

Update to the Basin Plan's Freshwater Bacteria Objectives for the Coachella Valley Storm Water Channel, Response to Comments on the Tentative Resolution, Proposed Basin Plan Language, and Draft Staff Report, Comment Due Date: May 15, 2010

Responses to comments were made at the May 20, 2010 Board Meeting in La Quinta, California.

1. Riverside County Flood Control and Water Conservation District
2. Coachella Valley Water District (CVWD)

No.	Author	Date	Comment	Response
1.1	Riverside County Flood Control District	8/7/2008	The permittees support the use of E. coli as the appropriate pathogen indicator, however, the USEPA guidance notes that E. coli water quality standards apply to dry weather, steady-state conditions only. Narrative criteria should be applied during non-steady state conditions.	Page 3-1 of the Region 7 Basin Plan states: "Controllable water quality factors shall conform to the water quality objectives contained herein. When other factors result in the degradation of water quality beyond the levels or limits established herein as water quality objectives, the controllable factors shall not cause further degradation of water quality." Therefore, narrative criteria is not necessary.
2.1	Coachella Valley Water District	5/17/2010	CVWD believes it is unwarranted to mandate the most stringent bacteria criteria to protect swimmers in the CVSC. CVWD recommends that the 30-day geometric mean E. coli objective for the CVSC be established at 235 MPN/100ml.	Region 7 has an agreement with USEPA that if the Basin Plan is brought into alignment with the CVSC pathogen TMDL, then the TMDL can proceed. At present, the bacteria objectives for the TMDL are in conflict with the Basin Plan bacteria objectives. And since the numerical limits for the TMDL are set at 126 MPN/ml, the Basin Plan must also be set at 126 MPN/100ml. Therefore, the numerical limits for the geometric mean will not be changed.
2.2	Coachella Valley Water District	5/17/2010	CVWD recommends that the single sample maximum E. coli objective for the CVSC be established at 576 MPN/100ml.	See response comments in section 2.1 regarding changing numerical bacteria limits.
2.3	Coachella Valley Water District	5/17/2008	The correct length of the CVSC is 24.5 miles, not 17 miles.	While the amendment will only apply to a 17-mile reach of the CVSC, the total length of the CVSC is in fact 24.5 miles. The staff report has been edited to reflect this change.