



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7
100 NORTH CANYONS PARKWAY • LIVERMORE, CA 94551 • PHONE (925) 454-5000 • FAX (925) 454-5727

April 27, 2016

Laurie Taul
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Re: *Comments on Proposed General Waste Discharge Requirements for Confined Animal Facilities Within the San Francisco Bay Region, and associated IS/MND*

Ms. Taul,

Zone 7 Water Agency (Zone 7) has reviewed the above referenced documents in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley. We have a few comments for your consideration:

1. **WDR Scope of Coverage, Item 2 (page 1):** In addition to application to land, the Order should also cover storage and processing (like composting).
2. **WDR Scope of Coverage, Item 5a (page 2):** Some horse boarding facilities do have retention ponds for wash water capture; consider clarifying the example for Tier 1 facilities.
3. **WDR Scope of Coverage, Item 23 (page 5):** The Order should require sampling of any existing monitoring wells in addition to existing groundwater wells.
4. **WDR Required Reports and Notices, Item 3a (page 21):** "Minimal" may be overly vague, and/or it should state who determines if the number of animals is "minimal".
5. **WDR Required Reports and Notices, Item 3c (page 21):** As written, this statement can be mis-read. Consider "Animals are rarely confined and/or fed in areas devoid of vegetation..."
6. **WDR Attachment A MRP, Item b (page 8):** The Nitrate benchmark is more appropriate at "10 mg/l as N" rather than 45.0 mg/l.
7. **WDR Attachment A MRP (page 9):** While the annual report template was not provided for review, following are suggestions for content of these reports:

- a. Maximum animal population by type for reporting period.
 - b. Site and operation changes since last reporting period.
 - c. Site map similar to that in RMP or WMP with any changes highlighted.
 - d. Facility inspection checklist.
 - e. Identification of potential water quality problem areas and planned repairs, and planned repair schedule.
8. **Well Monitoring:** The MND and the WDR appear to be somewhat out of step on the issue of groundwater monitoring. The Proposed Mitigated Negative Declaration states that "monitoring of surface water and groundwater to demonstrate compliance is required" (IX: Hydrology and Water Quality, Item f), but the Tentative General WDR Order (R2-2016-00XX) states that "Tier 1 facilities are not required to conduct groundwater monitoring (see Item 18) and for Tier 2 CAFs only "requires sampling of existing groundwater wells at any CAF facility that utilizes a waste pond to store and manage operational waste" (see Item 23). Further, the groundwater monitoring requirements are unclear for Tier 3 CAFs or for Tier 2 CAFS when no wells exist at the site.

We appreciate the opportunity to comment on this project.

If you have any general questions on this letter, please feel free to contact me at (925) 454-5005 or via email at erank@zone7water.com . Further, questions related to Zone 7's groundwater management plan may be directed to Matt Katen, 925-454-5071, or mkaten@zone7water.com.

Sincerely,



Elke Rank

cc: Carol Mahoney, Matt Katen, file