

**Colorado River Basin Regional Water Quality Control Board**

**Response to comments on the 2017 Triennial Review of the  
Water Quality Control Plan for the Colorado River Basin Region**

This document presents comments and/or summaries of comments received during the public comment period for the Triennial Review of the Water Quality Control Plan for the Colorado River Basin Region. The formal public comment period began upon public release of the staff report on September 15, 2017, with comments due by close of business on October 30, 2017.

Commenter	Organization	Date	Attachments
Mathew Mitchell	United States Environmental Protection Agency (USEPA)	October 30, 2017	Letter from USEPA to the California Regional Water Quality Control Board, Colorado River Basin Region (Colorado River Water Board), October 30, 2017 with attachments.

USEPA Comment 1

We agree that the projects summarized in the Final Draft 2017 Triennial Review are priority issues.

Comment 1 Response

USEPA's support regarding priority issues is appreciated.

USEPA Comment 2

We continue to support as a high priority, identification of fresh waters that support early life stages of salmonids, and revision of pentachlorophenol (PCP) water quality objectives, where appropriate, as part of this Triennial Review Process.

Comment 2 Response

The Colorado River Basin Water Board acknowledges and agrees with the importance of protecting sensitive aquatic species, such as salmonids, through the implementation of protective water quality objectives. The Colorado River Board has considered USEPA's November 14, 2007 letter to the state and regional water boards recommending that the water boards, on a site-specific basis, adopt revised aquatic life criteria for PCPs under conditions of low dissolved oxygen and high temperatures. While the Colorado River Basin is located in a desert region where temperatures regularly exceed 110 degrees Fahrenheit during the summer months, the Colorado River Basin Water Board has determined that site-specific objectives for PCPs are not needed at this time. The desert climate is largely unsuitable for cold water fish species, including salmonids. With the exception of Snow Creek, the region has no known waterbodies where perennial populations of salmonids occur, and it is the opinion of the Colorado River Basin Water Board that the region's waters (with the exception of Snow Creek) are incapable of supporting perennial fish populations of the family Salmonidae.

Further, Snow Creek is located roughly northwest of Palm Springs on the western edge of the Santa Rosa and San Jacinto Mountains National Monument. The land is managed by the National Forest Service, with an easement granted to the Coachella Valley Water District, who strictly controls access to the creek. This pristine creek supports a non-indigenous population of Rainbow Trout, and given the remote physical location of the creek, combined with the restricted access imposed by CVWD and the absence of urban development in the vicinity, it is extremely unlikely if not impossible for sources of PCP to ever find their way into the creek.

While the region does have a number of smaller, artificial water bodies that temporarily support stocked trout during the cooler parts of the year, these seasonal populations typically do not reproduce as any remaining fish stock die off in the summer months when water temperatures exceed the fish's thermal tolerance.

### USEPA Comment 3

To comply with 40 CFR Section 131.20, the Triennial Review must include an explanation if the State does not adopt new or revised criteria for parameters for which USEPA has published new or updated Clean Water Act (CWA) section 304(a) criteria recommendations.

#### Comment 3 Response

The Colorado River Basin Water Board has reviewed the USEPA 304(a) criteria recommendations for human health and aquatic life. The Colorado River Water Board appreciates the USEPA's ongoing efforts to update its criteria to reflect the most recent science. Except as otherwise described in the Triennial Review Staff report, the Colorado River Basin Water Board is not updating its Basin Plan to reflect updated 304(a) criteria because the State Water Board has taken the lead in adopting statewide WQOs. The Colorado River Basin Water Board continues to take an active supporting role in this process by engaging in discussions and assessments with the State Water Board regarding recommended water quality objectives and by providing data and other relevant information necessary for the state to guide its compliance efforts.

While the Colorado River Basin Water Board understands that some of its existing water objectives may be inconsistent with USEPA's 304(a) criteria

recommendations, the Board has exercised its discretion to focus its limited resources on the highest priority water quality issues for the region at this time. However, the Colorado River Basin Water Board is planning to update its Basin Plan for the following constituents:

**Ammonia:**

The Colorado River Basin Water Board has initiated research into ammonia and its toxic effects, and will consider adopting water quality objectives for ammonia based on the outcome of this research.

**Cadmium:**

State Board is currently planning the adoption of statewide cadmium criteria.

**Pathogens and Pathogen Indicators:**

State Board anticipates adopting bacteria before the end of December 2017. As detailed in item 7 of this Triennial Review, the Colorado River Basin Water Board intends to adopt the State Board's WQOs for bacteria in this Triennial Review cycle.

**Acrolein, carbaryl, copper, diazinon, nonylphenol and tributyltin:**

The Colorado River Basin Water Board is not adopting new water quality objectives for these pollutants at this time, due to a lack of resources. Therefore, it would be prudent for the State Water Board to continue taking the lead in adopting statewide WQOs for these pollutants.

**Mercury:**

State Board adopted statewide mercury objectives on May 2, 2016. USEPA approved these objectives on July 14, 2017. The Staff Report for this Triennial review has been updated to make it explicit that the Colorado River Basin Water Board intends to adopt the criteria in this Triennial Review cycle.

**Selenium:**

The Colorado River Basin Water Board began conducting a comprehensive selenium bioaccumulation assessment in constructed wetlands in June of 2017, and will consider adopting site-specific water quality objectives for selenium in the future.

cc:

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