

**Regional Water Quality Control Board
Central Valley Region
Board Meeting –16/17 April 2015**

**RESPONSE TO WRITTEN COMMENTS ON
A BASIN PLAN AMENDMENT TO REMOVE THE MUNICIPAL AND DOMESTIC
SUPPLY (MUN) BENEFICIAL USE IN TWELVE CONSTRUCTED AND/OR MODIFIED
WATER BODIES IN THE SACRAMENTO RIVER BASIN THAT RECEIVE TREATED
MUNICIPAL WASTEWATER FROM THE CITIES OF BIGGS, COLUSA, LIVE OAK OR
WILLOWS**

At a public hearing scheduled for 16 and 17 April 2015, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adoption of an amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (“Basin Plan”) that would de-designate the MUN beneficial use in twelve constructed and/or modified water bodies. The rationale for de-designating these water bodies can be found in Exception 2b contained in State Water Board Resolution No. 88-63, the *Sources of Drinking Water Policy*.

The Central Valley Water Board provided interested parties the opportunity to submit written comments on the proposed Basin Plan Amendment and draft Staff Report from 5 January 2015 to 20 February 2015. Board staff also conducted a public stakeholder meeting on 14 January 2015 in Rancho Cordova, and the Central Valley Water Board conducted a public hearing to receive oral comments on 6 February 2015. This document contains responses to written and oral comments submitted to Central Valley Water Board staff during this period.

This “Response to Comments” is organized into three sections. Section 1 addresses broad issues identified during the 14 January 2015 stakeholder meeting and submitted in written comment letters. Section 2 addresses specific written comments, primarily pertaining to the main body of the draft Staff Report or Appendix D, the Environmental Checklist. Section 3 addresses specific comments/corrections to Appendix B, Lower Sacramento River Basin Water Quality Monitoring Summary.

Written comments were received by:

Name, Title Organization (Submittal Date)	Broad Issues	Staff Report/ General Comments	Appendix B
Ms. Roberta Firoved, Industry Affairs Manager California Rice Commission (February 20, 2015)		X	X
Ms. Cindy Paulson, Ph.D., Executive Director California Urban Water Agencies (February 20, 2015)	X	X	
Ms. Debbie Webster, Executive Officer Central Valley Clean Water Association (February 20, 2015)		X	
Ms. Sherill Huun, Supervising Engineer City of Sacramento Department of Utilities (February 20, 2015)	X	X	X
Mr. Jacob Westra, Assistant General Manager Tulare Lake Basin Water Storage District and Mr. Dustin Fuller, Manager Tulare Lake Drainage District (February 18, 2015)		X	

SECTION 1: BROAD ISSUES

Several commenters raised two general concerns in written submittals and/or orally at the stakeholder meeting:

General Comment No. 1: Stakeholders requested that Board staff clarify how existing regulatory processes in the Central Valley Water Board programs would ensure the protection of water bodies downstream of the water bodies that where the MUN beneficial use would be de-designated.

RESPONSE: The Basin Plan and existing regulations require the Board to implement several regulatory processes that will ensure that beneficial uses will be protected downstream of the water bodies where the MUN beneficial use is proposed to be de-designated. These include:

Antidegradation Analysis: State Water Board Resolution 68-16, the Statement of Policy with Respect to Maintaining High Quality of Waters in California (*State Anti-Degradation Policy*) applies to both the Central Valley Water Board's permitting and basin planning activities. The *State Anti-Degradation Policy* requires that the Board conduct an anti-degradation analysis and make certain findings when the Board is authorizing the degradation of high-quality water, which includes any waters where the water quality is more than sufficient to support the designated beneficial uses. As a part of that an anti-degradation analysis, the Board must ensure that no pollution will occur (including in downstream water bodies), that the discharger will implementing best practicable treatment or control of the discharge, and that any degradation will be consistent with the maximum benefit to the people of the State – including those people that depend on a downstream water body for their drinking water.

Existing Permitting Schemes: In the twelve water bodies that are the subject of the proposed Basin Plan Amendment, there are two categories of dischargers that the Board is regulating under existing regulatory programs.

Dischargers Regulated under a Federal Clean Water Act NPDES Permit: The Board is required to ensure that discharges regulated by the National Pollutant Discharge Elimination System (NPDES) permits do not result in impairments of applicable water quality standards. (40 C.F.R. § 122.44.) If a pollutant in a discharge exhibits a “reasonable potential” to cause excursions above applicable water quality criteria, the Board must set effluent limitations to regulate that pollutant. The process by which the Board determines whether or not a discharge has a reasonable potential to cause or contribute to a violation of water quality standards is called a reasonable potential analysis (RPA). This RPA process is not limited in scope to the receiving water; if available evidence indicates that pollutant concentrations may cause violations of water quality standards downstream of the discharge, the Board will impose limitations or permit conditions to ensure that these pollutants are controlled.

NPDES Permits are reviewed approximately every five years. Dischargers are required at least once during their permit term (and often more frequently) to monitor effluent and upstream receiving water sites for priority pollutants and other constituents of concern. If an NPDES permittee predicts that there will be a substantial change in or expansion of its wastewater discharge, the permittee must submit a new report of waste discharge to the Board and the Board must conduct a new antidegradation analysis and potentially a new RPA before the Board can issue a new permit. Any new point-source discharges to any one of

the twelve water bodies in this amendment must also go through the same anti-degradation and RPA analyses as those required of the four existing POTWs.

Dischargers Regulated under Irrigated Lands Regulatory Program WDRs: The Central Valley Water Board initiated the Irrigated Lands Regulatory Program (ILRP) in 2003 to ensure that runoff from irrigated agricultural acreage does not impair surface water. The Board subsequently broadened the ILRP to address groundwater. Under the WDRs that the Board has issued, third-party coalitions (representatives of agricultural growers), including the Sacramento Valley Water Quality Coalition and the California Rice Commission, develop regional water quality management plans for areas where irrigated agriculture may be contributing to water quality problems. The WDRs require growers to conduct evaluations of their management practices to ensure they are protecting groundwater and surface water, and require coordinated monitoring to ensure the continued protection of beneficial uses in both the receiving water and in downstream water bodies that may be threatened by agricultural discharges.

Periodic Surface Water Quality Assessments and Planning under Sections 303(d) and 305(b) of the federal Clean Water Act: Section 305(b) of the federal Clean Water Act and the associated federal regulations require the State of California report biennially to the USEPA on the water quality conditions of its surface waters. The USEPA then compiles these assessments into their biennial “National Water Quality Inventory Report” to Congress. Under Section 303(d) of the federal Clean Water Act, states must identify water bodies that do not meet water quality standards (i.e. they exceed water quality objectives considered protective of beneficial uses). These waters are placed on the List of Water Quality Limited Segments (or List of Impaired Water Bodies). The list identifies the pollutant or stressor causing impairment and establishes a schedule for developing a control plan to address the impairment. Placement on this list generally triggers development of a Total Maximum Daily Load (TMDL) and associated pollution control plans (PCP) for each water body and associated pollutant/stressor on the list. California has integrated the 303(d) List of Impaired Waters and the 305(b) Water Quality Assessment Report into a single report (Integrated Report).

General Comment No. 2: Stakeholders wanted Board staff to justify how existing monitoring programs would be sufficient to detect water quality changes that may result from the de-designation of the MUN beneficial use in the twelve water bodies, and how these monitoring programs would be sufficient to ensure the protection of MUN source water in the Sacramento River.

RESPONSE: *Sources of Drinking Water Policy* Exception 2b requires that discharges from de-designated water bodies be monitored to ensure compliance with all applicable water quality objectives. The *Sources of Drinking Water Policy* is silent on the means by which the Regional Boards make sure that monitoring is conducted, which grants the Regional Boards a considerable amount of discretion in determining what type of monitoring is sufficient to fulfill this requirement.

In this case, the dischargers that discharge wastewater into the twelve water bodies where the MUN use will be de-designated have been extensively monitoring their discharges for many years. In addition, the water quality in the Colusa Basin Drain and the Sutter Bypass, which best represent the integrated water quality downstream of the twelve water bodies, has been extensively monitored, as has water quality in the Sacramento River; these monitoring efforts will continue into the foreseeable future. Furthermore, the changes that are expected to occur as a result of the proposed de-

designation are expected to be de minimis; the regulatory requirements of the ILRP are not expected to change, and the pollutant concentrations in the effluent from the four affected POTWs are not expected to increase (these POTWs are currently under time schedules that have allowed the POTWs to discharge pollutant concentrations that reflect their current performance).

Appendix B in the Staff Report includes an extensive summary of monitoring programs downstream of the twelve water bodies in the Colusa Basin Drain and the Sutter Bypass (neither or of which is designated as supporting the MUN beneficial use). Central Valley Water Board staff did not find any significant data gaps in the monitoring conducted in the by existing programs, primarily the ongoing Irrigated Lands Regulatory Program and the Surface Water Ambient Monitoring Program (SWAMP). Going one step further, since both the Colusa Basin Drain and the Sutter Bypass discharge into the Sacramento River (which is designated as supporting the MUN beneficial use), the Staff Report also included an analysis of additional monitoring continuing down the Sacramento River. Appendix B in the Staff Report demonstrates that there is extensive monitoring of the main stem Sacramento River to the Delta, which includes 23 different monitoring efforts that assess a wide variety of water quality constituents.

Pursuant to the NPDES Program requirements, the Board will continue to mandate that the four Sacramento-area POTWs affected by the proposed amendment (Cities of Biggs, Colusa, Live Oak and Willows) and any other point-source discharges bodies continue to monitoring receiving water quality. Water quality monitoring will continue as regulated by the ILRP WDRs in the Sacramento River Basin, utilizing water quality triggers for the development of Management Plans. Efforts will continue through ILRP to fill data gaps, determine the effectiveness of management practices, and track water quality trends to ensure that irrigated agriculture is not contributing to a water quality problem that is impacting beneficial uses. Monitoring for the Surface Water Ambient Monitoring Program (SWAMP) will continue to focus on the overall quality of California's surface waters, water quality trends, identification of problem or risk areas, causes and sources of water quality problems and the effectiveness of clean water projects and programs.

Even if these monitoring programs change somewhat in the coming years, there is no indication that the Board would be required to establish additional monitoring efforts to ensure that applicable water quality objectives are met in downstream water bodies; nothing in the current review indicates that a change in discharge quality from the twelve water bodies would not quickly be identified and mitigated.

SECTION 2 – RESPONSES TO WRITTEN COMMENT LETTERS

This section contains Board staff responses to individual comment letters received during the comment period.

CALIFORNIA RICE COMMISSION COMMENTS

Comments were received from Ms. Roberta Firoved, Industry Affairs Manager, California Rice Commission on 20 February 2015.

California Rice Commission Comment No. 1: On Page 43 the Staff Report mentions the twelve water bodies and states that the types of crops should stay the same. In reality, permanent tree crops are expanding in this area

RESPONSE: Permanent tree crops are an existing crop type in the Sacramento Valley. While tree crops have expanded in recent years across the entire Central Valley, fluctuations in the proportion of different existing crops is to be expected due to a number of factors such as economic and climate conditions (i.e. current drought conditions may slow the expansion of tree crops). The staff report was updated to clarify this sentence as follows:

Irrigated lands are not expected to expand in this area and the types of crops are expected to stay relatively the same, although fluctuations in the proportion of different existing crops are to be expected.

California Rice Commission Comment No. 2: Clarification would be helpful with the final intent of these statements (Re: Future Cumulative Impacts Analysis on Page 43)

RESPONSE: Additional clarification was added to the Staff Report Section 7.1.4 as requested.

California Rice Commission Comment No. 3: We are not seeking to increase the monitoring requirements for the Rice WDR.

RESPONSE: The proposed Basin Plan Amendment does not require any increased monitoring requirements for the Rice WDR administered by the Irrigated Lands Regulatory Program.

CENTRAL VALLEY CLEAN WATER ASSOCIATION COMMENTS

Comments were received from Ms. Debbie Webster, Executive Officer, Central Valley Clean Water Association on 20 February 2015, expressing support for the proposed Basin Plan Amendment.

RESPONSE: Central Valley Water Board staff appreciates CVCWA's support of the proposed Basin Plan and participation in the stakeholder process.

CVCWA Comment No. 1: We offer one specific clarifying comment on the Draft Staff report as follows: Page 31, Section 6.1.3, Second paragraph, first sentence: We suggest substituting the word "increases" for the word "changes", adding the word "individual" prior to the words "point source discharges", and adding the words "beyond those authorized in existing NPDES permits" after the word "future." These changes are suggested to provide greater clarity to the application of the antidegradation policy in future NPDES permits.

RESPONSE: Central Valley Water Board staff concurs with these edits and updates were made to the Staff Report.

CITY OF SACRAMENTO, DEPARTMENT OF UTILITIES COMMENTS

Comments were received from Ms. Sherill Huun, Supervising Engineer, City of Sacramento, Department of Utilities on 20 February 2015.

City of Sacramento Comment No. 1: Based on our review of the available data, we do not anticipate that the current discharges from the Publically Owned Treatment Works (POTWs) in the four case study areas included in this Basin Plan Amendment will result in significant impacts to the Sacramento River source water quality.

RESPONSE: Central Valley Water Board staff agrees.

City of Sacramento Comment No. 2 (Anti-Degradation): We request that additions be made to the Staff Report to explain how the ILRP will continue to ensure protection of downstream source water quality after the de-designations are in place.

RESPONSE: Additional clarification was added to the Staff Report Section 6.1.3 as requested.

City of Sacramento Comment No. 3 (Anti-Degradation): We request that the Reasonable Potential Analysis (RPA) defined in Section 1.3 of the State Implementation Plan be reviewed to ensure that it specifically requires any future discharges to these de-designated water bodies to include evaluation for protection of MUN in the next downstream MUN designated water body. We further note that such future RPAs should also be required to include a complete cumulative effects analysis (as part of CEQA compliance) for that next downstream water body, and identify other de-designations that have occurred, to ensure that all impacts are being quantified over time, regardless of whether previous RPAs were determined to be de minimis. This would need to be a water body specific assessment.

RESPONSE: The State Implementation Plan states that, “[t]he RWQCB shall use all available, valid, relevant, representative information, as described in section 1.2, to determine whether a discharge may: (1) cause, (2) have a reasonable potential to cause, or (3) contribute to an excursion above any applicable priority pollutant criterion or objective.” The language of the State Implementation Plan does not limit the analysis to solely the water body that receives the discharge.

The Board recognizes that any potential increase in pollutant loading due to the removal of MUN protections should receive regulatory scrutiny, whether or not the Board’s permitting action is subject to CEQA (the Board’s issuance of NPDES Permits is statutorily exempt from CEQA). Even if the Board is not required to conduct a CEQA analysis, the type of analysis suggested by the commenter will be conducted pursuant to the *State Anti-Degradation Policy* as outlined above (see RESPONSE Section 1, Comment No. 1). Furthermore, if a local agency is undertaking a discretionary approval of a project (such as the approval of a wastewater treatment plant expansion) that may result in water quality impacts either directly in the receiving water or downstream, the Board will be consulted as a responsible agency pursuant to CEQA and will ensure that mitigation measures are imposed to ensure that the project does not result in unreasonable impacts to any applicable beneficial use.

City of Sacramento Comment No. 4 (Anti-Degradation): We request that the Regional Board provide clarifications to support the MUN feasibility statement and consider specific requirements for RPA for future discharges to protect downstream MUN beneficial uses.

RESPONSE: See response to Issue 1 in Section 1. RPAs have specific requirements that include evaluating downstream beneficial uses.

City of Sacramento Comment No. 5 (Cumulative Impacts Analysis): The text discusses impacts of agriculture discharges in the future, stating on page 43 that since agricultural operations will be regulated to protect beneficial uses they would not cumulatively contribute to adverse water quality conditions in the receiving waters.

We request board staff to clarify how agricultural operations will continue to be regulated to protect the downstream MUN beneficial uses after the receiving waters for the ILRP discharges are de-designated, to ensure that there are not cumulative impacts.

RESPONSE: The water quality coalitions that implement the ILRP WDRs are required to develop regional monitoring to ensure that agriculture does not cause adverse water

quality impacts. Additional clarification was added to the Staff Report Section 7.1.4 to explain that the de-designation of the MUN beneficial use from the twelve water bodies is not expected to significantly change water quality in either the Colusa Basin Drain or the Sutter Bypass, both of which are regularly monitored by the ILRP.

City of Sacramento Comment No. 6 (Peer Review Justification): We request that the Monitoring and Surveillance Element be provided a comprehensive peer review and that data gaps be identified and addressed.

RESPONSE: Staff has determined that the proposed Basin Plan Amendment does not contain new science that would require an external peer review under Health and Safety Code section 57004. The *Sources of Drinking Water Policy* Exception 2b requires the monitoring of discharges to ensure compliance with all relevant water quality objectives; the response to Section 1, Comment No. 2 explains why existing monitoring efforts are sufficient to ensure compliance. Staff evaluated readily available monitoring data such as site information, constituent, and frequency from existing monitoring programs to conduct an evaluation of current monitoring and surveillance activities. The staff recommended monitoring and surveillance option to fulfill the Exception 2b requirement in the proposed Basin Plan Amendment is for the Board to continue reliance on existing monitoring programs, such as those implemented through ILRP, SWAMP, and NPDES. These individual programs regularly evaluate water quality data to determine compliance with program objectives, including protection of beneficial uses. In addition, as part of Section 303(d) and Section 305(b) of the federal Clean Water Act, water quality information is periodically compiled as part of the California Integrated Report to assess overall surface water quality.

City of Sacramento Comment No. 7: We respectfully request that the Regional Board further review the monitoring conducted by other existing monitoring programs to ensure that there is appropriate monitoring in place to support the MUN de-designations. We note that the monitoring programs listed may change or adapt in the future for the goals of their respective programs and there could also be changes in monitoring data availability for some of the programs listed due to funding constraints.

RESPONSE: Again, please see the response to Section 1, Comment No. 2 and the response to City of Sacramento Comment No. 6, above.

City of Sacramento Comment No. 8: We request that the Regional Board review the data provided under Section 3 below to reconsider the availability of data relevant to the MUN beneficial use and reconsider the proposed implementation plan to provide sufficient data.

RESPONSE: Staff reviewed the data provided in Section 3. However, Board staff maintains that the sufficient data has been and will be collected to satisfy *Sources of Drinking Water Policy* Exception 2b for these twelve water bodies.

City of Sacramento Comment No. 9 (Basin Plan Chapter IV): We continue to recommend that the text be expanded to specifically clarify that only one exception needs to be met, and that the water bodies have been approved as part of the BPA process. "...for Resolution 88-63 exceptions and Appendix 44 for water bodies that meet one of the exceptions and have been approved through the Basin Plan Amendment process"

RESPONSE: Proposed language was updated to "...for Resolution 88-63 exceptions and Appendix 44 for water bodies that meet one or more of the exceptions."

City of Sacramento Comment No. 10 (Basin Plan Chapter V): It is unclear how this language addresses the requirements of the proposed Basin Plan Amendment. The *Sources of Drinking*

Water Policy requires that downstream MUN be protected by a monitoring program to assure compliance. The proposed Basin Plan Amendment does not include any new monitoring or assessment directly related to the de-designations. Although the goal of improving information gathering and assessment expressed in the proposed changes is an important one, this does not provide a guarantee of that evaluation occurring. We request that this language be reconsidered, as adding goals to the Basin Plan without a specific mechanism for implementation may result in unintended impacts.

RESPONSE: Please see response to Issue No. 1 in Section 1 and response to City of Sacramento's Comment No.6. The commenter is correct that in certain circumstances the Board might need to establish a new monitoring and reporting program when de-designating the MUN beneficial use pursuant to an exception in the *Sources of Drinking Water Policy*. However, as explained above, the Board has a significant amount of information describing the past water quality in the water bodies that are proposed for de-designation and the water bodies that are downstream of those water bodies, the effects of the de-designation in these twelve water bodies is de minimis, and there are numerous existing water quality programs that must continue into the foreseeable future and that will allow the Board to regularly conduct assessments to ensure that beneficial uses are protected in all downstream water bodies.

The proposed language for the Basin Plan nonetheless encourages water quality data integration to ensure that Board staff will be able to more efficiently compile and assess available information, because the current process takes considerable internal staff coordination and resources. While a statement in the Basin Plan may not offer a guarantee, it will demonstrate the Central Valley Water Board's support and high prioritization for efforts to facilitate coordinated collection and evaluation of water quality data.

City of Sacramento Comment No. 11 (Evaluation of Project Alternatives): We request that it be expanded to accurately reflect the policy requirement, "Monitoring discharge to assure compliance with all relevant water quality objectives downstream"

RESPONSE: Staff Report updated as follows: "Assure compliance with all relevant water quality objectives downstream, including the monitoring of discharge."

City of Sacramento Comment No. 12 (Recommended Alternative): Use of Exception 2b in the *Sources of Drinking Water Policy* requires ~~downstream~~ discharge monitoring... We request that the recommended alternative provide for monitoring upstream of the downstream MUN beneficial uses in locations that would support any necessary follow-up if there are future degradation issues related to the MUN de-designations.

RESPONSE: Staff Report updated to reflect change from downstream to discharge. Water from the twelve water bodies proposed for MUN de-designation flows into either the Sutter Bypass or the Colusa Basin Drain. *Sources of Drinking Water Policy* Exception 2b only requires that the discharge of the de-designated systems be monitored, best represented in this case by integrated water quality downstream in the Colusa Basin Drain and Sutter Bypass. The monitoring sites in these water bodies are located upstream of MUN beneficial uses (Sacramento River). See answers in Section 1 for more information regarding the protection of downstream beneficial uses.

City of Sacramento Comment No. 13 (Resolution No. 88-63): We request that this section be expanded to further describe how this specific element of the exception has been met.

RESPONSE: Staff Report has been updated to clarify how the proposed Basin Plan Amendment is consistent with the *Sources of Drinking Water Policy*.

City of Sacramento Comment No. 14 (Environmental Checklist, Hydrology and Water Quality):

- a. The environmental review should include the potential for new discharges and how water quality impacts would be mitigated.
- b. We request that the explanation in the checklist document address how any changes in water quality from existing discharges besides the POTWs would be mitigated.

RESPONSE: Staff Report updated to provide more clarification. Also see responses to issues 1 and 2 in Section 1.

City of Sacramento Comment No. 15 (Environmental Checklist, Utilities and Service System): Item b shows “No Impact” regarding construction of new or expansion of water treatment facilities. We request that the current proposed BPA address cumulative impacts in light of the upcoming region-wide de-designation BPA.

RESPONSE: Unlike the twelve water body BPA currently before the Board for adoption, several key components related to the scope of the Region-wide MUN Evaluation Process Basin Plan Amendment remain as yet undefined. For example, the Region-wide MUN Evaluation Process Basin Plan Amendment has not settled on a definition of which water bodies will potentially be affected, nor has that effort determined what additional implementation provisions are needed to ensure that any de-designations do not result in adverse water quality impacts to water bodies that will continue to support the MUN beneficial use. Though it is speculative to conclude what future determinations will be made in the course of the development of the region-wide strategy, Board staff have nonetheless augmented the Cumulative Impacts discussion in the Substitute Environmental Document to explain the context in which the proposed Basin Plan Amendment has been developed. Furthermore, a separate CEQA Checklist and Environmental Analysis will be developed as part of the Region-wide MUN Evaluation Process Basin Plan Amendment as well as a cumulative impact analysis.

City of Sacramento Comment No. 16 (Mandatory Findings of Significance): We request further evaluation in the environmental checklist due to the potential for “cumulatively considerable” impacts in combination with the envisioned second BPA for a region-wide process for MUN de-designation of agriculturally dominated water bodies (which certainly qualifies as a probable future project). Changes in water quality have the potential to increase human health risk and water treatment costs.

RESPONSE: Board staff recognize that it is reasonably likely that the Board may find that adopting a Basin Plan Amendment that would implement a region-wide strategy to de-designate potentially over 6,000 constructed and/or modified water bodies could have cumulatively significant impacts. However, simply because the proposed Basin Plan Amendment, which will de-designate the MUN beneficial use in twelve water bodies is a small part of that larger effort does not automatically compel the Board to conclude that there will be cumulatively considerable impacts due to the adoption of this Basin Plan Amendment. While information from this Basin Plan Amendment will likely support methods for categorizing different agriculturally dominated water bodies with like characteristics, staff recognizes that a full environmental review including a cumulative impact analysis will be necessary for any region-wide evaluation process that may lead to de-designations. Water bodies encompassed by this Basin Plan Amendment represent less than 0.2% of the total number of water bodies that may be considered and less than 0.4% of total miles. Cumulative changes from the de-designation in the current twelve water bodies were determined to be less than significant.

City of Sacramento Comment No. 17 (Discussion page 21, 2nd full paragraph): the discussion provides good coverage for the POTWs, but does not sufficiently address agricultural discharges. We request that this discussion be expanded to address agricultural discharges.

RESPONSE: Updated Staff Report to provide more clarification on agricultural discharges in this section (page 151).

City of Sacramento Comment No. 18 (Sufficiency of Data): We request that Board staff reconsider the availability of sufficient data to assess the downstream MUN beneficial use and identify a program-specific mechanism that will integrate the various data sources into an evaluation to assure compliance with the State Drinking Water Policy and MUN water quality objectives where applicable.

RESPONSE: See response to City of Sacramento Comment No. 10.

City of Sacramento Comment No. 19 (Declaration that there is “Extensive Monitoring”): The statement on page 27, “The summary demonstrates that there is extensive monitoring of the Colusa Basin Drain, Sutter Bypass and downstream main stem Sacramento River to the Delta for a wide variety of water quality constituents which are used to evaluate the protection of all the applicable beneficial uses in these water bodies.”, is not supported by the data and should be revised or clarified.

RESPONSE: Staff considers the statement justified based on information evaluated.

City of Sacramento Comment No. 20 (Focus Monitoring Program Evaluation): We request that the Board staff focus the monitoring program evaluation for this POTW proposed Basin Plan Amendment on the sites located in the vicinity of the discharge of Colusa Basin Drain and Sutter Bypass/Sacramento Slough, re-evaluate the monitoring data available at those sites, consider the purposes and tenure of those monitoring programs to identify data gaps and determine the necessity of any additional monitoring for this MUN de-designation, and consider how to address data gaps for the monitoring required to support the *Sources of Drinking Water Policy* exception.

RESPONSE: Water from the twelve water bodies proposed for MUN de-designation flow into either the Sutter Bypass or the Colusa Basin Drain. Exception 2b of the *Sources of Drinking Water Policy* only requires that the discharge of the de-designated systems be monitored, best represented in this case by integrated water quality downstream in the Colusa Basin Drain and Sutter Bypass. The discharge from the two collection systems into the Sacramento River has been and will continue to be monitored under several programs.

City of Sacramento Comment No. 21 (Clarification of Drinking Water Technical Information): The term “standard treatment” is utilized in the Executive Summary and Section 1.1.3; however this term is not utilized in the drinking water industry, does not have any definition, and should not be utilized in this document.

RESPONSE: Staff report updated with “conventional treatment” in place of “standard treatment” Staff appreciates the clarification of the Drinking Water Technical Information.

CALIFORNIA URBAN WATER AGENCIES COMMENTS

Comments were received from Ms. Cindy Paulson, Ph.D., Executive Director, California Urban Water Agencies, on 20 February 2015.

California Urban Water Agencies Comment No. 1: Existing water quality conditions should be evaluated before a Basin Plan Amendment is adopted. The Central Valley Water Board staff

compiled extensive information on existing monitoring programs to justify their recommendation that additional monitoring is not needed to comply with Exception 2b of the Sources of Drinking Water Policy. However, there was not an adequate evaluation of the data collected by these monitoring programs to (1) determine if the Colusa Basin Drain and Sutter Bypass currently meet the MUN water quality objectives prior to discharge to the Sacramento River, (2) determine if the Sacramento River, immediately downstream of the discharges, meets the MUN water quality objectives, and (3) determine if the existing monitoring programs provide sufficient data to determine compliance with water quality objectives.

RESPONSE: As stated above, Board staff have documented that there will continue to be sufficient monitoring information collected under existing monitoring efforts to comply with *Sources of Drinking Water Policy* Exception 2b. Furthermore, monitoring data compiled and evaluated by the Board to date indicates that the de-designation of the MUN beneficial use in the twelve water bodies will have little to no impact on water quality in the downstream water bodies, including the Colusa Basin Drain, Sutter Bypass, and Sacramento River. This data includes data collected during an 18-month water quality monitoring study (Central Valley Water Board, 2014a) conducted from April 2012 to September 2013 to assess water quality conditions upstream, in, and downstream of the twelve water bodies proposed for MUN de-designation and data collected as part of a one-day synoptic evaluation conducted in the Sutter Bypass, Colusa Basin Drain, and the Sacramento River in June 2014 (Central Valley Water Board, 2014b).

Key findings show that most primary and secondary MCLs were below the evaluation criteria, elevated constituent levels were generally part of the background conditions, and elevated wastewater effluent concentrations dissipated before or right after the first downstream site. Full data water quality reports are available on the project website. Water quality data in the Sacramento River Basin dating back over forty years were also reviewed by staff and indicate that total levels of aluminum, iron, and manganese measured in the two studies correlate to historic background concentrations.

Flows from the twelve water bodies discharge into either the Sutter Bypass or the Colusa Basin Drain. The Sutter Bypass and the Colusa Basin Drain are not designated as supporting the MUN beneficial use and are not required to meet the MUN water quality objectives prior to discharge to the Sacramento River. Staff review of the existing monitoring programs determined that sufficient data was collected and will be collected in the Sutter Bypass and the Colusa Basin Drain to ensure compliance with all relevant water quality objectives as required by *Sources of Drinking Water Policy* Exception 2b.

California Urban Water Agencies Comment No. 2: The Basin Plan Amendment should require periodic review of the data. The Draft Basin Plan Amendment does not require a periodic assessment of whether water quality objectives are being met in the future at the mouth of the Colusa Basin Drain, the mouth of Sutter Bypass, and in the Sacramento River immediately downstream of these two discharges. The Basin Plan Amendment should require periodic review of the data to determine if water quality objectives are being met and to determine if the monitoring programs continue to be adequate to conduct this evaluation.

Furthermore, CUWA is also concerned about the inability to quickly correct a problem if the monitoring shows that a discharge to a MUN designated water body is not meeting the MUN water quality objectives. The Central Valley Water Board staff explained at the 26 September 2014 meeting that the only course of action is to develop a total maximum daily load (TMDL). The process of listing a water body, developing a TMDL, and implementing the TMDL takes many years and water quality objectives are not met during those years.

RESPONSE: As stated above, the Board is under existing obligations to periodically evaluate readily available data both internally and from other agencies for regular assessments of ambient surface water quality conditions and program effectiveness, and this includes the Board's obligation to periodically update the California Integrated Report.

Furthermore, the development of a TMDL is not the only course of action that can be taken by the Central Valley Water Board to correct a persistent water quality problem. In fact, a TMDL may not be the preferred regulatory approach when existing water quality programs, such as the ILRP and the NPDES Permitting Program, can readily respond and rectify a discovered impairment. The Board can also exercise its enforcement authority to require the development and submittal of technical reports and the development and execution of remedial action plans to resolve issues quickly, obviating the need to develop a TMDL.

Board staff also reiterate the fact that the monitoring conducted in the receiving waters is just one of many water quality metrics that can be used to identify problems – the water quality monitoring performed by both the NPDES-regulated entities and the grower coalitions may provide an even better tool to identify and rectify downstream impairments caused by those types of regulated entities.

California Urban Water Agencies Comment No. 3: There are a number of problems with relying on existing monitoring programs, which may not provide adequate data. Potential problems with existing data include:

- Existing monitoring is done voluntarily by many agencies (e.g. the MWQI Program, funded by the State Water Project Contractors Authority) and could be discontinued at any time. It appears that the MWQI station on the Colusa Basin Drain is the one that would be used to determine if the discharge from the Colusa Basin Drain is meeting MUN water quality objectives. It is inappropriate to shift the responsibility for determining if water quality objectives are being met from the municipal and agricultural dischargers to the downstream water agencies.
- Existing monitoring is done for other purposes and may not include all of the constituents required to determine compliance with the MUN water quality objectives. As stated previously, there has not been an adequate evaluation of the existing data.
- The Staff Report states that many programs such as MWQI produce Annual Reports, implying that if there are exceedances of water quality objectives, these reports would point it out. MWQI previously produced reports every two years but that was discontinued in 2009.

RESPONSE: Staff recognizes that the existing monitoring programs may vary in terms of resources and regulatory need and has added language to the Staff Report to make this distinction. However, many of the programs have been ongoing for many years and the proposed Basin Plan Amendment emphasizes the need for better coordination and assessment of the water quality data between agencies. The proposed Basin Plan Amendment does not shift the responsibility for determining if water quality objectives are being met to downstream water agencies. See responses to Issues Nos. 1 and 2 in Section 1 for more clarification.

Staff appreciates the correction to the Staff Report pertaining to the discontinuation of Municipal Water Quality Investigations annual report and has updated the Staff Report accordingly.

California Urban Water Agencies Comment No. 4: Achievement of secondary maximum contaminant levels (MCLs) in source waters should not be undervalued. The Draft Staff Report under-states the importance of secondary MCLs by comparing dissolved metals concentrations to the secondary MCLs, implying that filtration in water treatment plants will remove the particulate forms of the metals. Achieving secondary MCLs in source waters is important for several reasons:

- The compliance point for many water agencies is their raw water source. Water agencies are required to report exceedances of both primary and secondary MCLs to their customers and the Division of Drinking Water. Many customers understandably believe that water is not safe to drink if it is discolored or it smells or tastes bad. The average customer does not distinguish between the exceedance of a secondary MCL and a primary MCL.
- The US Environmental Protection Agency listed manganese on the proposed Drinking Water Contaminant Candidate List (Federal Register, February 4, 2015). The Contaminant Candidate List contains contaminants that are known to occur in public water systems and may require future regulation. This illustrates that manganese could potentially be more than an aesthetic concern.
- While water suppliers are required to treat raw water to meet all drinking water standards, constituents in the raw water can have significant downstream costs and impacts on treatment processes. These costs should not be borne by the downstream water supply agencies; instead discharges should be controlled to prevent them.

RESPONSE: The Staff Report recognizes that the Basin Plans currently require MUN-designated water bodies to achieve both the primary and secondary MCLs. Both total and dissolved concentrations were collected and/or analyzed for certain metals with secondary MCLs. Because there are no MCLs for dissolved fractions of these metals, the secondary MCLs for total concentrations were used as the evaluation criteria for both dissolved and total data. Total concentrations of aluminum, manganese and iron above the MCL correlate to historic concentrations seen throughout the Sacramento River Basin and to levels which water suppliers have been treating to for many years. As detailed in the Section 7, Environmental Review, of the Staff Report, the proposed Basin Plan Amendment does not result in a significant impact to existing water quality downstream of the twelve water bodies or increase the cost of treatment for water supply agencies.

TULARE LAKE BASIN WATER STORAGE DISTRICT AND TULARE LAKE DRAINAGE DISTRICT COMMENTS

Mr. Jacob Westra, Assistant General Manager, Tulare Lake Basin Water Storage District and Mr. Dustin Fuller, Manager, Tulare Lake Drainage District (February 18, 2015)

Tulare Lake Basin Water Storage District and Tulare Lake Drainage District Comment No. 1: We are Stakeholders that participated in the development of subject amendment as well as alternatives for a region-wide MUN beneficial use evaluation process for Ag dominated surface water bodies. As a part of the region-wide evaluation, crucial definitions and a decision tree matrix were developed that should be invaluable in the next phase of the region-wide MUN evaluation process.

We support continuing efforts to develop a Region-wide MUN Basin Plan Amendment for agricultural dominate surface water bodies. We will continue to participate in the Stakeholder process to facilitate the continued planning process.

RESPONSE: Central Valley Water Board staff appreciates Tulare Lake Basin Water Storage District and Tulare Lake Drainage District's support of the proposed Basin Plan and participation in the stakeholder process.

SECTION 3 – COMMENTS PERTAINING TO APPENDIX B, LOWER SACRAMENTO RIVER BASIN WATER QUALITY MONITORING SUMMARY

Corrections pertaining to Appendix B, Lower Sacramento River Basin Water Quality Monitoring Summary were received as part of the written comments from the California Rice Commission and the City of Sacramento.

CALIFORNIA RICE COMMISSION COMMENTS

Comments were received from Ms. Roberta Firoved, Industry Affairs Manager, California Rice Commission.

General Comments on Appendix B: Table B.1-B.9 –

- a. *In reading the monitoring tables in the Staff Report, we notice discrepancies from the results provided in our Annual Monitoring Report (AMR) from 2004 to 2014. Monitoring plan is actually the conditional ILRP. The WDR approved 27 March 2014.*

RESPONSE: Discrepancies in the monitoring tables have been updated to better correlate with provided information from the AMR or WDR. For Tables B1-B9, all monitoring information from the conditional waiver for ILRP has been updated to the new WDR that was approved on March 27, 2014.

Specific Comments on Appendix B: Table B.1-B.9

Table B.1. Summary of Monitoring Programs in the Lower Sacramento River Basin

- b. *Page 59*

Program: ILRP

Agency: California Rice Commission

Monitoring Plan: WDR

Note: it is actually the conditional ILRP. The WDR approved 27 March 2014

Project Term: Ongoing

Data in CEDEN: Yes

The listed constituents include General Water Quality, Organic Carbon, Bacteria/Pathogens, Metals & Trace Elements, Nutrients, Pesticides, and Toxicity. All are correct except Bacteria/Pathogens. The CRC was a collaborator with the University of California, Davis on a CALFED Bay-Delta Program grant, Development and Implementation of Cultural and Water Management Practices in Rice to Protect Downstream Water Quality. The constituents for the grant monitoring included E. coli. Results concluded that no further monitoring was necessary for rice field drainage.

RESPONSE: Upon review of the new WDR, Bacteria/Pathogens were not listed as a constituent for monitoring and were therefore removed from Tables B.1 and B.3 and a note regarding the results was made in the "Monitoring Notes" column of Table B.2.

Table B. 2. Monitoring Sites

- c. *Page 63, Map ID #44, CBD #5, 520XCBDWR: The coordinates we use for CBD5, 520XCBDWR are Latitude 39.1833 N and Longitude -122.0500 W. The CRC has monitored pesticides at this site at least since 1995. Monitoring of rice pesticides at this site actually*

began in the late 1970s. Under the ILRP, the CRC has monitored pesticides since 2004. Nutrients were monitored under the CALFED grant, so the CRC began evaluating those constituents under the ILRP in 2010. The Central Valley Regional Water Board provided an extension to the CRC ILRP for 2013 and 2014. The extension was in place as the Rice WDR was finalized. Our monitoring consisted of Field Parameters and General Physical Parameters during 2013 and 2014.

RESPONSE: Latitude and longitude for the CBD site has been updated to the suggested changes. While reviewing monitoring information in the MRP and the AMRs, staff has found inconsistency in the latitude and longitude reported for this site. Staff suggests that CRC provide the same latitude and longitude in the AMR to eliminate confusion.

- d. *Page 63, Map ID #45, Colusa Basin Drain above KL, 520CBDKL: The coordinates we use for CBD5, 520XCBWDR are Latitude 39.8125 N and Longitude -121.7731 W. The same comments apply to Colusa Basin Drain above KL as CBD #5. We refer to the sites as Colusa Basin Drain #5 (CBD5) and Colusa Basin Drain above Knights Landing (CBD1). Rice Pesticides were monitored at this site several years ago, so we resumed monitoring in 2003.*

RESPONSE: Staff would like to note that the coordinates provided in above was an update to the Colusa Basin Drain above KL and not CBD #5. The same comments apply to Colusa Basin Drain above KL as CBD #5. Staff suggests that CRC provide the same latitude and longitude in the AMR to eliminate confusion. The site name of CBD #5 has been updated to Colusa Basin Drain #5 in the monitoring tables.

- e. *Page 64, Map ID #46, Sacramento Slough near Karnak Bridge, SSB: We changed our monitoring from the gauging station to the adjacent bridge due to safety concerns from the erosion of the bank from flooding. The information we have includes the Station (Site) Code of 530XSSLNK, Latitude 38.7850 N and -121.7731 W. Rice pesticides were monitored at this site several years ago, so we resumed monitoring in 2003. All the monitoring information is the same as CBD5 and CBD1.*

RESPONSE: The site code, latitude, and longitude have been updated to the suggested changes in the monitoring tables.

Table B.3. General Water Quality & Bacteria/Pathogens

- f. *Page 74, CBD #5, Colusa Basin Drain above KL, Sacramento Slough near Karnak Bridge: General Water Quality & Bacteria/Pathogen concludes M¹ for which there is no legend. The constituents of EC, DO, pH, Temp, and Turbidity are constituents we monitored. We monitored TDS, but not TSS, which we will include with the Rice WDR starting in 2015. We also did not monitor E. coli and Total fecal coliforms in the ILRP, nor are we required under the Rice WDR. As mentioned previously in this document, monitoring for E. coli was under the CALFED Grant, and the results did not justify additional evaluation for rice field discharges.*

RESPONSE: The superscript of 1 was defined as “Monthly from April to August” at the end of Table B.9. General Water Quality frequency has been updated to O^{AMC} (Other-Assessment, Modified Assessment, and Core monitoring). Due to the complicated nature of ILRP monitoring frequencies, staff has decided to assign either A (assessment), M (modified assessment), and/or C (core) as the frequency and note that specific frequency details can be found in the WDR. The legend at the end of Table B.9 has been updated to provide clarification for monitoring frequencies. As mentioned in earlier responses, Bacteria/Pathogens have been removed from Table B.3 and a note regarding the results was made in the “Monitoring Notes” column of Table B.2. TSS monitoring was kept in the

table since the CRC comment applied to the conditional waiver for ILRP. Monitoring of TSS is listed in the new WDR that was approved on March 27, 2014.

Table B.5b. Metals & Trace Elements Part II

- g. *Page 93, CBD #5, Colusa Basin Drain above KL, Sacramento Slough near Karnak Bridge: Minerals & Trace Elements concluded M² for which there is no legend. We monitored both dissolved and total copper consistently over the years. Please let us know if the reporting of total copper is necessary.*

RESPONSE: The superscript of 2 was defined as “Monthly from April to May” at the end of Table B.9. Metals & Trace Elements Part II frequency has been updated to O^A (Other-Assessment monitoring). The same monitoring frequency responses apply to Metals & Trace Elements Part II as do for General Water Quality. Since the new WDR does not list copper, copper has been removed from the monitoring tables. The proposed Basin Plan Amendment does not recommend any additional monitoring and as such, the necessity of reporting total copper in the future is an issue that would be more appropriately addressed through ILRP.

Table B. 8. Nutrients & Organic Carbon

- h. *Page 111, CBD #5, Colusa Basin Drain above KL, Sacramento Slough near Karnak Bridge: Nutrients & Organic Carbon concludes M³ for which there is no legend. We monitored Ammonia as N, Nitrate as N, Nitrite as N and Total Organic Carbon (TOC), with the conclusion as M¹.*

RESPONSE: The superscript of 3 was defined as “Monthly from July to August” at the end of Table B. 9 and superscript of 1 is defined in the General Water Quality & Bacteria/Pathogens response. Nutrients & Organic Carbon frequency has been updated to O^{AM} (Other-Assessment and Modified Assessment monitoring). The same monitoring frequency responses apply to Nutrients & Organic Carbon as do for General Water Quality and Metals & Trace Elements Part II.

Table B.9. Pesticides & Toxicity

- i. *Page 116 and 117, CBD #5, Colusa Basin Drain above KL, Sacramento Slough near Karnak Bridge: Pesticides (other) concludes M¹ for which there is no legend. Toxicity concludes M^S for which there is no legend. Correct, we have monitoring Hyalella Azteca and Selenastrum capricornutum. We also monitored Fathead Minnow and Ceriodaphnia dubia.*

RESPONSE: The superscript of 1 is defined in the General Water Quality & Bacteria/Pathogens response. The superscript of S was defined as “Monthly in September” at the end of Table B.9. Pesticides & Toxicity frequency has been updated to O^A (Other-Assessment monitoring). The same monitoring frequency responses apply to Pesticides & Toxicity as do for General Water Quality, Metals & Trace Elements Part II, and Nutrients & Organic Carbon. Since the new WDR lists Fathead Minnow and *Ceriodaphnia dubia*, these have been added to the monitoring table.

CITY OF SACRAMENTO

Comments were received from Ms. Sherill Huun, Supervising Engineer, City of Sacramento, Department of Utilities.

General Comments on Appendix B: Table B1-B9

- a. *There are sites that only include sediment sampling with no water matrix testing, so these would be irrelevant to the evaluation of impacts to the MUN beneficial use in the water. This includes the State Water Resources Control Board Stream Pollution Trends (SPoT) sites, CBD at Knights Landing, Sutter Bypass at RD-1500 Powerplant/Karnak, Sacramento Slough at Karnak, and Clarksburg Marina. We recommend that these sites be removed from the tables.*

RESPONSE: All sites suggested for removal were kept in the monitoring tables. The monitoring summary was used to evaluate the protection of all the applicable beneficial uses in the Sacramento River Basin.

- b. *There are sites located upstream of the de-designated waterbodies, so these would be irrelevant to the evaluation of downstream impacts unless a comparative evaluation is planned. This includes California Rice Commission CBD #5 site and DWR Sacramento River above CBD site.*

RESPONSE: All sites suggested for removal were kept in the monitoring tables. The evaluation of the impacts of to all beneficial uses would ideally include a water quality comparison between upstream and downstream water bodies.

- c. *There are sites which do not represent ambient water quality, so these would be irrelevant to the evaluation of the downstream MUN beneficial use. This includes the CMP North Natomas Development Sump and Sump 111 (which are urban runoff discharge). We request that these sites be removed from the tables.*

RESPONSE: All sites suggested for removal were kept in the monitoring tables. The monitoring summary was used to evaluate the monitoring conducted in this portion of the Sacramento River Basin to protect of all the applicable beneficial uses from all types of possible discharge.

- d. *The drinking water utilities all conduct raw and treated water monitoring in accordance with the specific requirements of Title 22. This monitoring is not reflected in the tables. As part of the Region-Wide Basin Plan Amendment the water utilities can provide more input on the monitoring specifics if desired.*

RESPONSE: The monitoring conducted by the drinking water utilities was not thoroughly accessible at the time of the draft report. Staff appreciates the data that was sent by the drinking water utilities to update this section of the report. The updated monitoring tables include monitoring information conducted by the City of West Sacramento, City of Sacramento, and Freeport Regional Water Authority.

Specific Comments on Appendix B: Table B1-B9

Table B.2. Monitoring Sites

- e. *Page 65, Map ID #13, Sacramento River at Veteran's Bridge and Page 68, Map ID #20, Sacramento River at Freeport Marina: Add "Sacramento Stormwater Quality Partnership" and delete "County of Sacramento DWR" and "City of Sacramento Utility District" to the list of agencies that sponsor the Sacramento Coordinated Monitoring Program (CMP). Current monitoring program is for collection of samples during three wet season storm events and one dry season event.*

RESPONSE: Monitoring agencies and frequency of the Sacramento Coordinated Monitoring Program were updated to the suggested changes. Staff would like to note that Map ID #20 is not a CMP site. Suggested changes were made to the appropriate CMP site: Map ID #11, Freeport upstream of SRWTP.

- f. *Page 66, Map ID #15, Sacramento River Upstream of CSO Discharge Point Nos. 006 and 007, at the Delta King: Correction is needed as follows: Samples taken within the first 4 hours of beginning of storm causing discharge at any of the discharge points Discharge Point Nos. 006 and/or 007 and daily if the discharge event is greater than 24 hours.*

Page 67, Map ID #18, Sacramento River, DS of Discharge Point Nos. 004 and 005, at La Rivage: Correction is needed as follows: Samples taken within the first 4 hours of beginning of storm causing discharge at any of the discharge points Discharge Point Nos. 004 and/or 005 and/or Discharge Point Nos. 002 and/or 003 and daily if the discharge event is greater than 24 hours.

Page 68, Map ID #19, Sacramento River, DS of Discharge Point Nos. 002 and 003, at Wooden Stairs: Correction is needed as follows: Samples taken within the first 4 hours of beginning of storm causing discharge at any of the discharge points Discharge Point Nos. 002 and/or 003 and daily if the discharge event is greater than 24 hours.

RESPONSE: For Map #15, 18, and 19, “any of the discharge points” have been replaced with specific discharge point numbers that corresponds to the numbers stated in the site name. La Rivage and Wooden Stairs’ name has been changed to Westin Boat Dock and Zacharias Park, respectively.

- g. *Page 69, Map ID #21, Sacramento River at Freeport Bridge and Page 72, Map ID #26, Sacramento River at River Mile 43: This is not a City of Sacramento monitoring site and should be deleted.*

RESPONSE: Staff agrees that Map ID#21 and ID#26 are not City of Sacramento monitoring sites. The agency has been corrected to the Sacramento Regional County Sanitation District.

- h. *Page 70, Map ID#12, River Mile 44 downstream of Sacramento Regional Wastewater Treatment Plant: This is not a current monitoring location of the Sacramento River Coordinated Monitoring Program, and we recommend that it be deleted.*

RESPONSE: The monitoring summary included information from 2010 forward to evaluate the type of monitoring that is being conducted in the Sacramento River Basin. A note has been added in the table that monitoring for the River Mile 44 site ended in 2011.

Table B.3. General Water Quality & Bacteria/Pathogens

- i. *Page 75: First monitoring site should be updated to “Sacramento River at Delta King”*

RESPONSE: The order of monitoring sites in the different tables have been reordered for consistently from upstream to downstream.

Table B.4. Metals and Trace Elements Part I

- j. *Page 87 and 88. First site and last sites on page should be show shaded for priority pollutants.*

RESPONSE: Staff has reviewed the NPDES permit for the City of Sacramento Combined Sewer System and confirmed that the testing of priority pollutants was not specified in the permit for all receiving water sites (Sacramento River at Delta King, Miller Park, La Rivage, and Wooden Stairs). Since priority pollutants can consist of constituents that fall under different classifications (e.g., metals, minerals, etc.), staff removed the priority pollutant category and used more accurate categorization.

Table B.8. Nutrients & Organic Carbon

- k. *Page 112, City of Sacramento Combined System, Delta King monitoring site: Ammonia Nitrogen as N is tested but the table shows Ammonia Nitrogen as NH3.*

RESPONSE: Correction of Ammonia Nitrogen as N has been made for the Delta King monitoring site.

Tables B.3-B.9

- l. *Sacramento CMP monitoring includes 4 events per year for Sacramento River at Veterans Bridge and Sacramento River at Freeport Marina. Please see Attachment 2 for list of current monitoring constituents for these monitoring locations. There are several revisions needed to Table B to reflect this information.*

RESPONSE: Staff would like to note that Map ID #20, Sacramento River at Freeport Marina is not a CMP site. Monitoring notes of 4 events per year (Table B.2) were added and constituents (Table B.3-B.9) were updated according to the provided Attachment 2 for the appropriate CMP site: Map ID #11, Freeport upstream of SRWTP and Map ID #13, Sacramento River at Veteran's Bridge.

General Comments on 18-month Sacramento Case Study Water Quality Report- Appendix F: Parameters and Criteria

- m. *The appendix has errors and omissions related to drinking water parameters and criteria. We request that Staff review and consider revisions to address the following: missing other evaluation criteria/guidelines, move of Department of Public Health (DPH) to Division of Drinking Water (DDW), missing MUN related constituents, and incorrect numeric criteria.*

RESPONSE: Appendix F was meant to be used as a reference in comparing Maximum Contaminant Levels, California Toxics Rule, and other evaluation criteria or guidelines when applicable. Appendix F was not meant to be a full listing of every possible MUN evaluation criteria. In an effort to reduce confusion, extraneous evaluation criteria/guidelines have been removed except in cases where the constituent does not have a MCL or CTR criteria. Because of the removal of other evaluation criteria or guidelines, the addition of non-applicable Public Health Goals (PHG), Division of Drinking Water (DDW) Notification Levels, DDW Archived Advisory Levels, and USEPA Health Advisory are not needed.

The following corrections were made:

- California Department of Public Health (DPH) has been corrected to the Division of Drinking Water (DDW).
- CTR values have been corrected for antimony, carbon tetrachloride, and chlorodibromomethane.
- MCL values have been corrected for carbofuran, heptachlor, heptachlor epoxide, and oxamyl.
- Boron's PHG criterion has been corrected to DDW Notification Level to reflect the agency name change.
- Primary MCL was removed for Endosulfan sulfate.
- Fluoride's 2.0 mg/L criterion has been corrected to a Primary MCL.
- Haloacetic acids were added to the list with the Primary MCL of 0.060 mg/L
- Hexavalent chromium has been added to the list with a Primary MCL of 0.010 mg/L.
- Monochlorobenzene was removed from the list because it was a duplication of chlorobenzene.

References

Central Valley Water Board. (2014a). *Evaluation of Water Quality in Agriculturally Dominated Water Bodies in Relation to Municipal and Domestic Supply Beneficial Use (MUN) - Sacramento Valley Archetypes*.

Central Valley Water Board. (2014b). *Technical Memorandum: Synoptic Evaluation of Drinking Water Constituents of Concern in the Sacramento and San Joaquin River Basins: June 2014*.