



www.americanwhitewater.org

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August 27, 2012

Stacy Gotham
Central Valley Water Board
Redding Branch Office
364 Knollcrest Drive, Suite 205
Redding, CA 96002

Sent via e-mail to: stacy.gotham@waterboards.ca.gov

Dear Ms. Gotham,

American Whitewater appreciates having the opportunity to comment on the tentative NPDES Permit for the City of Mt. Shasta Wastewater Treatment Plant (NPDES # CA0078051). The Sacramento River below Box Canyon Dam is a popular whitewater boating run, and many of our members travel for hours from around the region to run this reach of the river. The Shasta Wastewater Treatment Plant discharges to the river between September 15th and June 14th each year immediately above a technically challenging rapid known as “Brown Trout” Rapid. Because of the technical nature of the rapid, whitewater paddlers come into direct contact with the water through this section. American Whitewater is supportive of efforts to protect the health and safety of the public as they recreate on the river.

American Whitewater is a national 501(c)(3) non-profit organization that works to conserve and restore our nation’s whitewater resources and enhance opportunities to enjoy them safely. With over 5,500 members and 100 affiliate clubs, we represent the conservation interests of tens of thousands of whitewater enthusiasts nationwide, and have a strong membership base in Northern California and Southern Oregon. As avid whitewater recreationists we value our nation’s river systems and associated riparian zones, and we have a direct interest in seeing this country’s rivers healthy, strong and clean for everyone to enjoy.

The tentative permit strives to be protective of the health and safety of whitewater enthusiasts – from including whitewater recreation as a beneficial use, to using flow-based standards. Flows in the river are directly tied to the operation of the Box Canyon Dam, and boaters make the run whenever flows allow for the opportunity. While the permit defines the “recreation season” as June 15 to September 14, and states that whitewater boaters use the river between early March and the summer (p. F-18), our members use the river whenever flows are high enough to allow it. This happens throughout the year – our members boat on the river in November as the reservoir is drawn-down, and also report running the river in December and January. Some members report making the run at least 40-50 times a year. For this reason, we are supportive of the permit provisions that require flow-based total coliform standards during the winter period between November 15 and April 14.



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It is important to ensure that as the public boats through the mixing zone and area immediately below the outfall they will be fully protected. American Whitewater requests that full consideration be given to the fact that the outfall discharges into an area of slack water just above the Brown Trout Rapid, where boaters often pause to scout. They also come into direct contact with the water immediately downstream as they go through the rapid.

The tentative permit is protective of contact recreation when flows are above 200 cfs. We are aware that this number may change based on guidebooks and the flow levels when the dam spills. Given the importance of this number, American Whitewater requests additional clarification in the permit about where the flow rates were measured from to develop the standard. It is important to ensure that the flow rates used to set the standards are in line with the station that will be used to establish the daily flow rate for the facility, which will be taken immediately upstream from the outfall.

Currently, the tentative permit requires the permittee to monitor the flow of the Sacramento River once a day (Table E-7a, page E-13). This is an inadequate amount of monitoring to be able to know whether the facility requires DPH standards or not. River flows can change throughout the day, and as such, we suggest that river flow be monitored hourly – at a minimum – to determine whether or not the permittee is required to implement more stringent disinfection standards outlined in the permit. There currently is a gauge at Box Canyon Dam run by the County that can be used, and we request that the permittee work with the County to also make this flow information available to the public in real-time via the internet.

Thank you again for the opportunity to comment on the Mt. Shasta Wastewater Treatment Plant permit, and for your efforts to ensure public safety.

Sincerely,

A handwritten signature in black ink that reads "Dave Steindorf".

Dave Steindorf
California Stewardship Director

A handwritten signature in black ink that reads "Megan Hooker".

Megan Hooker
Associate Stewardship Director