



THE CITY OF SAN DIEGO



March 29, 2012

Electronic Submission: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

The City of San Diego, Public Utilities Department is pleased to provide the State Water Resources Control Board (State Water Board) with comments on the proposed "Statewide Mercury Policy and Mercury Control Program for Reservoirs."

The Public Utilities Department operates a complex water supply system serving drinking water to 1.3 million people in the City of San Diego and neighboring communities. The Public Utilities Department owns and operates nine drinking water supply reservoirs in San Diego County, including Lake Hodges, which is a section 303(d) listed impaired water body for mercury. We understand that the policy is still developing, and we hope that the State Water Board will take into consideration the uniqueness of individual regions and local municipality agency needs when continuing to develop this policy. With that in mind, we respectfully submit our comments and concerns below on the proposed policy:

Impacts of proposed implementation actions related to reservoir management

In the available scoping document the State Water Board has outlined several possible implementation actions that could be required of reservoir managers. It has been established that impoundments like reservoirs retain sediments that may contain mercury as an unintended consequence of their design. Furthermore, the typical limnology of these reservoirs lends to the production of methylmercury – the bioavailable speciation of mercury. However, not much science has been developed that shows reservoir management is actually an effective tool in reducing mercury levels in watersheds. It is our opinion that the absolute best management practice is to prevent mercury from entering a reservoir from upland sources and aerial deposition. This reality should be made clear in the development of any further policy documents.



Water Operations Branch

Public Utilities Department • 2797 Caminito Chollas • San Diego, CA 92105-5097

Tel (619) 527-7470 Fax (619) 527-8098



Page 2

Ms. Jeanine Townsend

March 29, 2012

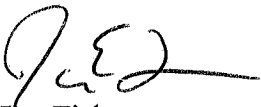
Many of the implementation measures for reservoir management included in the available documentation are already being implemented in most reservoirs around the state. However, we have major concerns with the potential implementation action contained on page three of the scoping document that states as follows: "Where possible, modification of water storage and discharge patterns to reduce methylmercury production."

Reservoirs in the City of San Diego system are unique in that they are hydraulically disconnected from the streams below their dams. No water is discharged from the dams. Water stored in the reservoirs does not support any beneficial uses downstream. Although these reservoirs have been designated for several beneficial uses in the San Diego Region's Water Quality Control Plan, the most essential use is providing drinking source water to the region. Implementation actions involving changes in the way water is stored or used in reservoirs would have a significant negative effect on the Public Utilities Department's operations. In turn, that would reduce the ability of the Public Utilities Department to provide safe and reliable water to homes and businesses in San Diego. Therefore, any requirements for modification of storage operations would not be appropriate.

We oppose any requirements that would limit or strip the control of reservoir operation from the agencies that have the best working knowledge of the systems they own. We request that this proposed implementation measure be removed as it has the potential for serious negative effects on the ability of a water utility to provide safe and reliable public water supply.

We appreciate the opportunity to comment on the proposed policy. If you have any further questions please contact Peter Martin, Jr. at (619) 533-4157 or pdmartin@sandiego.gov

Sincerely,



Jim Fisher

Assistant Public Utilities Director

PM/ah