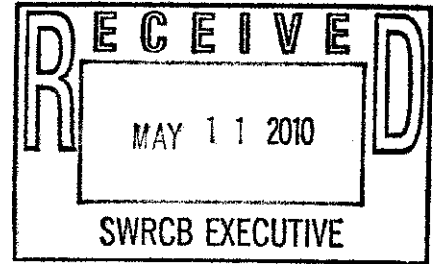




Environmental Utilities
Wastewater Division
2005 Hilltop Circle
Roseville, California 95747

6/15 Board Meeting
2010 Integrated Report 303(d)
Deadline: 5/28/10 by 12 noon

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



May 4, 2010

RE: Comment Letter – 2010 Integrated Report / Section 303(d) List.

Dear Ms. Townsend:

The City of Roseville (City) has reviewed the State Water Boards draft *2010 Integrated Report (Clean Water Act Section 303(d) List / 305(b) Report)*, which includes recommended changes to the 2006 Clean Water Act Section 303(d) list of impaired water bodies. The 2010 Integrated Report was made available for public review through public notice provided on April 19, 2010. Comments on the 2010 Integrated Report are due to the State Water Board by 12:00 noon on May 28, 2010.

The City has taken an active role in the Section 303(d) listing process by both providing analytical data and detailed review comments to the Central Valley Regional Water Quality Control Board over the course of this most recent listing process. The City intends to remain an active stakeholder in this process and seeks to correct several editorial issues that remain within the proposed 303(d) listings on Pleasant Grove Creek. It is the desire of the City to have all elements of the 2010 Integrated Report and mapping tool, as they relate to Pleasant Grove Creek, in agreement with each other, where at present the Fact Sheets, Section 303(d) list, and web-based mapping tool are not. Therefore, the City requests that the State Water Board address the following issues prior to finalizing the 2010 Integrated Report.

- In the Fact Sheet for the proposed dissolved oxygen listing of Pleasant Grove Creek, the creek, and the City's wastewater treatment plant are named Pacific Grove. The City requests that all uses of "Pacific" be replaced with "Pleasant". The correct terminology is therefore: Pleasant Grove Wastewater Treatment Plant and Pleasant Grove Creek.
- Although the Fact Sheet for the proposed dissolved oxygen listing on Pleasant Grove Creek accurately states that the proposed listing is for the reach of Pleasant Grove Creek upstream of the City's Pleasant Grove Wastewater Treatment Plant, the actual Section 303(d) list does not. The City requests that the list be footnoted to reflect what is stated in the Fact Sheet, such as "This listing is for Pleasant Grove Creek upstream of the Pleasant Grove Wastewater Treatment Plant effluent outfall".

- Similar to the issue of the dissolved oxygen listing on Pleasant Grove Creek, for sediment toxicity the Section 303(d) list does not footnote the appropriate reach of Pleasant Grove Creek, while the Fact Sheet does. This proposed listing is based on the same data as that used for the pyrethroids listing, and should be identically footnoted – “This listing is for Pleasant Grove Creek upstream of Fiddymment Road”.
- The mapping tool located on the State Water Boards 2010 Integrated Report webpage inaccurately depicts the reaches of Pleasant Grove Creek proposed for listing. When queried, the map shows the full length of Pleasant Grove Creek as being listed for dissolved oxygen, pyrethroids, and sediment toxicity, where in fact only those reaches above the Pleasant Grove Wastewater Treatment Plant (dissolved oxygen) or Fiddymment Road (pyrethroids and sediment toxicity) are being proposed for listing. The City requests that this map be revised to accurately reflect the reaches being proposed for listing so as to avoid any confusion.
- It appears the State Water Board has included an additional listing on Pleasant Grove Creek, South Branch Pleasant Grove Creek, and Kaseberg Creek for sediment toxicity. Although the City does not dispute this sediment toxicity listing, the City does question the source identification as “unknown”. The data used for the listing is the same data used for the pyrethroid insecticides, and the Fact Sheet covering the sediment toxicity listings name pyrethroid insecticides as the pollutant causing the observed toxicity. Therefore, without reason stated in the Fact Sheet, the source of sediment toxicity should somehow be linked to that of the pyrethroid listing (i.e., urban runoff/storm sewers). Alternatively, if the source of sediment toxicity can’t be identified, the source in support of the pyrethroid listing should be changed to “unknown” and the Fact Sheets appropriately amended. Therefore, the City seeks clarification on this “source unknown” determination, and requests that the statement of source in the Section 303(d) list accurately reflect the information provided in the supporting information Fact Sheets.

Thank you for the opportunity to comment and we look forward to your response.

Sincerely,



Art O'Brien
Wastewater Utility Manager