

From: Betsy Cawn <epi-center@sbcglobal.net>
To: <byee@waterboards.ca.gov>
Date: 8/29/2011 11:23 AM
Subject: Sacramento River Basin Plan Triennial Review

Dear Ms. Yee,

I do not know if these questions are technically appropriate for the public comments on the Triennial Review of the Sacramento River Basin Plan, or not, but I would like to know the answers, in any case. If these questions are relevant to the Triennial Review process, please include them.

In 2006, the Central Valley Regional Water Quality Control Board adopted Resolution No. 2006-0060, amending the Sacramento River Basin Plan for the "control of nutrients" in Clear Lake, establishing a TMDL of 73 micrograms per liter of Chlorophyll-a, based on a technical study performed in 2002 by Tetra Tech.

The County of Lake (Department of Public Works) disputed the validity of that TMDL, on the basis that the lake had been getting "clearer" (according to Secchi disc depth measurements, and because of the lack of "reported" blue-green algal blooms) since 1992.

In 2009, 2010, and 2011, however, the lake has produce prodigious amounts of blue-green algal/cyanobacterial blooms, resulting in tremendous loss of "clarity," and causing some local concerns about the health and safety of the lake for swimming and for raw water supplies to drinking water purveyors.

There are 17 domestic water suppliers in communities around Clear Lake (including the County of Lake's "Special Districts" which provides 7 of 10 Community Service Areas with treated lake water) who participate in daily monitoring of water quality for compliance with the Safe Drinking Water Act requirements mandated by the California Department of Public Health. These water suppliers measure "turbidity" on a nearly constant basis. Would it be possible to use their monitoring data as a reasonable measurement of lake water quality for purposes of the TMDL metric?

In his peer review comments on the Tetra Tech report of 2002, Dr. Vladimir Novotny noted (in 2004) the absence of a Use Attainability Analysis prior to the determination of the original TMDL, and the lack of baseline data to establish the relevance of the accepted TMDL. Is it too late to seek such an analysis, and consider revision of the nutrient TMDL for Clear Lake if that analysis recommends it?

Finally, there is some indication that our last three years' manifestation of blue-green algal blooms may be contributing cyanobacterial toxins to our recreational and drinking water supply. The known hazards of cyanobacterial toxins found in the Klamath River reservoirs generated a TMDL for Microcystis formulated by a cooperative effort between the US EPA Region 9 and the North Coast Regional Water Quality Control Board, along with local agencies and tribes. Is there any way your board can assist the County of Lake and members of the public who are concerned about the health of Clear Lake to develop appropriate testing and health information in this regard?

Respectfully submitted,

Betsy Cawn
Essential Public Information Center
Upper Lake, CA
707-275-9376
epi-center@sbcglobal.net