow for adequate mixing, or 2) collect integrated samples in a cross section. Also, nonhomogeneous distribution is a particular problem with regard to sediment-associated contaminants, which may accumulate in low-energy environments (coves, river bends, deep spots, or even behind boulders) near or distant from the source while higher energy areas (main stream channels) near the source may show no contaminant accumulation.

The distribution of particulates within a sample is an important consideration. Many organic compounds are only slightly water soluble and tend to be adsorbed by particulate matter. Nitrogen, phosphorus, and heavy metals may also be transported by particulates. Samples must be collected with a representative amount of suspended material; transfer from the sampling device should include transferring a proportionate amount of the suspended material.

The first steps in selecting sampling locations, therefore, are: 1) to review site history; 2) to define the hydrologic boundaries and features of the site; and 3) to identify the sources, pathways and potential distribution of contamination. Based on these considerations the numbers, types and general locations of required samples upgradient (for background measurement) on site and downgradient can be identified.

4.2.2 Location of Sampling Stations

Accessibility is the primary factor affecting sampling costs. The desirability and utility of a sample for analysis and description of site conditions must be balanced against the costs of collection as controlled by accessibility. Bridges or piers are the first choice for locating a sampling station on a stream because bridges provide ready access and also permit the sampling technician to sample any point across the stream. A boat or pontoon (with an associated increase in cost) may be needed to sample locations on lakes and reservoirs, as well as those locations on larger rivers. Frequently, however, a boat will take longer to cross a water body and will hinder manipulation of the sampling equipment. Wading for samples is not recommended unless it is known that contaminant levels are low enough that skin contact will not produce adverse health effects. This provides a built-in margin of safety in the event that wading boots or other protective equipment should fail to function properly. If it is necessary to wade into the water body to obtain a sample, the sampler should be careful to minimize disturbance of bottom sediments and must enter the water body downstream of the sampling location. If necessary, the sampling technician should wait for the sediments to settle before taking a sample.

Sampling in marshes or tidal areas may require the use of an all-terrain-vehicle (ATV). The same precautions mentioned above with regard to sediment disturbance will apply.

Under ideal and uniform contaminant dispersion conditions in a flowing stream, the same concentrations of each would occur at all points along the cross section. This situation is most likely downstream of areas of high turbulence. Careful site selection is needed in order to ensure, as closely as possible, that samples are taken where uniform flow or deposition and good mixing conditions exist.

The availability of streamflow and sediment discharge records can be an important consideration in choosing sampling sites in streams. Streamflow data in association with contaminant concentration data are essential for estimating the total contaminant loads carried by the stream.

If a gaging station is not conveniently located on a selected stream, the project hydrologist should explore the possibility of obtaining streamflow data by direct or indirect methods.

4.2.3 Frequency of Sampling

The sampling frequency and the objectives of the sampling event will be defined by the work plan. For single-event site- or area-characterization sampling, both bottom material and overlying water samples should be collected at the specified sampling stations. If valid data are available on the distribution of the contaminant between the solid and aqueous phases, it may be appropriate to sample only one phase, although this is not often recommended. If samples are collected primarily for monitoring purposes, consisting of repetitive, continuing measurements to define variations and trends at a given location, water samples should be collected at a pre-established and constant interval as specified in the work plan (often monthly or quarterly) and during droughts and floods. Samples of bottom material should be collected from fresh deposits at least yearly, and preferably during both spring and fall seasons.

The variability in available water-quality data should be evaluated before deciding on the number and collection frequency of samples required to maintain an effective monitoring program.

4.3 SURFACE WATER SAMPLE COLLECTION

4.3.1 Streams, Rivers, Outfalls, and Drainage Features (Ditches, Culverts)

Methods for sampling streams, rivers, outfalls, and drainage features at a single point vary from the simplest of hand-sampling procedures to the more sophisticated multipoint sampling techniques known as the equal-width-increment (EWI) method or the equal-discharge-increment (EDI) methods (defined below).

Samples from different depths or cross-sectional locations in the water course taken during the same sampling episode should be composited. However, samples collected along the length of the watercourse or collected at different times may reflect differing inputs or dilutions and therefore should not be composited. Generally, the number and type of samples to be taken depend upon the river's width, depth, discharge, and the suspended sediment the river transports. The greater number of individual points that are sampled, the more likely that the composite sample truly will represent the overall characteristics of the water.

In small streams less than about 20 feet wide, a sampling site can generally be found where the water is well mixed. In such cases, a single grab sample taken at mid-depth in the center of the channel is adequate to represent the entire cross section.

For larger streams, at least one vertical composite should be taken with one sample each from just below the surface, at mid-depth, and just above the bottom. The measurement of DO, pH, temperature, conductivity, etc., shall be made on each aliquot of the vertical composite and on the composite itself. For rivers several vertical composites should be collected.

4.3.2 Lakes, Ponds, and Reservoirs

Lakes, ponds, and reservoirs have a much greater tendency to stratify than rivers and streams do. The relative lack of mixing requires that a high number of samples be obtained.

The number of water sampling sites on a lake, pond, or impoundment will vary with the size and shape of the basin. In ponds and small lakes, a single vertical composite at the deepest point may be sufficient. Similarly, the measurement of DO, pH, temperature, etc., is to be conducted on each aliquot of the vertical composite. In naturally formed ponds, the deepest point may have to be determined empirically; in impoundments, the deepest point is usually near the dam.

In lakes and larger reservoirs, several vertical composites should be composited to form a single sample. These verticals are often taken along a transect or grid. In some cases, it may be of interest to form separate composites of epilimnetic and hypolimnetic zones. In a stratified lake, the epilimnion is the upper, warmer, and less dense layer of lake water (above the thermocline) that is exposed to the atmosphere. The hypolimnion is the lower, "confined" layer that is only mixed with the epilimnion and vented to the atmosphere during seasonal "overturn" (when density stratification disappears). These two zones thus may have very different concentrations of contaminants if input is only to one zone, if the contaminants are volatile (and therefore vented from the epilimnion but not the hypolimnion), or if the epilimnion only is involved in short-term flushing (i.e., inflow from or outflow to shallow streams). Normally, however, a composite consists of several verticals with samples collected at various depths.

In lakes with irregular shape and with bays and coves that are protected from the wind, separate composite samples may be needed to adequately represent water quality since it is likely that only poor mixing will occur. Similarly, additional samples should be taken where discharges,

tributaries, land-use characteristics, and other such factors are suspected of influencing water quality.

Many lake measurements are now made in-situ using sensors and automatic readout or recording devices. Single and multiparameter instruments are available for measuring temperature, depth, pH, oxidation-reduction potential (ORP), specific conductance, dissolved oxygen, some cations and anions, and light penetration.

4.3.3 Estuaries

Estuarine areas are by definition zones where inland freshwaters (both surface and ground) mix with oceanic saline waters. Estuaries are generally categorized into three types dependent upon freshwater inflow and mixing properties. Knowledge of the estuary type is necessary to determine sampling locations:

Mixed estuary - characterized by the absence of a vertical halocline (gradual or no marked increase in salinity in the water column) and a gradual increase in salinity seaward. Typically this type of estuary is shallow and is found in major freshwater sheetflow areas. Since they are well mixed, the sampling locations are not critical in this type of estuary.

Salt wedge estuary - characterized by a sharp vertical increase in salinity and stratified freshwater flow along the surface. In these estuaries the vertical mixing forces cannot override the density differential between fresh and saline waters. In effect, a salt wedge tapering inland moves horizontally, back and forth, with the tidal phase. If contamination is being introduced into the estuary from upstream, water sampling from the salt wedge may miss it entirely.

Oceanic estuary - characterized by salinities approaching full-strength oceanic waters. Seasonally, freshwater inflow is small, with the preponderance of the fresh-saline water mixing occurring near, or at, the shore line.

Sampling in estuarine areas is normally based upon the tidal phases, with samples collected on successive slack tides (i.e., when the tide turns). Estuarine sampling programs should include vertical salinity measurements at 1- to 5-foot increments coupled with vertical dissolved oxygen and temperature profiles. A variety of water sampling devices is used, but in general the Van Dorn (or similar type) horizontal sampler is employed.

4.3.4 Sampling Equipment and Techniques

The selection of sampling equipment depends on the site conditions and sample type required. The most frequently used samplers are:

- Open tube
- Dip sampler
- Weighted bottle sampler
- Hand pump
- Kemmerer or Van Dorn Sampler
- Depth-Integrating Sampler

The dip sampler and the weighted bottle sampler are used most often.

The criteria for selecting a sampler include:

- Disposable and/or easily decontaminated.
- Inexpensive (if the item is to be disposed of).
- Ease of operation, particularly if personnel protection required is above Level D.
- Nonreactive/noncontaminating - Teflon-coated, glass, stainless steel, or PVC sample chambers are preferred (in that order).

Each sample (grab or each aliquot collected for compositing) should be measured for:

- Specific conductance
- Temperature
- pH (optional)
- Dissolved oxygen (optional)

These items should be measured for as soon as the sample is recovered. These analyses will provide information on water mixing/stratification and potential contamination.

Dip Sampling

Water is often sampled by filling a container either attached to a pole or held directly, from just beneath the surface of the water (a dip or grab sample). Constituents measured in grab samples are only indicative of conditions near the surface of the water and may not be a true representation of the total concentration that is distributed throughout the water column and in the cross section. Therefore, whenever possible dip samples should be augmented with samples

that represent both dissolved and suspended constituents and both vertical and horizontal distributions.

Weighted Bottle Sampling

A grab sample can also be taken using a weighted holder that allows a sample to be lowered to any desired depth, opened for filling, closed, and returned to the surface. This allows discrete sampling with depth. Several of these samples can be combined to provide a vertical composite. Alternatively, an open bottle can be lowered to the bottom and raised to the surface at a uniform rate so that the bottle collects sample throughout the total depth and is just filled on reaching the surface. The resulting sample using either method will roughly approach what is known as a depth-integrated sample.

A closed, weighted bottle sampler consists of a stoppered glass or plastic bottle, a weight and/or holding device, and lines to open the stopper and lower or raise the bottle. The procedure for sampling is:

1. Gently lower the sampler to the desired depth so as not to remove the stopper prematurely (watch for bubbles).
2. Pull out the stopper with a sharp jerk of the sampler line.
3. Allow the bottle to fill completely, as evidenced by the cessation of air bubbles.
4. Raise the sampler and cap the bottle
5. Decontaminate the outside of the bottle. The bottle can be used as the sample container (as long as original bottle is an approved container).

Hand Pumps

Hand pumps may operate by peristaltic, bellows, diaphragm, or siphon action. Hand pumps that operate by bellow, diaphragm, or siphon action should not be used to collect samples that will be analyzed for volatile organics because the slight vacuum applied may cause loss of these contaminants. To avoid contamination of the pump, a liquid trap consisting of a vacuum flask or other vessel to collect the sample should be inserted between the sample inlet hose and the pump.

Tubing used for the inlet hose should be nonreactive (preferably Teflon). The tubing and liquid trap must be thoroughly decontaminated between uses (or disposed of after one use).

When sampling, the tubing is weighted and lowered to the desired depth. The sample is then obtained by operation of the pump, and subsequently transferred from the trap to the sample container.

Kemmerer/Van Dorn Samplers

If samples are desired at a specific depth, and the parameters to be measured do not require a Teflon-coated sampler, a standard Kemmerer or Van Dorn sampler may be used. The Kemmerer sampler is a brass cylinder with rubber stoppers that leave the ends open while being lowered in a vertical position to allow free passage of water through the cylinder. The Van Dorn sampler is plastic and is lowered in a horizontal position. In each case a "messenger" is sent down the line when the sampler is at the designated depth, to cause the stoppers to close the cylinder, which is then raised. Water is removed through a valve to fill sample bottles.

Depth-Integrated Sampling

Depth integration is used to collect a water and suspended material sample, in direct proportion to relative velocity at each increment of depth. This means that the volume of water and suspended material must enter the sample bottle at a rate proportional to the velocity of the flow passing the intake of the sampler. If a depth-integrating sampler is lowered from the surface to the bed and back at the same rate, and presuming that the sampler is not overfilled during the course of the sampling operation, each increment of flow in that vertical is sampled proportionately to the velocity.

One method of collecting depth-integrated samples is the EWI technique. Samples are taken at several equally spaced verticals across the stream, with the transit rate of the sampler (that is, the velocity at which the sampler is passed through the water column) the same in all verticals. The samples collected in each vertical are then composited into a single sample representative of the entire flow in the cross section. Since the volume collected in each vertical sample will be directly in proportion to depth and velocity at the vertical location, the composite sample of the water-sediment mixture flowing in the cross section will be discharge-weighted.

In the equal-discharge-increment (EDI) technique, the positions of sampling verticals across the stream are based on incremental discharges rather than width (i.e., deeper or higher velocity areas of the stream cross section are sampled at a closer spacing). This method provides the most accurate measure of total discharge of the contaminant for streams that are not well mixed; however, it requires knowledge of the cross-sectional stream flow distribution.

The EDI method has these advantages: variable transit rates may be used because samples can be composited in proportion to known stream flow distribution, fewer verticals need to be sampled, and cross-section discharge information is obtained. The primary disadvantage of the method is that the streamflow distribution in the cross section must be known or measured each time before sampling.

The EWI method has these advantages: discharge measurements are not needed, the technique is learned easily, and the technique is applicable where cross-sectional stream flow distribution varies because of shifting beds or other causes. The main disadvantages are that the procedure is time consuming for large streams and does not provide quantitative information on cross-sectional discharge since this parameter does not need to be measured for the EWI method. Furthermore, the EWI method requires sampling at equally spaced verticals and use of identical transit rates within each vertical.

Because these multi-point sampling techniques can become very time consuming and expensive, an alternate method often used involves sampling at the quarter points or other equal intervals across the width of the stream. Composites of individual samples collected at the quarter points can be fairly representative, providing the stream cross section is properly located.

Several depth-integrating samplers specifically designed and suitable for collecting representative samples are available. In shallow streams and wetlands that can be waded, the US DH-48 suspended-sediment sampler can be used. The US DH-59 suspended-sediment sampler was designed to be suspended by a hand-held rope in streams too deep to be waded. The US D-49 suspended-sediment sampler also has been used for many years to collect depth-integrated samples in large streams and rivers. It accommodates a 473-ml bottle and has a choice of nozzles (3.2-mm, 4.8-mm, and 6.4-mm in diameter) to control the rate of inflow of the water-sediment mixture. The D-49 sampler, which weighs about 27 kg, is suspended on a cable and operated with a reel attached to a boom. The US D-74 sampler is a modified D-49 sampler that accommodates either a 473-ml or 946-ml bottle. The US D-74 AL sampler is also a modified D-

49 sampler, but is cast from aluminum and weighs approximately 13.6 kg. This sampler can be used with a handline in slower moving streams. The US DH-76 sampler is a modified DH-59 sampler that accommodates a 946-ml bottle and is available in the regular or trace-metal series. A new sampler, designated DH-80, accommodates either a 473-ml or 946-ml Mason jar. The intake nozzle with air exhaust ports is a single-piece head molded from polypropylene. Contaminated heads can be replaced quickly and easily.

Because of the number and diversity of analyses that may be performed on collected surface water or water-sediment mixtures, a sample splitter will often be required. A churn splitter is a practical means for splitting composited samples into representative subsamples.

4.4 SEDIMENT SAMPLING

4.4.1 General

Sediment samples are usually collected at the same verticals at which water samples were collected. If only one sediment sample is to be collected, the site should be approximately at the center of the water body. This is particularly true for reservoirs that are formed by the impoundment of rivers or streams. Generally, the coarser grained sediments are deposited near the headwaters of the reservoir. Bed sediments near the center will be composed of fine-grained materials that may, because of their lower porosity and greater surface area available for adsorption, contain greater concentrations of contaminants. The shape, flow pattern, bathymetry (depth distribution), and water circulation patterns must all be considered when selecting sediment sampling sites. In streams, areas likely to have sediment accumulation (bends; behind islands or boulders; quiet, shallow areas; or very deep, low-velocity areas) should be sampled while areas likely to show net erosion (high velocity, turbulent areas) and suspension of fine solid materials should be avoided.

Chemical constituents associated with bottom material may reflect an integration of chemical and biological processes. Bottom samples reflect the historical input to streams, lakes, and estuaries with respect to time, application of chemicals, and land use. Bottom sediments (especially fine-grained materials) may act as a sink or reservoir for adsorbed heavy metals and organic contaminants (even if water column concentrations are below detection limits). It is therefore important to minimize the loss of low-density "fines" during any sampling process.

4.4.2 Sampling Equipment and Techniques

A bottom-material sample may consist of a single scoop or core or may be a composite of several individual samples in the cross section. Sediment samples may be obtained using on-shore or off-shore techniques.

When boats are used for sampling, life preservers must be provided and two individuals must undertake the sampling. An additional person should remain on shore in visual contact at all times.

The following samplers may be used to collect bottom materials:

Scoop sampler
Core samplers

Hand-operated gravity corers
Dredge samplers

Scoop Sampler

A scoop sampler consists of a pole to which a jar or scoop is attached. The pole may be made of bamboo, wood, or aluminum and be either telescoping or of fixed length. The scoop or jar at the end of the pole is usually attached using a clamp.

If the water body can be sampled from the shore or if it can be waded, the easiest and "cleanest" way to collect a sediment sample is to use a scoop sampler. This reduces the potential for cross-contamination. This method is accomplished by reaching over or wading into the water body and, while facing upstream (into the current), scooping the sample along the bottom in the upstream direction. It is very difficult not to disturb fine-grained materials of the sediment-water interface when using this method.

Core Samplers

Core samplers are used to sample vertical columns of sediment. They are useful when a historical record of sediment deposition is desired, for they preserve the sequential layering of the deposit. Coring devices are particularly useful for sediments because the "shock wave" created by descent is minimal, thus the fines of the sediment-water interface are not disturbed. Also, the sample is withdrawn intact, permitting the removal of only those layers of interest and core liners manufactured of glass or Teflon can be purchased, thus reducing the possible sample contamination. In addition, samples are easily delivered to the lab for analysis in the tube in which they are collected. The disadvantage of coring devices is that a relatively small surface area and sample size is obtained, necessitating repetitive sampling to obtain large amounts of sample needed for some analyses.

Many types of coring devices have been developed to address varying depths of water from which the sample is to be obtained, the nature of the bottom material, and the length of the core to be collected. In shallow wadeable waters, the direct use of a glass or Teflon core liner or tube is recommended. Teflon is preferred to avoid glass breakage and possible sample loss. The use of the tube by itself eliminates any possible metal contamination from core barrels, cutting heads, and retainers.

Core sampler tubes or liners should be approximately 12 inches long since only recently deposited sediments (8 inches or less) are to be sampled. Soft or semi-consolidated sediments such as mud and clays have a greater adherence to the inside of the tube and thus can be sampled with large-diameter tubes. However, because coarse or unconsolidated sediments such as sand and gravel will tend to fall out of the tube, a small diameter is required. A tube about 2 inches in diameter is usually sufficient. The wall thickness of the tube should be about 1/3 inch for either Teflon or glass. The end of the tube may be tapered by filing it down to facilitate entry of the liner into the substrate.

Hand-Operated Gravity Corers

Hand corers are generally constructed of an outer rigid metal tube into which a 2-inch ID, plastic or Teflon core sleeve fits with minimal clearance. The cutting edge of the corer has a recessed lip on which the core sleeve rests and which accommodates a plastic core catcher. The core catcher is composed of intermeshing "fingers" that point upward into the core sleeve so that when the sampler is pressed into the sediment, the core is free to move past the catcher, but the core cannot fall through the catcher upon removal of the sampler from the sediment.

Use of hand corers or liners involves pushing the device into the substrate until only 4 inches or less is above the sediment-water interface. When sampling hard or coarse substrates, a gentle rotation of the corer while it is pushed will facilitate greater penetration and cut down on core compaction. The liner is then capped with a Teflon plug or a sheet of Teflon held in place by a rubber stopper or cork. After capping, the corer is slowly extracted, the negative pressure and core catcher (if used) keeping the sample in the liner. As the bottom part of the liner comes out of the water, it too is capped. If the top or bottom of the liner contains water or air, the caps should be removed, the water carefully decanted (to avoid removal of surface sediments) and the ends packed with clean silica sand. The caps are then replaced and secured with friction tape. The orientation of the core should be marked on the sleeve.

Gravity corers are used to obtain sediment samples in water bodies deeper than 3 to 5 feet. These types of samplers can be used for collecting 1- to 2-foot cores (with a 2-inch ID), of surface sediments at depths of up to several hundred feet beneath the water surface. Because of their small diameter, gravity corers are not suitable for obtaining coarse-grained samples, but they are excellent for obtaining fine-grained materials.

The gravity core sampler operates in a manner similar to the hand-operated core. A plastic or Teflon liner (2-inch ID) fits within a metal core housing fitted with a cutting edge. Core-catchers are used to retain the core within the liner. An opening exists above the liner to allow free flow of water through the corer as it moves vertically through the water and into the sediment. The sampler has a messenger-activated valve assembly that seals the opening above the liner following sediment penetration, which creates a partial vacuum to assist in sample retention during retrieval.

Samples are obtained by allowing the sampler, which is attached to sufficient length of stainless steel cable, to drop to the bottom. The weight of the sampler drives the core into the sediment to vary depths depending on the characteristics of the sediments. The messenger is then dropped and the sampler carefully retrieved. Upon retrieval, treatment is similar to that described above for hand corers.

Dredges

Dredges are generally used to sample sediments that cannot easily be obtained using coring devices (i.e., coarse-grained or partially cemented materials) or when large quantities of materials are required. Dredges generally consist of a clam shell arrangement of two buckets. The buckets may either close upon impact or be activated by use of a messenger. Most dredges are heavy (up to several hundred pounds) and require use of a winch and crane assembly for sample retrieval. There are three major types of dredges: Peterson, Eckman, and Ponar dredges.

The Peterson dredge is used when the bottom is rocky, in very deep water, or when the flow velocity is high. The dredge should be lowered very slowly as it approaches bottom, because it can force out and miss lighter materials if allowed to drop freely.

The Eckman dredge has only limited usefulness. It performs well where bottom material is unusually soft, as when covered with organic sludge or light mud. It is unsuitable, however, for sandy, rocky, and hard bottoms and is too light for use in streams with high flow velocities.

The Ponar dredge is a Peterson dredge modified by the addition of side plates and a screen on the top of the sample compartment. The screen over the sample compartment permits water to pass through the sampler as it descends, thus reducing the "shock wave" and permitting direct access to the secured sample without opening the closed jaws. The Ponar dredge is easily operated by

one person in the same fashion as that of the Peterson dredge. The Ponar dredge is one of the most effective samplers for general use on all types of substrates. Access to the secured sample through the covering screens permits subsampling of the secured material with coring tubes or Teflon scoops, thus minimizing the change of metal contamination from the frame of the device.

5.0 REFERENCES

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6.0 ATTACHMENTS

None.

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**STANDARD OPERATING PROCEDURES
FOR FIELD DOCUMENTATION**

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1.0 INTRODUCTION

This guideline is a general reference for the required documentation to be completed by company personnel during field investigations. Documentation in the form of field logbooks, reports, and forms should be completed for every activity in the field. Records should be maintained on a daily basis as the work progresses. All field documentation should be accurate and legible because it is part of the client's product and may potentially serve as a legal document.

Sample field documentation forms are attached.

2.0 DEFINITIONS

None.

3.0 RESPONSIBILITIES

All field team members are responsible for recording daily activities. A general breakdown of responsibilities should occur as follows. An in-depth description of the documentation mentioned below is given in later sections.

Sample field documentation forms are attached.

Field Team Leader (FTL): The FTL is responsible for completing the FTL logbook; Daily Quality Control Reports (DQCRs); documentation concerning supervision of team members; duplication and distribution of applicable records.

Rig Geologist/Sampling Team: The Rig Geologist/Sampling Team is responsible for completing the drilling logbook; lithologic logs; well construction diagrams; sampling documentation such as sample labels, sample register, and chain-of-custody (COC) forms.

Water Sampling/Development Team: The Water Sampling/Development Team is responsible for completing the water sampling/development logbook; groundwater sampling/development logs, sampling documentation such as sample labels, sample register, and chain-of-custody (COC) forms.

Aquifer Data Collection Team: The Aquifer Data Collection Team is responsible for completing the aquifer logs (e.g., slug tests, step-drawdown tests, pump tests), water level records, data organization/tracking (e.g., downloading of data from data loggers).

4.0 FIELD DOCUMENTATION GUIDELINES

Field documentation serves as the primary foundation for all field data collected that will be used to evaluate the project site. All field documentation should be accurate, legible and written in indelible ink. Absolutely no pencils or erasures are to be used. Mistakes written in the field books, logs, or on forms that need to be deleted should be crossed out with one line, initialed, and dated. Skipped pages or blank sections at the end of a page should be crossed out with an "X" covering the entire page or blank section; "No Further Entries," initials, and date should be written by the person making the correction. The responsible field team member should write his/her signature, date, and time after the day's last entry. To further assist in the organization of the field books, logs, or forms, it is important to write the date on top of each page and the significant activity description (e.g., boring or well number). Each project job number should have its own field book. In addition, all original field documentation should be submitted to the project files.

The descriptions of field data/documentation given below serve as an outline; individual projects will vary in documentation needs.

4.1 FIELD LOGBOOKS

The field logbook is a bound, weatherproof book with numbered pages that serves primarily as a daily log of the activities carried out during the investigation. All entries should be made in indelible ink. A field logbook should be completed for each operation undertaken during the investigation, such as field team leader notes, drilling, groundwater sampling/development, and site visitors. The logbook should serve as a diary of the events of the day.

Field activities will vary from project to project; however, the concept and general information that should be recorded will remain similar. A detailed description of three basic logbooks in which field activities should be documented is given below. These field logbooks include the FTL logbook, rig geologist/sampling team logbook, and groundwater sampling/development

logbook. The following sections describe the minimum information that should be recorded in each of these logbooks.

FTL Logbook

The field team leader's responsibilities include the general supervision, support, assistance, and coordination of the various field investigation activities. As a result, a large portion of the FTL's day is spent rotating between operations in a supervisory mode. Records of the FTL's activities as well as a summary of the field team's activities should be maintained in a logbook. The FTL's logbook will be used to fill out daily quality control reports (DQCRs), and as such should contain all information required in these reports (refer to Section 3.3). Items to be documented include:

- Record of tailgate meetings
- Personnel and subcontractors on job site and time spent on the site
- Field operations and personnel assigned to these activities
- Site visitors
- Log of FTL's activities: time spent supervising each operation and summary of daily operations as provided by field team members
- Problems encountered and related corrective actions
- Deviations from the sampling plan
- Records of communications: discussions of job-related activities with the client, subcontractor, field team members, and project manager
- Information on addresses and contacts
- Record of invoices signed and other billing information
- Field observations

Rig Geologist/Sampling Team Logbook

The rig geologist or sampling team leader is responsible for recording the following information:

- Health and Safety Activities
 - Calibration records for health and safety equipment (type of PID, calibration gas used and associated readings, noise dosimeters, etc.)

- Personnel contamination prevention and decontamination procedures
- Record of daily tailgate safety meetings

Weather

- Calibration of field equipment
- Equipment decontamination procedures
- Personnel and subcontractors on job site and time spent on the site
- Site name and well or soil boring number
- Drilling activities
 - Sample location (sketch)
 - Drilling method and equipment used
 - Borehole diameter
 - Drill cuttings disposal/containerization (number of drums, roll off-bins, etc.)
 - Type and amount of drilling fluids used (mud, water, etc.)
 - Depth and time at which first groundwater was encountered, depth to water at completion of drilling, and the stabilized depth to water. The absence of water in the boring should also be noted.
 - Total drilling depth of well or soil boring
 - Type and amount of materials used for well installation
 - Well construction details [depth of grout (mixture, weight), bentonite seal, filter pack, etc. [include type and amount used, calculate estimated amount that should be used]
 - Type and amount of material used to backfill soil borings
 - Time and date of drilling, completion, and backfilling
 - Name of drilling company, driller, and helpers

- Sampling
 - Date and time of sample collection
 - Sample interval
 - Number of samples collected
 - Analyses to be performed on collected samples
- Disposal of contaminated wastes (PPE, paper towels, visqueen, etc.)
- Field observations
- Problems encountered and corrective action taken
- Deviations from the sampling plan
- Site visitors

Groundwater Sampling/Development Logbook

The groundwater sampling and development team members are responsible for recording the following information.

- Health and Safety Activities
 - Calibration records for health and safety equipment (i.e. type of PID, calibration gas used and readings, noise dosimeters etc.)
 - Personnel contamination prevention and decontamination procedures
 - Record of daily tailgate safety meetings
- Weather
- Calibration of field equipment
- Equipment decontamination procedures
- Personnel and subcontractors on job site and time spent on the site

- Equipment decontamination procedures
- Disposal of contaminated wastes (PPE, paper towels, visqueen, etc.)
- Site name, well number
- Water levels and product levels [time and datum that water levels are measured (i.e. top of casing)]. Purging of the well (include calculations, well volumes) with the following information:
 - Measured field parameters (temperature, pH, conductivity, odor, color, cloudiness, etc.)
 - Amount of water purged
 - Purge method: indicate bailer/pump, diameter and length of bailer, material that the bailer is composed of, type of pump, new nylon rope, etc.
- Purge water disposal/containment (Baker tank/ drums, number used, identification, etc.)
- PID readings from inside of well, purged water, and breathing zone
- Background PID readings
- Well sampling
 - Number of samples collected and type of containers used
 - Date and time of sample collection
 - Type of analyses
 - QA/QC samples collected; names given to blind samples
- Field observations
- Problems encountered and corrective actions taken
- Deviations from the sampling plan
- Site visitors

4.2 TAILGATE SAFETY MEETINGS

Tailgate safety meetings are held at the beginning of each day before the initiation of work. All personnel, subcontractors, and others who will be on the job site are required to attend. The meetings are usually conducted by the FTL, on-site safety officer, or other qualified team member. The topics discussed at the meeting should include the following:

- Protective clothing and equipment
- Chemical hazards
- Physical hazards
- Special equipment
- Emergency procedures
- Emergency phone numbers
- Directions to the hospital

All site personnel are required to sign the tailgate safety meeting form. The original form should be kept on site, and a copy should be sent to the home office.

4.3 DAILY QUALITY CONTROL REPORTS

The preparation of DQCRs is the responsibility of the field team leader. DQCRs are completed on a daily basis and should summarize the events of the day and supplement the information that is already recorded in the field logbook. DQCRs should be completed regardless of the duration of the field effort. Depending on the client, copies of the report should be distributed to the Montgomery Watson Project Manager, Montgomery Watson Project Geologist, Client Project Manager (depending on the project), field office file, and home office file. Information recorded in this report should include the following.

- Date and Weather Information. date, daily temperatures, wind speed and direction, humidity.
- Montgomery Watson Personnel and Time Spent on Site
- Subcontractors and Time Spent on Site
- Special Equipment on Site. PID, Smeal Water Sampling Rig, Hollow-Stem Auger Rig, pH meter, conductivity meter, etc.
- Work and Sampling Performed. Personnel performing specific site activities, a summary of samples collected, and a thorough explanation of the work completed.

- Quality Control Activities. Activities such as decontamination procedures, QA/QC samples taken, calibration of field equipment, etc.
- Health and Safety Levels and Activities. Field parameter measurements, including calibration of equipment. Includes daily tailgate safety meetings, level of protection used, etc.
- Problems Encountered/Corrective Actions Taken. Any technical difficulties, for example problems encountered during drilling or equipment breakdowns. Any problems that could potentially affect the quality of the samples should be included.
- Special Notes. Any information that does not fit under the categories listed above, but is important to record. Information that would be useful for future sampling such as base contacts made, visitors on site, etc.
- Next Day's Expectations
- Signature of Individual Completing the Report.

4.4 BORING LOGS

The preparation of drill logs is the responsibility of the field team members assigned to the drill rig. A detailed description of well logging is provided in the SOP for that subject. Several examples of drilling logs are given in the attachments. The exact format is dependent upon the job and the client; however, the following basic information should be recorded on the log regardless of the format.

- Project and site name
- Name of driller and drilling company
- Well/soil boring ID and location (sketch)
- Drilling and backfilling dates and times
- Reference elevation for all depth measurements
- Total depth of completed soil boring/well
- Depth of grouting, sealing, and grout mixes

- Signature of the logger.
- Description of unconsolidated materials
 - Geologic lithology description
 - Descriptive Unified Soil Classifications System (USCS) classification
 - USCS symbol
- Color (use appropriate soil color chart)
 - Penetration resistance (consistency or density)
 - Moisture content
 - Grain size information
 - Miscellaneous information (odor, fractures, visible contamination, etc.)
- Description of consolidated materials
 - Geologic rock description
 - Rock type
 - Relative hardness
 - Density
 - Texture
 - Color (use appropriate rock color charts)
 - Weathering
 - Bedding
 - Structures (fractures, joints, bedding, etc.)
 - Miscellaneous information (presence of odor, visible contamination, etc.)
- Stratigraphic/lithologic changes; depths at which changes occur
- Depth intervals at which sampling was attempted and amount of sample recovered
- Blow counts
- Depth intervals from which samples are retained
- Analyses to be performed on collected samples
- Depth at which first groundwater was encountered, depth to water at completion of drilling, and the stabilized depth to water. The absence of water in the boring should also be noted.
- Loss and depth of drilling fluids, rate of loss, and total volume of loss

- Use of drilling fluids
- Drilling and sampling problems
- PID readings

4.5 WELL CONSTRUCTION DIAGRAMS

The preparation of well construction diagrams are also the responsibility of field team members assigned to the drilling operations. This topic is further discussed in the SOP for Well Installation. The exact format of the diagram is dependent on the job and the client; however, the following basic information should be recorded and/or illustrated on the diagram regardless of the format.

- Project and site name
- Well identification number
- Name of driller and drilling company
- Depth and type of well casing
- Description of well screen and blank
- Borehole diameter
- Any sealing off of water-bearing strata
- Static water level upon completion of the well and after development
- Drilling and installation dates
- Type and amount of annulus materials used; depth measurements of annulus materials
- Other construction details (filter pack type and interval, location of centralizers, etc.)
- Surface elevation and reference elevation of all depth measurements

4.6 GROUNDWATER SAMPLING/DEVELOPMENT LOGS

The groundwater sampling/development log should be used any time that a well is developed or sampled. The following information should be recorded on the log.

- Project name and site
- Well identification number
- The date and time of sampling/development
- The water level and reference elevation
- Volume of water to be purged
- Pertinent well construction information (total depth, well diameter, etc.)
- Measurement of field parameters such as pH, turbidity, conductivity, and temperature, as well as the times at which the readings were taken.
- Type of purging and sampling equipment used
- Type of samples collected
- Sampler's initials

4.7 AQUIFER TESTING LOGS

The aquifer testing team is responsible for setting up, collecting, tracking, and organizing data. The information listed below is a partial listing of required information. Refer to the Aquifer Testing SOP for more details and the various book references as related to your project site.

- Well number/identification (data logger identification)
- Data logger information/parameter setup
- Water level (include date, time, and measurement reference (such as top of casing))
- Type of aquifer test (slug, step-drawdown, pump test, etc.)
- Slug test (include length and diameter of slug for volume calculations)

- Start time of test
- Duration of test
- Pump tests (include disposal/containment of water information)
- Field observations and problems
- Tester's name

4.8 DOCUMENTATION OF SAMPLING ACTIVITIES

Documentation to be made during sampling activities includes sample labels, sample seals, Chain-of-Custody Records, and sample register.

4.8.1 Sample Labels

A sample label should be affixed to all soil and water sample containers, and completed with the following information written in indelible ink. Required information on sample labels may vary from job to job; however, the following should be included at a minimum.

- Sample number
- Type of sample (grab or composite)
- Type of preservative, if applicable
- Date and time of collection
- Project location
- Analyte(s)
- Initials of sampling personnel

4.8.2 Custody Seals

Custody seals consist of security tape with the initials of the sampler and the date placed over the lid of each cooler containing samples. The tape should be placed such that the seal must be broken to gain access to the contents. Custody seals should not be placed directly onto the volatile organic compound (VOC) sample bottles. Custody seals should be placed on coolers prior to the sampling team's release to a second or third party (e.g., shipment to the laboratory).

4.8.3 Chain-of-Custody Records

Chain-of-custody procedures allow for the tracing of possession and handling of individual samples from the time of field collection through to laboratory analysis. Documentation of custody is accomplished through a chain-of-custody record that lists each sample and the individuals responsible for sample collection, shipment, and receipt. A sample is considered in custody if it is:

- In a person's possession.
- In view after being in physical possession.
- Locked or sealed so that no one can tamper with it after it has been in an individual's physical custody.
- In a secured area, restricted to authorized personnel.

A COC record is used to record the samples taken and the analyses requested. Information recorded includes time and date of sample collection, sample number, and the type of sample, the sampler's signature, the required analysis, and the type of containers and preservatives used. A copy of the COC record should be retained by the sampler prior to release to a second or third party. Shipping receipts should be signed and filed as evidence of custody transfer between field sampler(s), courier, and laboratory.

The COC Record will be properly signed and the date of collection and shipment recorded, along with the sample site identifications and requested analyses for each sample.

4.8.4 Sample Register

The sample register is a field record book with prenumbered pages. A full description of each sample is recorded in the book. The information included in the sample register should include the following:

- Sample number (identification)
- Duplicate and split sample numbers (identification)
- Location of sample
- Client
- Project number
- Collection method
- Number and size of bottles for each analysis
- Destination of the sample

Type of analysis
Date and time of collection
Name of sampler

Other observations may be included as the situation dictates for a thorough record that could be used to reconstruct the events concerning that sample. All information should be recorded in indelible ink.

5.0 REFERENCES

None.

6.0 ATTACHMENTS

- 1 - Tailgate Safety Forms and Health and Safety Documentation
- 2 - Daily Quality Control Reports
- 3 - Lithologic Logs
- 4 - Well Construction Logs
- 5 - Groundwater Sampling and Well Development Forms
- 6 - Aquifer Testing Forms
- 7 - Sampling Documentation and Tracking Forms

**City of San Diego Water Department San Pasqual Basin Draft Groundwater Management Plan
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	Section	Comment	Provided By	Date	Response
1	Introduction	Groundwater Management Plan for TJCWD is available. The City of San Diego should have a copy, the planning area was within the City of San Diego. I do if they don't. Also, the TJCWD has been dissolved I believe. I am not sure what the City of San Diego plans to do or what they are obligated to do in regards to the GMP. I believe the San Luis Rey MWD has adopted a GMP. Not sure if it was in accordance with "AB3030". You should contact the Water District directly.	Daniel Diehr	6/22/2007	We have taken the references out from the GMP because they have no direct connection to San Pasqual
2	Section 1.7.3.2.5	Phase II of the San Luis Rey River Valley Groundwater Storage and Recovery Feasibility Study was completed and a Final Report drafted in March 2005. If you are going to discuss the study in your report, you might want to consider reviewing the Final Report and including the results in your discussion	Daniel Diehr	6/22/2007	The text will be modified to reflect the fact that Phase II of the study was completed in March 2005. Specific references to Phase I will be removed.
3	Figure 2-1	You may want to consider including the boundaries of the other two groundwater basins that are located in the watershed (San Dieguito and Santa Maria).	Daniel Diehr	6/22/2007	Figure 2-1 will be modified to show the boundaries of the San Dieguito Creek and Santa Maria Valley groundwater basins.
4	Table 2-2	What was the time period(s) that is represented by the data used to calculate your water budget?	Daniel Diehr	6/22/2007	A column will be added to Table 2-2 listing the period used for each component of the water budget. As explained in the text, these are estimates taken from previous investigations because historic hydrologic data are not available to allow for calculation of change in groundwater basin storage for a specific year or selected period in the past.
5	General	The LISA grant proposals are going before the Water Authority Board of Directors (consent item) on June 28. You can update that section based upon the approval of funding for your project.	Daniel Diehr	6/22/2007	The following description has been added to Section 3.8.1 Local Investigations and Studies Assistance Grant-funding Program (LISA Program): "The Funding recommendations for the Local Investigations and Studies Assistance Program – First Funding Cycle. (LISA) were presented and approved by the San Diego County Water Authority Board of Directors on June 28th, 2007. The San Diego County Water Authority will enter into funding agreements totaling \$750,000 with the City of San Diego using funds derived entirely from state groundwater conjunctive use funding. The City of San Diego will use the funds towards the "San Pasqual Groundwater Conjunctive Use Project". The City will continue to pursue similar local grant funding opportunities like this one."
6	Figure 2-5	Shows several existing wells in the Valley and accompanying graphs that show ground water elevation. I am bothered by the fact that the graph matching to well 135 01W 5A2 shows such a large drop in the early years that does not seem logical in comparison to the other graphs. Although some of the other graphs show slight declines from a possible accumulation of drought years, I find it hardly logical that this one well located in a more downstream location could have suffered so much more severely than other wells. Could this be a case of bad data collection? If it is difficult to reason the evidence should the evidence be included?	Frank Koryn	6/27/2007	The City agrees that the data point collected in the 1978 time frame appears to be inconsistent with the other data represented on the graph. This observation supports the need for a monitoring program using standard data collection protocols, as presented in this GMP. This one point could be the result of bad data collection, but there is not way to be sure. The City does not make a practice of discarding inconsistent or suspect data points from the record, however, we will add the following statement "this data point appears anomalous or inconsistent with data collected before and after 1978 and may be the result of an error in field data collection or archiving"
7	Figure 2-4	Wrongly label Cloverdale Creek as San Dieguito River.	Frank Koryn	6/27/2007	Figure will be modified to reflect change
8	Figure 2-7	Wrongly label Cloverdale Creek as San Dieguito River.	Frank Koryn	6/27/2007	Figure will be modified to reflect change
9	Figure 2-9	Wrongly label Cloverdale Creek as San Dieguito River.	Frank Koryn	6/27/2007	Figure will be modified to reflect change
10	Figure 2-9	Shows wells 30R1 and 32G1 having polar opposites of Nitrate levels yet these wells are less than a ¼ mile apart and considering their location, common sense would tend you to presume that they are both influenced by the same supply source. Once again, when the stated values do not show any statistical or logical relationship to each other, should we be including them and basing a plan off of them?	Frank Koryn	6/27/2007	Good comment. The data record does include a value of "0" for 30R1 for the most recent sample, but this value is questionable for the reasons Frank describes. Figure 2-9 has been updated to include the next most recent sample collected at this location with a value of 71.4 ppm for Nitrate. This value is more consistent with other wells in the vicinity and previous samples collected at 30R1.
11	Section 3.5.7	The source data used in this report, and gathered from the last 40 years was collected and analyzed using many different methods. According to the text, "The evaluation indicated a significant range of techniques, frequencies and documentation methods for the collection of groundwater elevations and quality data. Although the groundwater data collection protocol may be adequate to meet the needs of individual agencies, the lack of consistency yields an incomplete picture of basin-wide groundwater conditions." Once again I am asking if we are doing the wrong thing by judging history when we do not have accurate and consistent historical data. Agricultural practices in the Valley as well as the types of agriculture in the Valley have changed dramatically in the last 30 years. It seems we are critiquing the practices in the Valley today based on a random and incomplete sampling of historical data. I do not doubt that we can do more to improve water quality in the Basin; however I also agree that Standard Operating Procedures should be in place before we use past data to judge current practices.	Frank Koryn	6/27/2007	The City is not passing judgement on current or historic land use practices in the basin, that is not the purpose of the Groundwater Management Plan. Section 2 presents our current understanding of basin conditions based on best available information. We anticipate that our understanding of groundwater basin conditions will improve through the implementation of the GMP and the Standard Operating Procedures included in Appendix D. Better data collection will result in improved management of this precious resource for all users. GMP text will not be modified based on this comment.
12	Figure 3-6	Old Milky Way is incorrectly identified as Old San Pasqual Rd.	Frank Koryn	6/27/2007	Figure will be modified to reflect change

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	Section	Comment	Provided By	Date	Response
13	Table 3-1	Our Policy (Project) Advisory Committee agreed that it was wrong to single out any one form of agriculture, especially not without indisputable scientific data, as a culprit for anything. Each and every time this Table was presented, we requested that identified issue number "R" be removed. Why does it continue to be in this draft at such a late date? It appears either people have personal agendas, or the time volunteered by members of the committee is worthless as nobody listens to us anyways. As a committee member, I find both of these reasons very offensive.	Frank Konyon	6/27/2007	Good comment. This comment was removed from the list.
14	Figure 2-11	Contains several labeling errors. Non existent dairies are labeled as "Dairy Farms", existing dairies are labeled as "Pasture", field cropland is labeled as "Native Vegetation," and Multiple Species Habitat area is labeled as "Vegetables." Out of curiosity, when did we begin labeling the family dairy operation as "semi agriculture?" Should this map of usages include a reference date?	Frank Konyon	6/27/2007	Land use information shown on Figure 2-11 is the latest information available from the Department of Water Resources (DWR). DWR last updated the land use information for San Pasqual Valley in 1998, as shown in the figure title. The City recognizes that land use changes have occurred since 1998, but believes that this information is adequate for the water use estimates included in Section 2.4. For this reason, the City does not intend to modify the figure, but will include updated land use maps, if available, in the bi-annual groundwater reports described in Section 3.5.8 of the GMP. A new bullet has been added to this section indicating that updated land use information will be provided when available from DWR.
15	Section 2.4.1	You list poultry farms in the Valley. I do not believe that there are poultry farms in the Valley, nor have there been for many years. Should this map of usages include a reference date?	Frank Konyon	6/27/2007	Poultry farms will be removed from the list. Please see response to previous comment regarding reference date on the map.
16	Section 2.5 (paragraph in regards to NPDES permits)	I question the accuracy of the paragraph. As I understand the way it is written in this plan, a city can discharge polluted water if they have a NPDES permit. My understanding was that a NPDES permit never gave you a "right" to discharge any sort of polluted water, but rather acknowledged that you had a possible waste stream and were set up to contain it on site. The permit would continue to monitor your containment, handling and abatement of the waste stream and keeping it separated from sources that were not contaminated.	Frank Konyon	6/27/2007	Good comment, the reviewers understanding of the NPDES program is correct and the paragraph has been modified to read "The third implication for management of groundwater in the basin is to monitor the influence of urban water runoff on water quality in the basin. The SDWMP states that the County of San Diego along with numerous other State and local agencies in and around the SPGMP area are covered under the National Discharge Permit Elimination System (NPDES) for discharges of urban water runoff to the waters of the United States (Weston Solutions, 2006). Therefore, the quality of surface water from the four creeks that supply the basin with surface water should be protected under the NPDES program. However, several PAC members involved in the development of this GMP expressed concern that urban water runoff is degrading the quality of San Pasqual's groundwater. The monitoring program described in Section 3 will enhance the understanding by the City of San Diego to better characterize changes in groundwater quality in response to urban water runoff and take appropriate action to protect groundwater if warranted.
17	Section 3.4.2	I would like to suggest the "clarification by addition" of adding the communities of Ramona and Rancho Bernardo specifically by name.	Frank Konyon	6/27/2007	comment noted and these changes have been made to the text.
18	Section 2.3.1	We are once again using data that is almost 25 years old for creek flow data. Are these flows taken at the beginning, midpoint, or end of the creeks? To say that the Santa Ysabel Creek flows an average of 102 days per year, would indicate that for every year the Creek is not flowing at all, there is a year that it is flowing for over two hundred days. Those numbers do not exactly coincide with my observations as a Valley resident. If flow begins at the beginning, but never reaches the end, do we count that as days of flow?	Frank Konyon	6/27/2007	Section 2.3.1 will be modified to explain that Figure 2-10 also shows the locations of stream gages used to monitor stream flow, that available data for each of these gages is shown on the hydrographs provided in Figure 2-10, and the period of record will also be described. This new information will show that more recent (< 25 years) data are available at 2 of the 5 gages shown on Figure 2-10. The reference to 102 days of flow per year on Santa Ysabel Creek would have been measured at USGS Gage 11026000 where the creek enters the basin. Most of this flow percolates into the subsurface and becomes groundwater flow, consist with Frank's observations and the report will be modified to explain this.
19	Section 2.3/Figure 2-10/Section 2.4.2.1.1	With this language, a reader would assume that Cloverdale Creek does not flow other than the runoff from agricultural groves on the surrounding hillsides. Due to the fact that a gauging system does not exist on Cloverdale Creek, the data in Figure 2-10 is completely misleading unless it is true that no water other than runoff comes down Cloverdale Creek. Once again, as a Valley resident for all my life, I would say that this information does not coincide with my observations. In 2.4.2.1.1 the reader is led to agree with me because you list Cloverdale Creek as a "primary inflow to the basin." Figure 2-10 should be removed from the Plan until information from Cloverdale Creek can be included as to not mislead anyone.	Frank Konyon	6/27/2007	Figure 2-10 and in fact all of Section 2 is an effort to summarize the basin conditions using best available information. Based on this comment and others like them, we have modified the introduction to Section 2 to read as follows: "This section describes the water resource setting including the current understanding of the surface and subsurface features of the San Pasqual Valley Groundwater basin (basin). This section also includes a description of the groundwater and surface water supplies in the basin. Information for this section was obtained from on-going monitoring efforts and results of previous studies and is believed to represent best available information. The charts and figures included in this section illustrate the type of information of interest and period of record for understanding the groundwater conditions within the basin. Instances where the data record appears incomplete, inconsistent or missing altogether are noted in this section and these examples are used to underscore the need for improved monitoring within the basin to collect necessary information for improved groundwater management decisions. Additional field data collection and analysis during the GMP develop period was beyond the scope of the project. However, action items focused on improved field data collection and archival are presented in Section 3 of this GMP. These action items will go into effect when the GMP is adopted by the San Diego City Council."
20	Figure 2-10	Furthermore, the three surface stream flows that are graphed with yearly discharges, show complete non correlating storm events. Once again, how do adjacent stream flows reach polar extremes in the same year. (one dry as a bone, and the other showing a 40 year storm event?) Can this information even be included when it appears to be so flawed?	Frank Konyon	6/27/2007	See response to previous comment. This information is included in the report to show what information has been historically collected within the basin, however groundwater management decisions will not be based upon this information.
21	Figure 3-5	Can we address the issues about the lack of flow data in Cloverdale Creek by placing a USGS monitoring station there? I am not sure if Figure 3-5 shows a proposed surface water gage, or an existing one (that we do not seem to have data on.)	Frank Konyon	6/27/2007	By adopting this GMP, the City is committing to continue to improve the monitoring of Cloverdale Creek. This GMP will better position the City to obtain the funding needed to adequately monitor Cloverdale Creek and the other surface water tributaries into and out of the basin.

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	Section	Comment	Provided By	Date	Response
22	Pages 2-19	I do not understand why this plan is focusing in on Nitrates and TDS only. According to the Table 2-1, Nitrates exceed primary or secondary MCL, however, do not exceed RWQCB Groundwater Quality Objectives. Chloride, Fluoride, Sulfate, Iron, and Manganese on the other hand, exceed both. In addition, Nitrates in the Valley appear to be much lower than all the surrounding areas, and do average within acceptable MCL's.	Frank Koryn	6/27/2007	This plan does not focus only on Nitrate and TDS, but more emphasis is placed on these constituents because more historic data is available to evaluate long term trends. The long term trends indicate that the concentration of TDS and Nitrate are increasing in the west area of the basin, this is an important observation and that is why Figure 2-6 through 2-9 are included. Table 2-1 should read that Nitrates do exceed the RWQCB objective and has been changed to reflect this. It should be noted that Section 2.2.3 and Table 2-1 include many other compounds and the City will continue to monitor and report on all of these compounds in the future.
23	General	Are you sure we are looking at the correct draft? I have reviewed numerous sections and completely support Frank's findings. As you'll recall we had a number of spirited discussions related to the topics listed herein. Having DONATED time, effort and substantial personal knowledge / resources (along with many other UNPAID board members) I believe the document as presented is riddled with previously addressed and corrected information. If this is in fact the correct draft than I call for an immediate rejection of the entire document until such time as your staff reviews all meeting notes and makes the previously agreed upon changes and errors of fact or omission.	Marc D. Lindshield	6/28/2007	Please see response to comments above
24	General	I will chime in with my local group of Mark and frank. The draft seems to be full of old data and assumptions based on that data.	Matt Witman	6/28/2007	Please see response to comments above
25	Section 1.2	One of the primary goals of the groundwater plan has to be gathering current information on streamflows, types of farming, invasive species.	Matt Witman	6/28/2007	The reviewer is correct in that the GMP goal as stated in Section 1.2 can only be realized if better basin information, such as stream flows and land use, is collected and reported in the future. The management actions included in Section 3 will achieve this goal. The comments about the invasive species have been addressed by adding a description of the problems and current efforts to manage the problem. A new section (2.5) has been added to the GMP describing the current efforts underway, outside of the venue of this GMP, to eradicate invasives from the basin.
26	Section 2.31	Inflows into the valley have changed substantially since 1983. Urbanization has totally changed how creeks such as Cloverdale, Santa Maria, and Santa Ysabel flow in wet years and dry.	Matt Witman	6/28/2007	Comment noted and the City agrees with this observation. The text has been modified to include this qualifier and a statement added underscoring the need for improved data collection and reporting as proposed in Section 3 of this GMP.
27	General	The section that details the type of farming in the valley is obsolete and can be easily updated.	Matt Witman	6/28/2007	Please see response to comment #14 above
28	Section 2.4.2.1.1	The Greeley and Hanson report mentioned is horrible wrong. In this day of drip irrigation there is no way that 40% of the irrigation water is returned to the groundwater. Once again the 1993 study based on data from the 80's or earlier is very outdated.	Matt Witman	6/28/2007	Comment noted. Please see response to comment 19 above. The GMP text will be modified to include the following statement. "Recent introduction of drip irrigation practices in the basin have likely decreased the volume of groundwater pumping required to meet crop demand. However, deep percolation of applied water and agricultural return flows of imported water has also decreased since drip irrigation was introduced, so the net impact on groundwater storage requires further evaluation in future groundwater modeling efforts."
29	General	I protested during the meetings and I will protest again that an invasive removal program needs to be part of protecting the groundwater both from Tds contamination and from consumption by the invasives.	Matt Witman	6/28/2007	Please see response to comment # 25 above.
30	General	I agree that there need to be major changes in how this draft is written in order for the groundwater plan to have my support.	Matt Witman	6/28/2007	Comment noted. The City appreciates your comments and contribution as a PAC member and is currently revising the document to more fully address your concerns.
31	Section 1.4.3.1	Irrigation Districts: This information is in inaccurate and incomplete. Santa Fe Irrigation District (SFID) and the San Dieguito Water District (SDWD) own a property right to local water yield in the Lake Hodges watershed. They are the only agencies to beneficially use this drinking water source since the construction of the dam in 1918. The City of San Diego owns the dam and some of the water supplies associated with this source. To date they have not been able to beneficially use any water stored in Lake Hodges. According to a 1998 agreement between the City, SFID and SDWD, 57.33 percent of the first 7,500 acre feet of water in Lake Hodges can be used by SFID and 42.67 percent can be used by SDWD. Any excess local water over 7,500 AFY will be split 50/50 between the two Districts.	Dana Johnson	6/29/2007	Thank you for the correction and more detailed information. Section has been re-written based on this input and now reads: 1.4.3.1 Santa Fe Irrigation District and the San Dieguito Water District Santa Fe Irrigation District (SFID) and the San Dieguito Water District (SDWD) own a property right to local water yield in the Lake Hodges watershed. They are the only agencies to beneficially use this drinking water source since the construction of the dam in 1918. The City of San Diego owns the dam and some of the water supplies associated with this source, but to date have not put the stored water in Lake Hodges to beneficial use. According to a 1998 agreement between the City, SFID and SDWD, 57.33 percent of the first 7,500 acre feet of water in Lake Hodges can be used by SFID and 42.67 percent can be used by SDWD. Any excess local water over 7,500 AFY will be split 50/50 between the two Districts. This agreement is subject to the conditions that: 1) The Districts request the water, 2) There is sufficient local water in Lake Hodges for the two Districts. 3) There will be at least 8,300 AF of storage in Lake Hodges available to the Districts for the remainder of the water contract year, and 4) The water will be put to beneficial use. <i>In 2008, the SDCWA is expected to complete the Lake Hodges Improvement Project, which will connect Olivenhain Reservoir to Lake Hodges with a pipeline and pump station. Once this project is complete, the base yield of 7,500 AFY will be reduced to 5,700 AFY available to the Districts; SFID will still be entitled to receive 57.33 percent and the SDWD will still be entitled to receive 42.67 percent of this water in any given contract year. This value is expected to remain the same through the year 2030.</i>

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	Section	Comment	Provided By	Date	Response
32	Section 1.4.3.1 continued	This agreement is subject to the conditions that: 1) the Districts request the water, 2) there is sufficient local water in Lake Hodges for the two Districts, 3) there will be at least 8,300 AF of storage in Lake Hodges available to the Districts for the remainder of the water contract year, and 4) the water will be put to beneficial use. In 2008, the SDCWA is expected to complete the Lake Hodges Improvement Project, which will connect Olivenhain Reservoir to Lake Hodges with a pipeline and pump station. Once this project is complete, the base yield of 7,500 AFY will be reduced to 5,700 AFY available to the Districts; SFID will still be entitled to receive 57.33 percent and the SDWD will still be entitled to receive 42.67 percent of this water in any given contract year. This value is expected to remain the same through the year 2030.	Dana Johnson	6/29/2007	Please see response to comment #31
33	General	SFID and SDWD have not been identified as key players in the Lake Hodges Watershed. The report identified numerous other agencies including the SDCWA. I realize that the watershed area is within the City of San Diego and that the City does own some of that. The Districts concern is that since we are the only ones to draw water from Lake Hodges, we should have a say in what happens in the Watershed. Granted with the ESP project comes on line in 2008, water will be shared by other agencies.	Dana Johnson	6/29/2007	Comment noted. The City appreciates your comments and contribution as a PAC member. We have included the expanded discussion of SFID's interest in the basin (please see response to comments 32 and 33) and we encourage SFID to continue to be involved in the implementation of the GMP.
34	General	Until then, the two Districts will continue to be the only agencies pulling water. We are very concerned about the water quality in the lake and in the basin. Having the Districts listed as agencies to contact concerning future development will only help the City. We are going be pulling water from Lake Hodges for many years to come whether or not the ESP starts or not. To date we have not be able to be listed as a key player in this report. The RE Badger Filtration Plant's plant manager has been involved in many groups and discussions concerning Lake Hodges and the watershed. We have been pushing the regulatory agencies as well as other water Districts to get involved in the management of Lake Hodges.	Dana Johnson	6/29/2007	They have been added as a key stakeholder on Section 1.4.3.1 on page number __
35	General	I would suggest that this report be given back to the group with redlines to make sure that all comments addressed by Frank are included in the report. Since this is an important document that will be used for years to come, taking the time to make the necessary corrections is worth the extra time. An inaccurate report is no good to anyone.	Dana Johnson	6/29/2007	The City is providing each of the reviewers with a response to comment form describing how the GMP was modified based on input from the PAC. This form will accompany the revised GMP.
36	In response to Dana Johnson's comments	Excellent job! I also appreciate that you work during dairyman's hours. Thank you for your support of my comments. Your comments were likewise on target. I went back and reviewed your reference and saw how they really breezed over SFID and SDWD. I was thinking how that was also similar to how they breezed over the issue of invasive plants robbing groundwater and contributing to pollution in the Valley. That is located in item 2.4.2.1.2, "Native Wetlands." We all come from different backgrounds and different areas of familiarity, but that is what makes our team strong. The errors that I do not see in this report, you do, and vice versa. When the voice of the team and the people that it represents is not listened to, we loose our democracy.	Frank Konyon	6/29/2007	Comment Noted. GMP has not been modified based on this comment.
37	In response to Dana Johnson's comments	It is unfortunate that we take our personal times to read and correct a document which someone else receives a large contract sum to basically sit in an office and accumulate various amounts of work from over the years. Do we consider that investigative journalism or ignorant plagiarism? I personally do not feel that the Water Department got their moneys worth out of this project. I wholeheartedly agree that we all need to work together on the same page for the future, but a vast majority of this written report is merely an accumulation of previous individual estimations and a lack of fact. The one benefit will be the developed software that allows us to track into the future under standard operating procedures.	Frank Konyon	6/29/2007	Comment Noted. GMP has not been modified based on this comment.
38	1.4.3.1 Irrigation Districts	"A contractual agreement exists between the City..." Unclear which city the reference is to - San Diego or Escondido. The discussion in 1.4.2.3 is about City of Escondido. 1.1 says "The City of San Diego (San Diego)..." indicating that City of San Diego will be abbreviated "San Diego"	Bob Pierotti	6/28/2007	This text has been modified in response to comment 31 above, please see response to comment 31.

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	Section	Comment	Provided By	Date	Response
39	1.4.3.2 Land Lessees	"The City..." same comment as above. ("A contractual agreement exists between the City..." Unclear which city the reference is to - San Diego or Escondido. The discussion in 1.4.2.3 is about City of Escondido. 1.1 says "The City of San Diego (San Diego)..." indicating that City of San Diego will be abbreviated "San Diego")	Bob Pierotti	6/28/2007	Text has been modified to refer to the City of San Diego, rather than the City.
40	1.7.1.1	"The City of San Diego...northern limits of the San Diego city limits which..." Suggested Rewrite: "The City of San Diego...northern parts of the city, which"	Bob Pierotti	6/28/2007	Comment noted and text has been revised accordingly.
41	2.1 Environmental Setting	"The City of San Diego (City) owns the majority of the land..." Inconsistent with the abbreviated for the City of San Diego defined in 1.1 Also should be "owns most of the land..." Not majority.	Bob Pierotti	6/28/2007	Comment noted and references to the City of San Diego have been changed globally to "San Diego" as defined in Section 1.1. Correction in Section 2.1 has been made in response to this comment.
42	2.2.1	CDWR, 1959 is not listed in the References	Bob Pierotti	6/28/2007	Comment noted and CDWR, 1959 has been added to the reference list.
43	2.2.2	CDWR 1967 is not listed in the references	Bob Pierotti	6/28/2007	Comment noted and CDWR, 1967 has been added to the reference list.
44	2.2.2.2	"These creeks flow through the basin and leave the hydrologic subarea through the San Dieguito River..." Suggested Rewrite: These creeks flow through the valley and leave the hydrologic subarea as the San Dieguito River	Bob Pierotti	6/28/2007	Text has been modified as suggested by the reviewer.
45	2.2.2.2	"Stream gauge stations...and average annual flow estimates for these creeks can be estimated."	Bob Pierotti	6/28/2007	Text has been modified as suggested by the reviewer.
46	2.2.2.3	"State well 13S/02W-12G1..." This suggests that the well belongs to the State. Suggest "State well number 13S/02W-12G1..." Same comment for several more wells on pages 2-14 & 2-15.	Bob Pierotti	6/28/2007	Text has been modified as suggested by the reviewer.
47	2.2.2.3	"This could potentially indicate that the basin..." Also on page 2.14 (near bottom): "The groundwater elevation...which could potentially indicate..."	Bob Pierotti	6/28/2007	Text has been modified as suggested by the reviewer.
48	Page 2.14	"below the groundwater surface for the majority of the period of record..." Should be: "below the groundwater surface for most of the period of record..." Not majority.	Bob Pierotti	6/28/2007	Text has been modified as suggested by the reviewer.
49	2.4.2.1.1	DWR (1983) not in Reference	Bob Pierotti	6/28/2007	Comment noted and CDWR, 1983 has been added to the reference list.
50	2.3.1	In the discussion of surface water quality starting about page 2-30, there is not mention of the 1990 & 1991 surface water quality data that is available in the June 1993 DWR report San Diego Region Ground Water Studies, Phase VI... See surface water quality discussion starting on page 66 of that report.	Bob Pierotti	6/28/2007	Thank you for this valuable comment, the City has reviewed the reference document and included this information in the discussion. Specifically we have include Plate 8 and pages 70 and 71 in a new appendix of the GMP and make reference to this more recent sampling in each of the creek descriptions in Section 2.3.1. We also added this new text to the first paragraph of Section 2.3.1 "Under natural conditions, stream flow in San Pasqual Valley is intermittent; however, irrigation runoff and waste water discharge cause protracted flow in some streams. For example, much of the flow in Santa Maria Creek comes from the effluent from the Santa Maria Wastewater Treatment Plant (WWTP), which is discharged on spray fields upstream in the Romona hydrologic subarea (CDWR, 1993)."
51	3.2.1	"TDS and nitrate concentrations from wells often exceed..." This suggests to me that concentrations change from time to time rather than place to place. Suggested rewrite: TDS and nitrate concentrations at many wells	Bob Pierotti	6/28/2007	Text has been modified as suggested by the reviewer.
52	Plan Development Process	In the absence of a "technical advisory committee", (and because the more technically-oriented members of the advisory committee participated on less than a regular basis, the draft plan should be reviewed by an independent technical reviewer with groundwater expertise – not just monitoring expertise but expertise in program measures that can be taken to address groundwater problems	Craig Adams	6/29/2007	This GMP has been reviewed by Bob Pierotti, Chief of the Resources Assessment Branch, Southern District of the California Department of Water Resources. The GMP was also reviewed by Daniel Diehr a Hydrogeologist in the Water Resources Department, San Diego County Water Authority. Comments from these groundwater experts along with comments received from the PAC are being incorporated into the revised GMP. The GMP meets all requirements of the Water Code and will serve as the foundation for improved groundwater management once adopted by San Diego's City Council. Furthermore new management actions may be added in the future based on public input and need, and will be documented in the bi-annual groundwater reports described in Section 3.5.8. GMP text will not be modified based on this comment.
53	1.2 Purpose and Goals of SPBMP	As stated, the goal is directed only to conditions "within" the basin – water quality and supply within the basin can impact conditions outside the basin; goal should recognize this and commit to contributing to goals for adjacent areas. Specifically, as I understand it, groundwater quality within the San Pasqual Groundwater Basin is likely to impact water quality in Lake Hodges. Maybe "protect ... for beneficial uses including water supply ..." might be seen as encompassing this concern – but it should be clearer and explicit.	Craig Adams	6/29/2007	The City of San Diego also believes that improving groundwater conditions in San Pasqual groundwater basin will likely have a beneficial effect on downstream water users, but the purpose of this GMP is groundwater in the basin. For this reason, the City will not modify the goal statement to add clear and explicit statements about conditions outside the basin. However, San Diego will continue to encourage outside interests to participate in the implementation of this GMP as described in Section 3.4 and 3.8.
54	1.4.1 Background – City of San Diego	Not sure reference to "Vision Plan" as "part of General Plan developed in 2004" is technically accurate. Explicit reference needs to be made to the San Pasqual Valley Community Plan, which IS part of the City's General Plan.	Craig Adams	6/29/2007	Thank you, an explicit reference to the San Pasqual Valley Community Plan has been added to this section.

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	Section	Comment	Provided By	Date	Response
55	1.4.3.2 Land Leases (City of San Diego)	Something's missing in second sentence – presumably a reference to a later map. There should be more "background" on the nature of the City leases – how many; for what periods of time; what types of BMP conditions are presently included.	Craig Adams	6/29/2007	A reference to Figure 1-2 has been added. Information on example BMP's required in lease agreements to protect the environment, and groundwater quality specifically, have also been added. Lease information is available from the Real Estate Assets Department.
56	1.6.1 Existing Groundwater Management Plans	Unless this is a state requirement, it is very disruptive for the reader - with a primary interest in the San Pasqual Basin - to be presented with all this "somewhat peripheral information about "adjacent agencies" (some listed are nowhere adjacent – ie. Sweetwater, Tia Juana). If included, should be placed in an Appendix and referenced briefly.	Craig Adams	6/29/2007	This information has been moved to an Appendix
57	1.7.1 Other Water Management Efforts – San Pasqual Valley	Individual studies are listed – but there is no analysis of commonalities or distinctions. Should include some type of summary of "studies/recommendations to date."	Craig Adams	6/29/2007	Good comment. This section has been modified to include only a listing of other water resources management activities in the region. The summary descriptions have been moved to an Appendix.
58	1.7.2.1 San Diego – General Plan	Again, no recognition is given to San Pasqual Community Plan. If the community plan addresses groundwater related matters, this should be identified.	Craig Adams	6/29/2007	This section has been moved to an appendix and the following paragraph has been added: "In 1995, San Diego adopted the San Pasqual Valley Plan that includes specific goals aimed at the long-term protection and management of the San Pasqual Valley (Valley). The San Pasqual Valley Plan is now included within the City's General Plan. The Valley was also identified as a region for development of potential groundwater resources. The City of San Diego is responsible for following through with directives written in the San Pasqual Valley Plan."
59	1.7.3.2 San Diego County Water Authority	This is all very generic – while relates to San Pasqual Basin and sets framework, is not specific to the basin. Suggest moving to Appendix with general cross reference and summary of points that are particularly relevant to San Pasqual Basin.	Craig Adams	6/29/2007	Good comment. This section has been modified to include only a listing of other water resources management activities in the region. The summary descriptions have been moved to an Appendix.
60	1.8 Authority to Prepare and Implement the SPGMP	First sentence is unclear – is there a memorandum of understanding? Or is one being proposed?	Craig Adams	6/29/2007	This paragraph has been re-written as follows: "On June 27, 2005 the City Council adopted the San Pasqual Vision Plan Council Policy 600-45 (included in Appendix D) to comprehensively protect the water, agricultural, biological and cultural resources within the San Pasqual Valley. The GMP is a required element of the policy"
61	1.9 SPGMP Components	Should be included in the introductory material that lays out what the State says a Groundwater Plan should/must include. Introductory material should also say what the "groundwater management plan is expected to be used for. One of the "uses" – presumably is to qualify the basin to receive state grant funds. Real need is to describe for the reader why the plan is important – that is, why it makes any difference and why people should spend some time reviewing/understanding it. Should say, "plan will help in accomplishing the following: a) ...; b) ..."	Craig Adams	6/29/2007	Great comment. This section has been re-written to address the points raised in this comment. Section 1.9 now closes with this paragraph "Addressing each of these components in the groundwater management plan demonstrates to the State, that the local groundwater basin management authority has a plan to protect the groundwater resource in a sustainable method for the benefit of current and future interests in the basin. Once adopted by the City of San Diego, the San Pasqual GMP will be evaluated and scored by the California Department of Water Resources at the time that San Diego applies for grant funds from current (Proposition 50, 84, 1e and the AB303) and future state grant programs. San Diego anticipates receiving funds from these grant programs to help finance groundwater improvement projects in the basin. San Diego's potential to receive grant funds under these programs is diminished if San Diego were not to adopt the San Pasqual GMP or if the components in the Table 1-4 are missing from the GMP."
62	1.10 Report Organization	Discussion of the organization of the report should come in a very early section – not on 1-29	Craig Adams	6/29/2007	Good comment. "Report Organization" has been moved forward to Section 1.2 in the Introduction.
63	2.1 Environmental Setting	Statement that, "Within the Basin, AG-RES and AG water demand is met almost solely from groundwater" is contradicted in later analysis. Something as basic as whether city water is available to the study area, whether it is metered, and, if so, how much is used (and how does the use level compare to "normal domestic use standards") should be addressed.	Craig Adams	6/29/2007	The City of San Diego does not supply water to the basin other than making groundwater available to the leases. The City does not maintain records on other sources of imported supply to the basin.
64	2.2.1 Groundwater Basin	The reference to "Bulletin 118" is unclear; at the least, webpage address should be provided.	Craig Adams	6/29/2007	Web address is included in the footnote at the bottom of the page.
65	2.2.2 Recharge & Extraction of Groundwater	"Santa Ysabel Creek" is misspelled. Reference is made in a "recharge" context to "imported water" – depending on its magnitude potentially in conflict with the "water demand is met almost solely from groundwater" characterization.	Craig Adams	6/29/2007	The spelling error has been corrected. The City of San Diego does not supply water to the basin other than making groundwater available to the leases. The City does not maintain records on other sources of imported supply to the basin.
66	2.2.2.3 Groundwater Elevations	It's hard to understand why the most recent data on groundwater elevations is over 10 years old – there can be big changes over 10 years, such as greater drawdown (which is why some attention should be given to patterns of agriculture and water use in the valley over the last couple of decades – since trends in extraction are as important as history and actuals, these trends in agricultural use should be addressed but are not even qualitatively identified). The text suggests the situation can change substantially over the period of a decade. But there is no discussion beyond the mid-1990's. Even if there is only anecdotal data from more recently collected data, it should be provided – and professional interpretation, as to its significance, offered. What do the users say about groundwater elevations from their experience?	Craig Adams	6/29/2007	The 1995 data were used because this was the last time enough representative groundwater elevation data was collected to be able to create a groundwater elevation map for the entire basin. The text has been modified to explain this situation. More recent data is available from many wells throughout the basin as shown on the well hydrographs included in Figure 2-5 and the text has been modified to explain this. Trends in agricultural pumping are not presented because the data does not exist. The wells are not metered and historically no attempt has been made to record and archive groundwater extraction volumes.

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	Section	Comment	Provided By	Date	Response
67	2.2.3 Groundwater Quality	The tabular information on groundwater quality includes comparisons to the "applicable drinking water quality standards" (MCLs). But nowhere that we can find is there any information or any discussion of the extent to which, if any, the basin is used as a source of drinking water directly – or how the basin may affect Lake Hodges, which is a drinking water source.	Craig Adams	6/29/2007	It is beyond the scope of this Groundwater Management Plan to investigate how changes in groundwater management may or may not impact surface water quality in Lake Hodges. Rather than study this issue in more detail at this time, the City intends to use this GMP as a vehicle for obtaining grant funds to improve the quality and availability of groundwater in the basin. By doing so, it is anticipated that groundwater basin can be used to meet not only agricultural demand, but also serve as a municipal water supply, meeting all applicable MCLs.
68	2.2.3 Groundwater Quality	Reference to the San Dieguito Watershed Management Plan (SDWMP), when discussing water quality in the San Pasqual Basin is not adequate or appropriate. The SDWP did not address water quality specifically in the San Pasqual Basin. Extending the generalities in the watershed-level plan to the basin is not accurate or instructive	Craig Adams	6/29/2007	Comment noted. This section includes relevant excerpts from previous plans and studies. The PAC encouraged the City of San Diego to make reference to the San Dieguito Watershed Management Plan (SDWMP) during development of the SPGMP.
69	2.2.3 Groundwater Quality	Reference is made in the list of "identified sources of contamination" to "...animal grazing, concentrated animal facilities, agriculture..." However, the draft report does not reflect any research or monitoring information on these potential agricultural-related sources of pollution in the basin	Craig Adams	6/29/2007	Reference is made to the San Dieguito Watershed Management Plan (SDWMP) which lists the "Identified sources of contamination" Text will be modified to "Identified sources of potential contamination".
70	2.2.3 Groundwater Quality	Reference is made to Best Management Practices (BMPs) in the SDWMP. But there is no analysis or information of the extent to which provisions regarding BMPs are being employed in the basin – or, since the City is the land owner, the extent to which provisions regarding the use of BMPs are included in the leases	Craig Adams	6/29/2007	Please see response to Comment #55
71	2.2.3 Groundwater Quality	Again, it would be useful to hear from the users about what they are experiencing in terms of water quality – and what kinds of problems they may be facing or concerns they have regarding the future	Craig Adams	6/29/2007	This type of information was solicited in the first 2 PAC meetings during development of the GMP and the issues identified are summarized on Table 3-1
72	2.2.3 Groundwater Quality	The discussion is all about contaminant levels. There should be some discussion about the impacts – or the potential impacts – of the contaminant levels. For example, do any of the indicators of groundwater contamination have the potential to significantly impact water quality in Lake Hodges? What are the implications for the types of agriculture that will be feasible – and the water budgets for shifts in the agricultural profile as a result of groundwater quality changes	Craig Adams	6/29/2007	These are good questions, but the City of San Diego is not yet ready to discuss the implications of Lake Hodges water quality or agricultural practices based on these historic data sets. San Diego will first implement the groundwater measuring and monitoring program described in Section 3. San Diego will report the results of monitoring with conclusions and recommendations for improving groundwater basin management in Bi-annual reports described in Section 3.5.8.
73	2.2.3 Groundwater Quality	"What does the data mean?" is always a useful question to address – especially for the general public. More is hoped for in this respect.	Craig Adams	6/29/2007	A summary paragraph has been added to the revised GMP summarizing the groundwater quality constituents above MCLs or RWQCB objectives, describing the need to identify the sources of contamination so that appropriate management actions can be taken to improve groundwater quality in the basin.
74	2.2.3 Groundwater Quality	Why does the discussion of water quality seem to focus on MCLs? Aren't the "RWQCB Groundwater Quality Objectives", which are included in the table, more relevant – especially when the "objectives" are presented as specific to the San Pasqual Basin? In this respect, why does the table report that RWQCB objectives are NOT exceeded for Nitrates when the objective is 10 mg/L and the average for the western basin is 40 mg/L and for the eastern basin 10 mg/L – with maximums to 174 mg/L in the west and 141 mg/L in the east	Craig Adams	6/29/2007	Table 2-1 should read that Nitrates do exceed the RWQCB objective and has been changed to reflect this. Both MCLs and RWQCB objective are used as a point of reference because groundwater has to be treated to meet MCLs before it can be used as a public drinking water supply. RWQCB objectives are of interest because groundwater in the basin cannot be degraded beyond these objectives by any activity at the surface, be it agriculture, urbanization, groundwater recharge, etc...The text will be modified to include this explanation.
75	2.2.3 Groundwater Quality	The data that is presented doesn't seem very clear or conclusive regarding water quality conditions or trends. What do the users of the water say about water quality – and also about supply conditions	Craig Adams	6/29/2007	Please see responses to comments 71 and 73 above.
76	Figure 2-9 Recent Nitrate Concentrations	Conclusion that highest nitrate concentrations are in "central and western portions of the basin" seem overdrawn – at least from the limited data presented, when one of the easternmost well sites reported 50 to 100 ppm concentration. Is this data point an outlier – or should it be taken as an indicator of concern?	Craig Adams	6/29/2007	The Figure has been corrected to show at detection of 71.4 ppm Nitrate instead of 0.0 ppm at the monitoring well near Cloverdale Creek. This further supports the statement made in the text.
77	Figure 2-9 Recent Nitrate Concentrations	Explanation for the table reports refers to the Weston Watershed Management Plan in identifying a potential list of nitrate contamination. This list includes: urban and industrial runoff, wastewater discharges, septic systems, sewerage overflows, and agricultural use of fertilizers. These are watershed-level generalizations. They do not seem especially applicable to the San Pasqual Basin. Based on an analysis of the potential contamination sources – or professional judgment – what are the most likely large contributors to nitrate contamination in the basin?	Craig Adams	6/29/2007	For now, the City of San Diego prefers the more general language rather than implicating specific land uses until more defensible monitoring data are available to support the findings. This data would be collected under the monitoring program described in Section 3 and could be implemented by the City of San Diego following adoption of this GMP.

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	Section	Comment	Provided By	Date	Response
78	Figure 2-9 Recent Nitrate Concentrations	In the Project Advisory Committee discussions, comments from members highlighted their feelings that urban runoff from Ramona and the Cloverdale Creek area were major sources of contamination. Is there evidence to support this? What are professional judgments about the general magnitude of the contaminant contributions from these upstream sources.	Craig Adams	6/29/2007	For now, the City of San Diego prefers the more general language rather than implicating specific land uses until more defensible monitoring data are available to support the findings. This data would be collected under the monitoring program described in Section 3 and could be implemented by the City of San Diego following adoption of this GMP.
79	2.3 Surface Water Conditions	The use of flow information from 1983 – 24 years ago – to estimate stream flow seems a stretch, especially in a situation where there is rapid grow and urban-based irrigation water is a significant contributor to flow	Craig Adams	6/29/2007	Please see responses to comments 19-21 above.
80	2.3.1 Creeks & Rivers – Characteristics and Water Quality	There is no discussion of the vegetation condition along the creeks – which are dominated by invasive plants, several of which, such as tamarisk, are highly water consumptive. This factor was identified in discussions by one of the valley leaseholders but is nowhere mentioned or analyzed	Craig Adams	6/29/2007	Please see response to comment # 25 above.
81	2.3.1.5 San Dieguito River	While naming of segments of any river system is merely a convention, discussing the "convergence" of the Cloverdale, Santa Yabel, Guejito and Santa Maria Creeks is confusing – because these creeks do not converge. The convention I'm aware of it that the San Dieguito River begins at the confluence of Santa Ysabel Creek and Santa Maria Creek	Craig Adams	6/29/2007	Good comment. The sentence has been rewritten as follows: "The San Dieguito River begins at the confluence of Santa Ysabel Creek and Santa Maria Creek....."
82	2.4 Water and Land Use	The conclusion, "... believed that the primary water supply within the basin by leaseholders is from groundwater." (which is repeated in several places) is contradicted in 2.4.2 Water Budget where the estimate is that 1,910 AF/yr of "agricultural return flows" were "from imported water". This is about one-third of the "total inflows" to the groundwater basis estimated for "agricultural return flows." Unless there is some reason to believe that the profile for agricultural return flows to the basin are different from the use of water (doesn't seem very likely; a case could even be made that the inverse might be the case due to the potential use of imported water for dairy and other operations), this suggests that one-third of the water used in the basin for agriculture may be from Imported water	Craig Adams	6/29/2007	Please see responses to comments 63 and 65.
83	2.4 Water and Land Use	Text says, "Although a more recent land use map for the basin is available through the City of San Diego" (used older map because it provides more crop-specific information). The best, up-to-date information, even if it has limitations, should be presented. A key factor is the questions of whether there are changes of agricultural use taking place in the San Pasqual Valley – and, if so, what are the implications of these changes relative to water budgets and with respect to contamination types and levels	Craig Adams	6/29/2007	Land use information shown on Figure 2-11 is the latest information available from the Department of Water Resources (DWR). DWR last updated the land use information for San Pasqual Valley in 1998, as shown in the figure title. The City recognizing that land use changes have occurred since 1998, but believes that this information is adequate for the water use estimates included in Section 2.4. For this reason, the City does not intend to modify the figure. A new bullet has been added to this section indicating that updated land use information will be provided when available from DWR.
84	2.4 Water and Land Use	Even if more recent data on crop types is not available, can't there be some type of "sensitivity analysis" that shows how much of a difference – in terms of water budget and contaminant types and levels, shifts of crop types might make	Craig Adams	6/29/2007	The City believes the information included in this section is sufficiently detailed for the SPGMP. The City will look for opportunities to update and further define the water budget during implementation of future groundwater protection projects.
85	2.4 Water and Land Use	A recent article in the Ventura County newspaper reported on a recent study that concluded that agricultural fertilization contributed significantly to nitrate contamination of groundwater (will supply more specific reference). Does the study that is referenced have any applicability to the circumstances her or are there other studies that address the impacts of the type of agricultural use in the valley in circumstances that are similar to the conditions in the San Pasqual Valley (this is an area where technical review could be helpful	Craig Adams	6/29/2007	Please see response to comments 77 and 78 above.
86	2.4.1 Land Use	Does the conclusion that "Native vegetation accounts for almost half of the land within the basin" take into account the fact that there are large populations of non-native, natural-type vegetation in the basin	Craig Adams	6/29/2007	Please see response to Comment #25 above
87	Figure 2-11 – San Pasqual Valley Land Use	The map is not readable even if magnified. 10 year-old data on land use is not especially useful for evaluating the present situation or – by itself – looking ahead.	Craig Adams	6/29/2007	Please see response to comment 83 above
88	2.5 Implications for Management of Groundwater	Section starts out by saying, "Groundwater management within the basin will provide a basis for monitoring the groundwater quality within the SPGMP area." "Groundwater management" should consist of both actions to address identified problems and monitoring to develop more information about problems and to gage how well the "action program" is working	Craig Adams	6/29/2007	Comment noted and clarifying language has been added to this paragraph.

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	Section	Comment	Provided By	Date	Response
89	2.5 Implications for Management of Groundwater	Monitoring the "influence of urban water runoff on water quality in the basin" is certainly important. But what is it in any of the analysis that is presented that suggests it is more important (as it is presented here) than other types of monitoring, including monitoring of the impacts associated with agriculture, which is identified in text as a general category of potential contamination	Craig Adams	6/29/2007	Comment noted and clarifying language has been added to this paragraph to not single out any particular land use in the monitoring program
90	2.5 Implications for Management of Groundwater	"More data, more data" – conclusion seems to be: no evidence that any actions are needed (which contradicts later identification of some action measures)	Craig Adams	6/29/2007	Comment note. Text has not been modified in response to this comment.
91	2.5 Implications for Management of Groundwater	Haven't the members of the Project Advisory Committee said there are "problems" with the groundwater – both in terms of quantity and quality? Why doesn't the report document their expressions in this respect? At the least, these concerns might help the development of research and data gathering programs	Craig Adams	6/29/2007	Concerns expressed by the Project Advisory Committee and others are listed in Table 3-1. The actions in Section 3 address the groundwater issues. The City of San Diego intends to continue communication with stakeholders during implementation of the GMP and involve them in the development of future groundwater projects and management actions.
92	2.5 Implications for Management of Groundwater	The title of this section suggests that this will be a discussion of the "Implications" of the previous sections – it simply does not serve this function	Craig Adams	6/29/2007	Comment noted. This section will be re-written to more specifically address the adequacy of existing information to make groundwater management decisions in each of the areas described in Section 2 (geology/hydrogeology, groundwater level data, groundwater quality, surface water flows, surface water quality, land use information, and water budget).
93	3.1 Groundwater Management Goal	Goal statement has an unclosed quote. The acronym "BMO" is used but couldn't find origin – as I recall, it stands for Basin Management Objective. Found it – in 3.2 Basin Management Objectives – but well after it is first used.	Craig Adams	6/29/2007	First use of Basin Management Objective (BMO) occurs in the first paragraph of Section 3.
94	Section 3 – Management Plan Elements	Following are some summary comments on the Management Plan Elements that are offered to meet the comment period deadline. The commenter's intention is to follow these up with some more specific observation and suggestions.	Craig Adams	6/29/2007	Comment Noted
95	Section 3 – Management Plan Elements	With respect to Groundwater Water Quality, the "planning philosophy" is largely one of "more monitoring and reactive incident planning" – that is, collect more data, if problems are identified by specific monitoring results, act to control or mitigate.	Craig Adams	6/29/2007	The planning philosophy is more one of "understand the nature of the problem before building expensive projects that may or may not solve the problem" The City of San Diego has an obligation to be a good steward of public funds, so we are following a proven and methodical approach to collecting defensible data before implementing groundwater resource improvement projects.
96	Section 3 – Management Plan Elements	This "more study and respond, if problems are specifically identified" approach seems inconsistent with some underlying realities: <ul style="list-style-type: none"> • Problems have been identified and there are trends that suggest the appropriateness of action – now • Type of actions to address the identified problems have been enumerated (in particular, a suite of Best Management Practices) – but the implication of the proposed "management plan" is that somehow implementation of these measures should be put on hold until more data has been gathered and analyzed • Given the nature of groundwater contamination, it is very difficult to remediate and correct AFTER the problem has been established through monitoring; this suggests the emphasis should be on cost-effective preventive measures. Clean-up is always expensive – especially of groundwater basins – and the history shows sometimes clean-up isn't feasible. • The sentiments I heard at the advisory group discussion were that "action should be taken, not just more study" 	Craig Adams	6/29/2007	Comment noted. The City of San Diego has presented available basin information in Chapter 2 and noted the data gaps and implications this has on groundwater basin management. You correctly note that groundwater remediation programs are expensive, so the City of San Diego is acting as a good steward of public funds by characterizing the nature and extent of contamination and isolating source areas, before building projects to remediate.
97	Section 3 – Management Plan Elements	"Partner with to implement BMP's" isn't adding any value to the discussion. What are the "partnership initiatives" that are intended? For example, is the City open to a leasing incentive structure to encourage the implementation of management practices that will accomplish the water quality and efficient use objectives?	Craig Adams	6/29/2007	Yes lease agreements already include adherence to BMPs established in earlier planning efforts and may be modified in the future to include additional groundwater resource protection measures.
98	Section 3 – Management Plan Elements	Concerning "monitoring" – the emphasis is on a "comprehensive program of monitoring" with no identified price tag. Consideration should be given to an alternative approach of research targeted on specific issues that could lead to the design of action program components that fit the research-based conditions in the basin.	Craig Adams	6/29/2007	Costs to implement the action items included in Section 3 of this GMP will be estimated as implementation is considered. As noted in comment 95, the City is following a proven and methodical approach to collecting defensible data before implementing groundwater resource improvement projects.

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99	Section	Comment	Provided By	Date	Response
99	Section 3 – Management Plan Elements	A consistently used phrase in the "management plan element" of the draft plan is "if contaminant detection occurs (then . . .)". "Response action plans" are needed. But, the priority should be on "action plans to PREVENT contamination." The draft groundwater basin plan makes reference to the laundry list of action options that have been included in the San Dieguito Watershed Management Plan. But, there is no analysis of which of these measures are most appropriate for dealing with groundwater – and groundwater related - problems in the San Pasqual Valley nor much guidance as to how to move ahead on measure that would be effective in the valley.	Craig Adams	6/29/2007	Action Items specific to San Pasqual Groundwater Basin are with each Plan Component Category beginning in Section 3.4 on Page 3-17. The San Pasqual specific action items, developed with input from the PAC, are also provided in a tabular summary in Table 4-1. We must reiterate that the PAC had asked the City of San Diego and our consultant MWH to review and cite the San Dieguito Watershed Management Plan as it relates to groundwater protection to be consist with planning effort pre-dating the development of San Pasqual's GMP.
100	Section 3 – Management Plan Elements	The Conjunctive Use and Brackish Groundwater Desalinization measures appear to be real-action items. It would be helpful to identify want other types of basin management actions would complement these initiatives and insure their maximum and efficient effectiveness. Also, the lack of any cost estimation makes it difficult to assess the feasibility and likelihood of these proposals becoming reality.	Craig Adams	6/29/2007	The City Council has approved projects to evaluate the feasibility and cost of implementing conjunctive use and groundwater desalination. Results of these evaluations will be summarized in the bi-annual groundwater reports.
101	Section 4 – Plan Implementation	Of the 49 "actions" in the table, the vast majority are "more monitory and reporting" or "more planning." The "other-than-monitoring" "actions" that are identified are limited to the conjunctive use and desalinization proposals and to somehow monitoring/commenting on development proposals outside the recharge zone (the significance of which the plan never seriously explores). Can nothing be done within the valley to improve the efficient use of water and to aid in protecting its quality? The idea of promoting the concept of Best Management Practices is raised in the plan but there are no specific "actions" to promote BMP implementation – or to lend guidance as to which measures would be the most cost-effective for the situation in the valley. If Best Management Practices are already being employed to the maximum extent feasible, the draft plan report doesn't document this conclusion.	Craig Adams	6/29/2007	See response to questions 28 and 55.
102	2.2.2.2 Recharge & Extraction of Groundwater	The primary sources of recharge are listed as streamflows, which will increase with invasives removal, especially critical in low-flow years and ephemeral streams.	Leslie Ann Woollenweber	7/6/2007	Comment noted.
103	2.2.3 Groundwater Quality	Native plants have the capacity to improve surface- and groundwater quality by filtering out contaminants. The non-natives that dominate San Pasqual have displaced natives on an alarming scale, as well as increased the potential for flooding, thereby lessening the ability of the native landscape to effectively perform the function of filtering.	Leslie Ann Woollenweber	7/6/2007	Comment noted
104	2.3 Surface Water Conditions	How does the information cited in 1983 compare to percent cover or acres of invasives in that year? The magnitude of the problem with invasives in San Pasqual, mainly Arundo and tamarisk, is such that streamflows and subsurface water would likely be increased by several hundreds to thousands of AFY.	Leslie Ann Woollenweber	7/6/2007	Leslie has provided additional information and a new section (2.5) has been added to the GMP summarizing activities occurring outside the venue of the GMP to characterize and eradicate invasives from the Valley. A map showing the distribution of invasives in the valley as of March 2007 or updates could be included in future bi-annual groundwater reports to document progress made to remove invasives from the Valley.
105	2.4 Water and Land Use	Water use is estimated based on acreage of crop type and evapotranspiration of applied water for different crops and estimates of urban water use from an unpublished MWH report, but admits the figure may be an underestimate. "Water loss" due to consumption by invasives should be added to any estimate of water use, because this is a preventable waste of in-basin and imported water that could be recharging the basin.	Leslie Ann Woollenweber	7/6/2007	Please see response to comment # 104. A more detailed water budget may be developed during the ongoing or future study of groundwater improvement projects in the basin, but will not be included in the GMP.
106	2.4.1 Land Use	Does the statement that "Native vegetation accounts for almost half of the land within the basin" and "native riparian vegetation...between 6.6 percent and 8.5 percent" erroneously include invasive non-native vegetation in the category of "native"? Non-native cover is not separately categorized in this section and clearly does not fit into any of the categories listed. This breakdown should include the current (2007) data on mapped invasives.	Leslie Ann Woollenweber	7/6/2007	Please see response to comment # 104
107	Table 2-2 – Estimated Water Budget Components	The "Streambed Infiltration" and "Subsurface Inflow from Tributaries" components of the Water Budget (and perhaps even "Deep Percolation of Precipitation") are likely an overestimate if the percent cover of non-natives has not been taken into account.	Leslie Ann Woollenweber	7/6/2007	Please see response to comment # 104 and #105

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	Section	Comment	Provided By	Date	Response
108	2.4.2.1.1 Inputs	Cites estimates of recharge from creeks of "more than 80% of the total recharge" and "3,000 acre-ft". Either is, again (see Table 2-2 comment), likely to be an overestimate if the impact of invasives is not taken into account, since major infestations exist in/near streambeds. Table 2-2 comment also applies to discussion of deep percolation and subsurface inflows.	Leslie Ann Woollenweber	7/6/2007	Please see response to comment # 104 and #105
109	2.4.2.1.2 Outputs	Again cites the figure of estimated water use given in Section 2.4, here, in the context of outputs but does not mention "water loss" due to invasives.	Leslie Ann Woollenweber	7/6/2007	Please see response to comment # 104 and #105
110	Figure 2-11 – San Pasqual Valley Land Use	What is the acreage of each crop type (and total)?	Leslie Ann Woollenweber	7/6/2007	A table has been added to Section 2 listing land uses and associated acreages.
111	Table 3-1 – PAC Identified Issues or Concerns	Cites exotic plants removal as a Groundwater Sustainability issue/concern but says this is "not purview of MP" (presumably Management Plan?). Is this because the GMP believes it has no authority to oversee such a program or that the issue is being/should be addressed by someone else? If so, by whom? Over 1,000 acres of non-natives have been mapped across the watershed. The area of heaviest infestation by far is in San Pasqual Valley, and this infestation is dominated by Arundo and tamarisk. Both these species take up enormous amounts of water; the tendency of Arundo to grow in mats particularly increases flooding, which increases flow and lessens the opportunity for infiltration and percolation into groundwater stores.	Leslie Ann Woollenweber	7/6/2007	Please see response to comment # 104 and #105
112	3.6.3 Protection of Recharge Areas	States "natural recharge rates can be maintained by keeping the major recharge areas free of impervious surfaces" when invasives control and elimination will have a far greater impact (especially given the lack or likelihood of development in this agricultural area, a designation which is supposed to be maintained with the San Pasqual Vision Plan). Surface spreading won't have the desired effect if the areas chosen are infested with invasives, notably Arundo and tamarisk. The areas suggested are "Tujunga Sands... just south of the Ysabel creek" and "other areas along or near natural streams" – most of the areas along or near streams in the basin are heavily infested with non-natives.	Leslie Ann Woollenweber	7/6/2007	Please see response to comment # 104 and #105