Lake Cuyamaca RECREATION AND PARK DISTRICT

August 2, 2006

Mr. John H. Robertus
Executive Officer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340

Re: Status Report
Order No. R9-2004-0015
Lake Cuyamaca Recreation and Park District Septic Tank/Leach Field System
SCR: 07-0097 01

Dear Mr. Robertus:

This letter provides a status report on activities related to the Lake Cuyamaca Recreation and Park District (District) septic tank/leach field system.

Background. Regional Board Order No. R9-2004-0015 establishes requirements for the proposed discharge of effluent to a septic tank/leach field system near Lake Cuyamaca. The septic tank/leach field system would serve District facilities at Lake Cuyamaca, which include a restaurant, campground restrooms, and a fish cleaning station. The proposed discharge site is located within the Cuyamaca Hydrologic Subarea (HSA 907.43).

Groundwater Monitoring: The District has continued to collect and test groundwater samples in three shallow monitoring installed in the vicinity of the leach field. The wells were constructed to provide background water quality data and to verify compliance with effluent limitations

When the testing first began in October 2004, three constituents (nitrate, iron and manganese) were found to exceed the Basin Plan objectives in all three wells. Testing over the last year has indicated iron and manganese concentrations have dropped below the objectives in two of the three wells, including the proposed compliance well. Nitrate levels dropped below the objective

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in the background well (located upstream from the discharge system) but remained above the objective in the other two wells.

The water quality samples are indicating local groundwater quality continues to exceed the Basin Plan objective for nitrate (5 mg/l) in the proposed compliance well. The nitrate levels in the background well have recently increased (June and July 2006 samples) and are now above the objective.

A request was submitted to the Regional Board staff in December 2005 to extend two of the compliance wells, including the compliance monitoring well, to a greater depth. A review of existing groundwater data conducted during the preparation of the Report of Waste Discharge indicated nitrate levels are below the objective in water quality samples obtained in deeper wells; a deeper well is thought to be appropriate to verify the presence of assimilative capacity in the groundwater basin. The request was denied by staff in February 2006.

Discussions with Regional Board staff have continued in an effort to seek concurrence that a deeper well will provide appropriate documentation of available assimilative capacity and compliance with the Basin Plan by confirming groundwater objectives are not caused to be exceeded as a result of the discharge

Wastewater System Operations: The district continues to provide wastewater collection services for Lake Cuyamaca facilities that include a public rest room, restaurant, tackle shop, fish cleaning station, district office and camp ground rest rooms. Wastewater collected in three holding tanks is trucked to a disposal site and land applied in accordance with Order No. 92-028 issued by the California Regional Water Quality Control Board, Colorado River Basin Region. Solids are periodically trucked to the Metropolitan Wastewater system in San Diego.

The disposal site is now owned by the State of California Parks Department. The district has an agreement for the continued use of the site that requires a monthly payment of $1350 for such use. The agreement can be canceled by the State of California at any time. Should it be canceled, the district would be forced to haul wastewater over 50 miles to a community sewer system located in eastern San Diego County.

Pursuit of Other Options: The district has evaluated other options including the installation of onsite treatment facilities and the development of a site at an alternative location. A summary of each follows:

Onsite Treatment: A search of available treatment technologies resulted in the identification of a treatment process combination that treatment vendors claim can provide sufficient treatment to produce effluent meeting the Basin Plan objective for nitrate. Discussions were held with treatment company representatives and a draft proposal was presented to the district. The goal of

the facilities would be to meet nitrate limitations prior to discharge into the leach field system There are two important concerns with this option:

- A preliminary cost estimate of $500,000 subject to adjustment as more information is developed.
- The treatment companies have not provided evidence that the treatment processes have actually met the 5 mg/l nitrate limitation in operating systems.

Alternative Site: Construction disposal facilities at an alternative site have been reviewed and found not to be feasible Consideration was given to installing a disposal system within the nearby Colorado River Basin Region Regional Board jurisdiction. An available site with acceptable vehicle access has not been found.

Wastewater Flow Changes: The number of visitors in the Lake Cuyamaca area dropped significantly after the 2003 Cedar fire. Wastewater flows were reduced by a corresponding amount and continue to be lower than reported in the Report of Waste Discharge (an average of approximately 2500 gallons per day)

The number of visitors has returned to pre-Cedar fire levels; however the flows remain well below the previous levels. There appear to be two reasons for the reduced wastewater flows.

1. Order No. R9-2004-0015 prohibits the discharge of recreation vehicle holding tank wastes into the district facilities and that provision has been implemented by the district.
2. Water saving devices have been installed in the district facilities.

The result of these two actions has reduced wastewater flows to approximately 1600 gallons per day. Peak holiday flows have also been reduced from previous highs of up to 8,000 gallons per day to a maximum of 4,000 gallons per day.

Thank you for your continued assistance as we work toward achieving our goal of providing a long term environmentally safe wastewater disposal project for the Lake Cuyamaca Recreation and Park District facilities.

Sincerely,

for Thomas H. Chapman
Chairman

cc Mark Weston, General Manager, Helix Water District
Matt A. Tebbetts, Kennedy/Jenks Consultants