

DEPARTMENT OF WATER RESOURCES

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March 30, 2017

Mr. Samuel Unger
Executive Officer
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

RE: Comments on the 2016 Los Angeles Region Clean Water Act Section 303(d) List of Impaired Waters

Dear Mr. Unger:

The CA Department of Water Resources (DWR) appreciates the opportunity to comment on the proposed updates to the 303(d) list. The updates to the 303(d) list propose to add the following pollutants to the following State Water Project (SWP) affiliated locations:

- Dieldrin, chlordane, DDT, and polychlorinated biphenyls (PCB) to Pyramid Lake
- PCBs to Castaic Lake and Castaic Lagoon, and
- Dieldrin and PCBs to Elderberry Forebay.

DWR has the following comments:

- 1) The proposed pollutant listings lack a clear rationale that supports the recommended listings. A clear rationale, such as recommended food (i.e. fish) exposure levels (Food and Drug Administration for example), Fish Contaminant Goal (FCG), or Advisory Tissue Levels (ATL) for each pollutant should be provided so a clear comparison can be made. Some of the levels for these contaminants are above the FCG, they have not reached the ATL, and in fact, the report labels these contaminants as very low, as compared to the other higher priority contaminants. Absent such comparison, it is difficult to assess the appropriateness for such listings.
- 2) The PCB data in Table 11 (Summary Report) for Elderberry Forebay does not seem to match that of the proposed listing status. Elderberry Forebay is absent from this Table.
- 3) Insufficient details are provided for dieldrin, chlordane and DDT. A more comprehensive effort that specifically focuses on these contaminants should be conducted before they are proposed for Pyramid Lake additions to the 303(d) list.
- 4) Further analysis, including statistical analysis, should be conducted to support this proposed listing. Given the proposed listing recommendations are based on sample analytical data, a statistical analysis to show that sufficient sample size has been obtained for each lake should be provided. Additional considerations for analysis should also include:

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- Increasing sampling locations. Were the samples obtained truly representative of the entirety of the lakes, especially those that are the subject of this letter?
- Do the composite samples truly represent averages of the fish caught, or are they additive? Can composites identify anomalies? Can a lake-wide composite be skewed, as a result of one very high data point?
- One-time study involving one year seems insufficient. Studies with longer duration are more appropriate to accurately determine the pollutant levels.

If you have any questions, please contact Leah McNearney, Chief, Water Quality Section at (916) 653-5688.

Sincerely,



Anthony Chu, Chief
Environmental Assessment Branch
Division of Operations and Maintenance
California Department of Water Resources

cc:

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