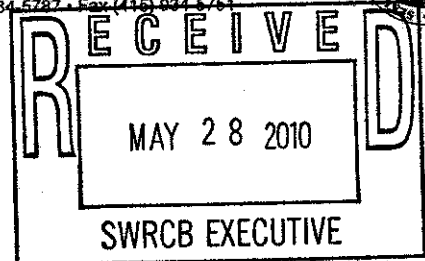


## SAN FRANCISCO PUBLIC UTILITIES COMMISSION

OFFICE OF THE ASSISTANT GENERAL MANAGER - WATER ENTERPRISE  
1155 Market Street, 11th Floor, San Francisco, CA 94103 • Tel. (415) 934-5787 • Fax (415) 934-5764



Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

RE: Comment letter on the SWRCB 303 [d] list

Thank you for the opportunity to comment on the draft State of California CWA Section 303 [d] list of impaired water bodies.

The San Francisco Public Utilities Commission [SFPUC] manages drinking water reservoirs and their associated watersheds in the Bay Area and the Hetch Hetchy Reservoir in Yosemite National Park. By sustainably managing the natural resources entrusted to our organization, the SFPUC provides a reliable source of high quality drinking water to 2.5 million Bay Area residents. Our comments pertain to the 303 [d] listing of both Hetch Hetchy and Calaveras Reservoirs and Lake Merced.

### Hetch Hetchy Reservoir

We are concerned that Hetch Hetchy Reservoir and Calaveras Reservoir in the East Bay were both listed for mercury based on elevated concentrations in fish tissue. We were first made aware of this situation upon review of the Surface Water Ambient Monitoring Program results early last year [SWAMP 2009].

In response, the SFPUC conducted additional fish tissue analyses during the summer of 2009 in Hetch Hetchy Reservoir. The study confirmed elevated mercury in both Brown and Rainbow Trout tissue with the concentration of mercury increasing as the size of fish increased. While mercury in trout tissue is elevated compared to consumption guidelines prepared by the Office of Environmental Health Hazard Assessment [OEHHHA] drinking water in the reservoir is well below the standard established by the California Department of Public Health.

The SFPUC has had initial conversations with the Yosemite National Park Service [NPS] and the Office of Environmental Health Hazard Assessment [OEHHHA] to outline a regional study to evaluate the potential source of mercury to the watershed and to alert the public to the potential health risks of consuming trout from Hetch Hetchy Reservoir. The source of mercury to the reservoir is unknown at this time but it may include atmospheric deposition and/or local geology.

### Calaveras Reservoir

Calaveras Reservoir is listed for mercury due to elevated concentrations in Largemouth Bass tissue as originally reported in the SWAMP surveys. Similarly to Hetch Hetchy Reservoir the source of mercury to Calaveras Reservoir is unknown but may include geologic sources or atmospheric deposition. Currently Public Health risk associated with the consumption of Largemouth Bass from this reservoir is negligible given the access restrictions imposed by the SFPUC. Fishing is explicitly not allowed at Calaveras Reservoir. A Bay Area regional atmospheric mercury monitoring program supported by local water utilities and other agencies with listed water bodies would provide critical information to help prepare future management strategies.

We are also concerned that a Total Maximum Daily Load [TMDL] is scheduled to be completed for Calaveras Reservoir in 2012 which appears infeasible given the very limited information available on sources of mercury to this reservoir. Perhaps this is a typographic error as other reservoirs listed for mercury with unknown sources in the Bay Area show a TMDL completion date of 2021.

GAVIN NEWSOM  
MAYOR

ANN MOLLER CAEN  
PRESIDENT

F.X. CROWLEY  
VICE PRESIDENT

FRANCESCA VIETOR  
COMMISSIONER

JULIET ELLIS  
COMMISSIONER

ANSON B. MORAN  
COMMISSIONER

ED HARRINGTON  
GENERAL MANAGER

### Lake Merced

Lake Merced in San Francisco is listed for low dissolved oxygen and pH. A Lake Merced water quality data report was completed recently summarizing monitoring data from 1997-2008. It revealed that dissolved oxygen measured at the surface down to 5 feet depth exceeded 5 mg/L during every survey [Kennedy Jenks 2010]. Low DO was only measured at the sediment water interface during summer months when the lake exhibits stratification. Summer stratification is a common phenomenon in natural lakes and ponds and in no way indicates that this water body fails to support aquatic habitat beneficial uses. The water quality summary also revealed that pH was between 6.5 and 9.0 over the 11 year monitoring period. Lake Merced should be removed from the list for these reasons.

Please contact Tim Ramirez of my staff if you have any concerns or questions on this comment letter.

Sincerely,



Steven R. Ritchie  
Assistant General Manager  
Water Enterprise

Cc Xavier Fernandez SFB RWQCB  
Tim Ramirez SFPUC NRD

### References

- 
- Kennedy/Jenks Consultants 2010. Lake Merced Water Quality Data Organization, Review and Analysis. January 25, 2010.
  - SWAMP, 2009. Contaminants in Fish from California Lakes and Reservoirs: Technical Report on Year One of a Two-Year Screening Survey. A Report of the Surface Water Ambient Monitoring Program [SWAMP]. Sacramento, California.