

**04/08/15 BD MEETING – ITEM 13  
CHANGE SHEET #1 (CIRCULATED 4/4/15)**

Necessary changes may be made to the Comment Summary and Responses to the proposed Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) List) portion of the 2012 California Integrated Report, circulated on March 23, 2015. The revisions shown in ~~bold~~ ~~strikeout~~ and underline reflect text removed and added to the Comment Summary and Responses to the proposed Clean Water Act Section 303(d) List portion of the 2012 California Integrated Report with Change Sheet #1.

On page 10 of the Comment Summary and Responses to the proposed Clean Water Act Section 303(d) List portion of the 2012 California Integrated Report, change Response to Comment 1.0 as follows:

In addition to recognizing U.S. EPA's recommendation that segments be placed in Category 4c when the cause is solely due to pollution, and given the uncertainties associated with determining appropriate flow criteria to be used as a threshold for determining impairment, the State Water Board does not believe that placing segments in Category 4c of the Integrated Report ~~results~~ is warranted.

On page 32-33 of the Comment Summary and Responses to the proposed Clean Water Act 303(d) List portion of the 2012 California Integrated Report, change Response to Comment 3.5 as follows:

The commenter points out that the many board actions currently underway do not address other or all impaired ~~waterways~~ waterbodies where readily available data exists indicating impairment due to flow. ~~State Water Board staff has determined that the readily available data submitted is not sufficient to indicate impairment solely due to flow. The one action to fit all impairments does not work well in situations that are as complicated and site specific as those related to non-pollutant water quality impairments caused by flow. While the commenter believes that these efforts cannot replace water quality related flow listings, these are important steps that can be taken in the near term and do not rely on categorizing a waterbody as flow-impaired. Consequently, if it is the State Water Board's desire to include non-pollutant related flow impairments under Category 4c of the California Integrated Report, a consistent and transparent methodology must be put into place. Moving forward with categorization of flow impairment based data and information that is not defensible would defeat the purpose of any efforts to achieve the commenter's desired potential results. Any staff recommendation to categorize the beneficial uses of a waterbody as impaired due solely to anthropogenic changes in flow may be difficult to support on a technical basis if performed without a standardized and documented methodology. Further, the effort required of Regional Water Board staff to conduct initial assessments and make recommendations on a case-by-case basis, and the subsequent effort required of State Water Board staff to understand the Regional Water Board staff assessments and recommendations will likely require staff resources far in excess of those currently available. For the above reasons relating to transparency of process, adequacy of technical analysis, and prudent use of resources, any steps that can be taken to address flow through other programs and authorities should be, and are being taken now, and the issue of flow impairment should be addressed carefully through development of an assessment method before assessments are performed on a case-by-case basis.~~