



California Sportfishing Protection Alliance

"An Advocate for Fisheries, Habitat and Water Quality"

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22 October 2006

Mr. Robert Schneider, Chairman
Ms. Pamela Creedon, Executive Officer
Mr. Kenneth Landau, Assistant Executive Officer
Mr. James C. Pedri, Assistant Executive Officer
Ms. Mary L. Randall, Senior WRC Engineer
Mr. Greg Cash, Engr. Geol.
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6144

VIA: Electronic Submission
Hardcopy if Requested

RE: Water Recycling Requirements for Grizzly Creek Golf LLC, Grizzly Creek Golf Course Irrigation, Plumas County

Dear Messrs. Schneider, Landau, Pedri, Cash and Mesdames Creedon, Randall:

The California Sportfishing Protection Alliance and Watershed Enforcers (CSPA) has reviewed the Central Valley Regional Water Quality Control Board's (Regional Board) tentative Water Recycling Requirements (Order or Permit) for Grizzly Creek Golf LLC, Grizzly Creek Golf Course Irrigation, Plumas County (Discharger) and submits the following comments.

Despite the fact that the public comment period closes on 22 October 2006, the proposed Permit is identified on the agenda as an uncontested item. CSPA requests the Permit be removed from the Uncontested Items Calendar and seeks status as a designated party for this proceeding. CSPA is a 501(c)(3) public benefit conservation and research organization established in 1983 for the purpose of conserving, restoring, and enhancing the state's water quality and fishery resources and their aquatic ecosystems and associated riparian habitats. CSPA has actively promoted the protection of water quality and fisheries throughout California before state and federal agencies, the State Legislature and Congress and regularly participates in administrative and judicial proceedings on behalf of its members to protect, enhance, and restore California's degraded surface and ground waters and associated fisheries. CSPA members reside, boat, fish and recreate in and along waterways throughout the Central Valley, including Plumas County.

Our specific comments follow:

1. Incomplete RWD and Cursory Information in the Order Prevents Informed Public Comments

The Order is incomplete and lacks the necessary basic information to enable the public to make comments. What cursory information is contained in the Order is inconsistent with other Reclamation Permits adopted by the Regional Board. For example, the Order does not disclose when or if the Discharger has even completed a RWD. In addition, the Order fails to list Grizzly Ranch Community Services District as a discharger.

California Water Code (CWC) Section 13260 (a) states, in part, “All of the following persons shall file with the appropriate regional board a report of the discharge, containing the information which may be required by the regional board: (1) Any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system.” It is the Discharger’s responsibility to submit a complete RWD. In that the Discharger may contend that their project will be harmed by a delay, they have no one to blame but themselves and have been afforded adequate time (five-years) to develop a complete RWD. A complete RWD must be submitted before staff can draft an Order that complies with the CWC and Basin Plan.

2. Incomplete Groundwater Data

According to Finding No. 31, the Discharger completed CEQA for the project in 2000. The Discharger has had over five years in which to collect groundwater data to complete a technical analysis of groundwater monitoring data to determine final background concentrations. Unfortunately, the Discharger has failed to provide the following information required for a complete RWD:

- All waste constituents to be discharged (see Finding No. 5 and 6);
- The background quality of the uppermost layer of the uppermost aquifer;
- The background quality of other waters that may be affected(discharges to reclamation canals, irrigation channels and surface waters);
- The detailed underlying hydrogeology conditions such as hydraulic conductivity of the soils, capillary rise, groundwater gradient; effects of pumping has groundwater, well map showing locations of all water wells including springs and isolated wetlands within one mile of the WWTP/land application;
- How treatment and control measures are justified as best practicable treatment and control;
- The extent the discharge will impact the quality of each aquifer; and
- The expected obtainable degree of degradation below water quality objectives.

3. Incomplete Description of the Treatment Processes

Finding No. 1 states, “Grizzly Ranch Community Services District (Producer) wastewater treatment plant (Plant) for irrigation of their golf course at the Grizzly Ranch Development. The User proposes to use approximately 29.2 million gallons per year of

disinfected tertiary recycled water for irrigation.” However, this description of the WWTP is too generic in order to allow the public to make meaningful comments.

The Order fails to provide a detailed description of WWTP in either the Order or the attached information sheet. The public cannot reasonably be expected to comment on the recycled water without knowing the basic treatment processes used to produce the recycled water or if the treatment process complies with BPTC. For example, will the WWTP have multiple filter units and if so then what is the maximum hydraulic loading rate per square foot of filter media? This basic wastewater information must be included in the Order for the public to know if the WWTP is actually capable of “tertiary treatment”. The Order is silent on whether redundant systems are employed by the Discharger and the amount of capacity available for long-term storage should the need arise during a treatment system failure.

A detailed description of the treatment processes must be presented and the proposed Order should be recirculated for public review.

4. Order Fails to Describe Potential Impacts to Endangered Species

The Order failed to inform the public regarding the sensitive habitat that surrounds the application area. According to the Discharger’s web page, <http://www.grizzlyranch.com/conservancy.html>, “*Grizzly Ranch occupies more than a thousand pristine acres, bordered by majestic mountains and Big Grizzly Creek.*” The Order is silent on endangered species that may be impacted by the discharge or the amount of degradation that will occur. In addition, the Discharger’s web page indicates that the irrigation system has already been installed. However, the Order fails to discuss the type of irrigation system used by the Discharger, if the Discharger used purple pipe, and if tailwater control structures were installed. It appears that the Discharger has already commenced to operate the system and now seeks Regional Board approval after the fact.

5. Order Fails to Include Site Maps

The Order does not contain the appropriate topographical map of the site location (see attachment A) or a detailed map of the land application area that shows the location of critical features domestic wells, homes, playgrounds, wetlands and surface-water courses. According to the Discharger’s web page, the golf course has a number of lakes and water features; however, the Order fails to discuss whether these water features will receive recycled water. Recycled Water Specifications No. B, 6 states, “Recycled water shall remain within the designated water recycling area, as defined in Finding No. 2, at all times.” This specification is meaningless without a use area map that defines the boundary of the disposal area for the Order. The Discharger has a map of the golf course on its web page. A detailed map of the project area must be included as part of a complete RWD. The proposed Order must be revised to provide the necessary information and maps needed to complete the Order and so that the public is afforded the opportunity to make comments.

6. Order Fails to Include Setbacks for Surface Water

As shown on the Discharger's web page, there are several surface waterways that transverse the recycled water application area. The Order fails to prescribe requirements for setbacks necessary for the protection of the surface waterways and wetlands. The discharge contains chlorine, which is known to be extremely toxic to aquatic life. The discharge potentially contains other toxic waste constituents. Golf courses typically employ an industrial high-pressure sprinkler system for irrigation. It is well known within the industry that high-pressure sprinkler systems generate large extended clouds of mist. During inspections of high-pressure irrigation systems, we have witnessed, on numerous occasions, clouds of mist drifting more than 100 feet offsite. The Order must ensure that the creeks in and around the golf course are posted to protect the public. Additionally, the Order must include a hundred-foot minimum setback requirement to protect surface waters, wetlands and irrigation canal drainages.

Alternately, the setback for surface water may be reduced to 50-feet if tail water barriers are in place to prevent runoff and provided that the Order restricts application times to periods to when the wind velocity is less than 5-miles per hour.

7. Order Fails to Restrict Waste Application to Agronomic rates

The Order does not restrict discharge of wastewater to agronomic rates and therefore, is inconsistent with other Regional Board Orders for recycled water applications.

8. Order Must Require Proper Organic Waste Loading Ratio

The land application areas will be primarily planted with turf grass and shrubs, and trees in the golf course. According to Wastewater Engineering Treatment and Reuse, Metcalf & Eddy, 2003, the optimum bacterial degradation of organic wastes, the ratio of carbon to nitrogen to phosphorus (C:N:P Ratio) should be 20:5:1. The percolation of wastewater containing nitrogen but with disproportionately low concentrations of total organic carbon may retard denitrification and, absent sufficient aeration, may also retard nitrification. In anaerobic soil and groundwater conditions, concentrations of nitrogen in the form of ammonia can leach and discharge to groundwater. The Order fails to require that the Discharger maintain the proper ratio of organic waste need for optimum treatment. The Order does not even require the Discharger to monitor for the carbon and phosphorus; nor did RWD identify the actual concentration of these wastes in the effluent.

9. Order Fails to Demonstrate that Chlorination is BPTC

Finding No. 14 indicates that the Discharger will use chlorination to disinfect the wastewater. Chlorination results in an increase in TDS and chloride concentrations in the effluent. In addition, the chlorination of wastewater is known to create trihalomethanes. Ultraviolet Disinfection (UV) is a proven treatment technology, U.S. EPA Wastewater

Technology Fact Sheet Disinfection, September 1999. UV systems are known to have the following advantages over chemical disinfection:

- UV disinfection is effective at inactivating most viruses, spores, and cysts.
- UV disinfection is a physical process rather than a chemical disinfectant, which eliminates the need to generate, handle, transport, or store toxic/hazardous or corrosive chemicals.
- There is no residual effect that can be harmful to humans or aquatic life.
- UV disinfection is user-friendly for operators.
- UV disinfection has a shorter contact time when compared with other disinfectants (approximately 20 to 30 seconds with low-pressure lamps).
- UV disinfection equipment requires less space than other methods.

Numerous WWTP in the central valley employ UV disinfection, which does not add chloride and thus does not create trihalomethanes. Other disinfection systems are also available that do not use chlorination. Consequently, the Discharger's proposed disinfection system using chlorination does not comply with BPTC.

10. Order fails to demonstrate that a Single Liner is BPTC

The WWTP relies on single liner, or equivalent, to prevent waste discharge from the listed treatment/storage units. However, a single liner is simply antiquated technology with a proven track record of failure. (G. Fred Lee, PhD, PE, DEE, Deficiencies in Subtitle D Landfill Liner Failure and Groundwater Pollution Monitoring).

A single liner with hydraulic connectivity of 1×10^{-6} cms/sec (i.e. one foot per year) will discharge waste to the underlying shallow groundwater the first year of operation. In comparison to a single liner, an SBR package plant (numerous SBR package plant exist in California) with above ground tanks on concrete containment structures will not discharge wastewater to the soil. Additionally, multiple liner systems equipped with leachate collection system or its "engineered equivalent" have been used successfully in the Central Valley for years.

While the Regional Board may not specify the method of treatment required for compliance, the Regional Board is required to ensure that the WWTP complies with BPTC and includes protective limitations and discharge specifications. The Order fails to include Discharge Specifications that limit the amount of leachate to comparable treatment systems, "i.e. engineered equivalent," that meet BPTC. The proposed single liner is not a technology that complies with BPTC.

11. Groundwater Limitation Fails to Comply with State Board Decision

The Order groundwater limitation is inconsistent with Regional Board Orders and allows "most probable number of total coliform organisms to exceed 2.2 MPN per 100 mL over any seven-day period." State Water Board Order No. WQO-2003-0014 upheld the Regional Water Board's interpretation of the Basin Plan with respect to

implementation of the Bacteria objective, stating: “The Basin Plan contains a water quality objective for bacteria that applies to groundwater that states: ‘In groundwaters used for domestic or municipal supply (MUN) the most probable number of coliform organisms over any seven-day period shall be less than 2.2/100 mL.’ Since the groundwater is designated for municipal or domestic supply, a groundwater limitation for coliform of less than 2.2MPN/100 mL is appropriate.” The Order groundwater limitation must be revised to read, “[m]ost probable number of coliform organisms over any seven-day period shall be less than 2.2/100 mL.”

12. Order Fails to Include a BPTC Evaluation

The Order fails to evaluate BPTC for the treatment system necessary to show compliance with Resolution 68-16. The Order is silent on BPTC measures and fails to demonstrate the following:

- a. The degradation is confined within a specified boundary;
- b. The Discharger minimizes the degradation by fully implementing, regularly maintaining, and optimally operating Best Practicable Treatment and Control (BPTC) measures;
- c. The degradation is limited to waste constituents typically encountered in municipal wastewater as specified in the groundwater limitations in this Order; and
- d. The degradation does not result in water quality less than that prescribed in the Basin Plan.

13. Lack of a Legally Defensible Antidegradation Analysis

There is no antidegradation analysis in the proposed Order. Conclusory, unsupported and undocumented statements cannot serve in lieu of a legally required antidegradation analysis. The Order allows the expansion of the wastewater disposal to “*Grizzly Ranch occupies more than a thousand pristine acres, bordered by majestic mountains and Big Grizzly Creek.*”

Resolution 68-16 is applied on a case-by-case, constituent-by-constituent basis in determining whether a certain degree of degradation can be justified. It is incumbent upon the Discharger to provide technical information for the Regional Board to evaluate that fully characterizes:

- a. All waste constituents to be discharged;
- b. The background quality of the uppermost layer of the uppermost aquifer;
- c. The background quality of other waters that may be affected;
- d. The underlying hydrogeologic conditions;
- e. Waste treatment and control measures;
- f. How treatment and control measures are justified as best practicable treatment and control;
- g. The extent the discharge will impact the water quality of each aquifer; and

- h. The expected degree of degradation below water quality objectives.

The Order doesn't identify background water quality, the appropriate effluent limits or whether BPTC is being applied; but is proposing to allow some unknown level of degradation to occur justified by some unknown benefit on the assumption that the Discharger will do in the future what is was legally responsible to do before the permit was issued. This is a blatant violation of the state's antidegradation policy.

California's antidegradation policy is composed of both the federal antidegradation policy and the State Board's Resolution 68-16. (State Water Resources Control Board, Water Quality Order 86-17, p. 20 (1986) ("Order 86-17"); Memorandum from William Attwater, SWRCB to Regional Board Executive Officers, "federal Antidegradation Policy," pp. 2, 18 (Oct. 7, 1987) ("State Antidegradation Guidance").) As part of the state policy for water quality control, the antidegradation policy is binding on all of the Regional Boards. (Water Quality Order 86-17, pp. 17-18.) Implementation of the state's antidegradation policy is guided by the State Antidegradation Guidance, SWRCB Administrative Procedures Update 90-004, 2 July 1990 ("APU 90-004") and USEPA Region IX, "Guidance on Implementing the Antidegradation Provisions of 40 CFR 131.12" (3 June 1987) ("Region IX Guidance"), as well as Water Quality Order 86-17.

The Regional Board must apply the antidegradation policy whenever it takes an action that will lower water quality. (State Antidegradation Guidance, pp. 3, 5, 18, and Region IX Guidance, p. 1.) Application of the policy does not depend on whether the action will actually impair beneficial uses. (State Antidegradation Guidance, p. 6. Actions that trigger use of the antidegradation policy include issuance, re-issuance, and modification of NPDES and Section 404 permits and waste discharge requirements, waiver of waste discharge requirements, issuance of variances, relocation of discharges, issuance of cleanup and abatement orders, increases in discharges due to industrial production and/or municipal growth and/or other sources, exceptions from otherwise applicable water quality objectives, etc. (State Antidegradation Guidance, pp. 7-10, Region IX Guidance, pp. 2-3.) Both the state and federal policies apply to point and nonpoint source pollution. (State Antidegradation Guidance p. 6, Region IX Guidance, p. 4.) The proposed Order allows the expansion of the WWTP by a factor of nine times the current flow and will degrade the underlying groundwater, which is already polluted for a number of waste constituents.

Even a minimal antidegradation analysis would require an examination of: 1) existing applicable water quality standards; 2) ambient conditions in receiving waters compared to standards; 3) incremental changes in constituent loading, both concentration and mass; 4) treatability; 5) best practicable treatment and control (BPTC); 6) comparison of the proposed increased loadings relative to other sources; 7) and assessment of the significance of changes in ambient water quality. A minimal antidegradation analysis must also analyze whether: 1) such degradation is consistent with the maximum benefit to the people of the state; 2) the activity is necessary to accommodate important economic or social development in the area; 3) the highest statutory and regulatory

requirements and best management practices for pollution control are achieved; and 4) resulting water quality is adequate to protect and maintain existing beneficial uses. A BPTC technology analysis must be done on an individual constituent basis; while tertiary treatment may provide BPTC for pathogens, dissolved metals and salts may simply pass through.

Any antidegradation analysis must comport with implementation requirements in State Board Water Quality Order 86-17, State Antidegradation Guidance, APU 90-004 and Region IX Guidance. The conclusory, unsupported, undocumented statements in the Permit are no substitute for a defensible antidegradation analysis.

The antidegradation review process is especially important in the context of waters protected by Tier 2. See EPA, Office of Water Quality Regulations and Standards, Water Quality Standards Handbook, 2nd ed. Chapter 4 (2nd ed. Aug. 1994). Whenever a person proposes an activity that may degrade a water protected by Tier 2, the antidegradation regulation requires a state to: (1) determine whether the degradation is “necessary to accommodate important economic or social development in the area in which the waters are located”; (2) consider less-degrading alternatives; (3) ensure that the best available pollution control measures are used to limit degradation; and (4) guarantee that, if water quality is lowered, existing uses will be fully protected. 40 CFR § 131.12(a)(2); EPA, Office of Water Quality Regulations and Standards, Water Quality Standards Handbook, 2nd ed. 4-1, 4-7 (2nd ed. Aug. 1994). These activity-specific determinations necessarily require that each activity be considered individually.

For example, the APU 90-004 states:

“Factors that should be considered when determining whether the discharge is necessary to accommodate social or economic development and is consistent with maximum public benefit include: a) past, present, and probably beneficial uses of the water, b) economic and social costs, tangible and intangible, of the proposed discharge compared to benefits. The economic impacts to be considered are those incurred in order to maintain existing water quality. The financial impact analysis should focus on the ability of the facility to pay for the necessary treatment. The ability to pay depends on the facility’s source of funds. In addition to demonstrating a financial impact on the publicly – or privately – owned facility, the analysis must show a significant adverse impact on the community. The long-term and short-term socioeconomic impacts of maintaining existing water quality must be considered. Examples of social and economic parameters that could be affected are employment, housing, community services, income, tax revenues and land value. To accurately assess the impact of the proposed project, the projected baseline socioeconomic profile of the affected community without the project should be compared to the projected profile with the project...EPA’s Water Quality Standards Handbook (Chapter 5) provides additional guidance in assessing financial and socioeconomic impacts”

There is nothing resembling an economic or socioeconomic analysis in the Order. There are viable alternatives that have never been analyzed. The Discharger could continue with current land disposal or connect to a regional facility. The evaluation contains no comparative costs. As a rule-of-thumb, USEPA recommends that the cost of compliance should not be considered excessive until it consumes more than 2% of disposable household income in the region. This threshold is meant to suggest more of a floor than a ceiling when evaluating economic impact. In the Water Quality Standards Handbook, USEPA interprets the phrase “necessary to accommodate important economic or social development” with the phrase “substantial and widespread economic and social impact.”

The antidegradation analysis must discuss the relative economic burden as an aggregate impact across the entire region using macroeconomics. Considering the intrinsic value of the Delta to the entire state and the potential effects upon those who rely and use Delta waters, it must also evaluate the economic and social impacts to water supply, recreation, fisheries, etc. from the Discharger’s degradation of water quality in the Delta. Nor has the case been made that there is no alternative for necessary housing other than placing it where its wastewater must discharge directly into sensitive but seriously degraded waters. It is unfortunate that the agency charged with implementing the Clean Water Act has apparently decided it is more important to protect the polluter than the environment.

There is nothing in the Order resembling an alternatives analysis evaluating less damaging and degrading alternatives. There is nothing resembling an analysis buttressing the unsupported claim that BPTC is required. An increasing number of wastewater treatment plants around the country and state are employing reverse-osmosis (RO), or even RO-plus. Clearly, micro-filtration can be considered BPTC for wastewater discharges of impairing pollutants waters already suffering serious degradation. If this is not the case, the antidegradation analysis must explicitly detail how and why run-of-the-mill tertiary system that facilitate increased mass loadings of impairing constituents can be considered BPTC.

The Order indicates that the Discharger will use chlorination to disinfect the wastewater. Chlorination increases that amount of chlorides in the wastewater. In comparison, UV systems reduce the concentration of chlorides in the effluent and therefore also reduce the concentration of TDS. Additional chemicals containing chloride will be used by the WWTP to enhance coagulation. Chlorination of wastewater is known to create trihalomethane. The UV system would also reduce the concentration of trihalomethane in the effluent compared to chlorination. Given the site specific factors, chlorination does not qualify as BPTC.

The State Board has clearly articulated its position on increased mass loading of impairing pollutants. In Order WQ 90-05, the Board directed the San Francisco Regional Board on the appropriate method for establishing mass-based limits that comply with state and federal antidegradation policies. That 1990 order stated “[I]n order to comply

with the federal antidegradation policy, the mass loading limits should also be revised, based on mean loading, concurrently with the adoption of revised effluent limits. The [mass] limits should be calculated by multiplying the [previous year's] annual mean effluent concentration by the [four previous year's] annual average flow. (Order WQ 90-05, p. 78). USEPA points out, in its 12 November 1999 objection letter to the San Francisco Regional Board concerning Tosco's Avon refinery, that "[a]ny increase in loading of a pollutant to a water body that is impaired because of that pollutant would presumably degrade water quality in violation of the applicable antidegradation policy."

The Order allows for the discharge of waste to a new land application area and therefore, is a significant increase in mass loading of waste, most of which was not even sampled and analyzed for in the RWD.

14. Revise Order Must Contain Recycling Permit Conditions

The proposed Order fails to implement CWC Section 13523.1(b) for recycled water permits. In particular, CWC Section 13523.1 (b) requires a Recycled Water Permits to include all of the following:

- a. A requirement that the permittee comply with the uniform statewide reclamation criteria established pursuant to Section 13521 (Title 22). Permit conditions for a use of reclaimed water not addressed by the uniform statewide water reclamation criteria shall be considered on a case-by-case basis.
- b. A requirement that the permittee establish and enforce rules or regulations for reclaimed water users, governing the design and construction of reclaimed water use facilities and the use of reclaimed water, in accordance with the uniform statewide reclamation criteria established pursuant to Section 13521.
- c. A requirement that the permittee submit a quarterly report summarizing reclaimed water use, including the total amount of reclaimed water supplied, the total number of reclaimed water use sites, and the locations of those sites, including the names of the hydrologic areas underlying the reclaimed water use sites.
- d. A requirement that the permittee conduct periodic inspections of the facilities of the reclaimed water users to monitor compliance by the users with the uniform statewide reclamation criteria established pursuant to Section 13521 and the requirements of the master reclamation permit.

15. MRP Problems

The Monitoring Program fails to require the Discharger to monitor for all waste constituents that may impact the groundwater (see Finding No. 5 & 6). The Order contends that the Discharger will have alarms and continuous monitoring equipment to avoid upsets; however, the Order does not require continuous monitoring for chlorine, pH and ammonia. Continuous monitoring equipment is relatively inexpensive and is clearly

BPTC. The monitoring does not require the Discharger to report fertilizer application or other soil amendments with the nitrogen loading calculations. Therefore, the amount of nitrogen cannot accurately be monitored. The same constituents monitored in the effluent must be sampled in the influent if removal rates are to be calculated. These are necessary in order to show that WWTP is operated properly.

The proposed Order fails to require the Discharger to monitor the application area to ensure that waste is applied at agronomic rates. Monitoring should include fertilizers as shown below:

a. Golf course reclamation monitoring

The Discharger must monitor reclamation activities at the golf course in accordance with the following: 1) reclamation monitoring shall be performed daily and the results shall be included in the monthly monitoring report; 2) erosion, ground saturation, tailwater runoff, reclaimed water storage lake overflows, and nuisance conditions shall be noted in the report; 3) reclaimed water shall also be monitored to determine loading rates at the golf courses. Reclamation monitoring must include the following:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Sampling Frequency</u>	<u>Reporting Frequency</u>
Flow to irrigation areas	gpd	Continuous	Daily	Monthly
Rainfall	inches	Measurement	Daily	Monthly
Acreage Applied ¹	acres	Calculated	Daily	Monthly
Water Application Rate:				
Reclaimed water	gal/acre/day	Calculated	Daily	Monthly
Fresh water	gal/acre/day	Calculated	Daily	Monthly
Nitrogen Loading Rate ²	lbs/ac/month	Calculated	Monthly	Monthly
Dissolved Solids Loading Rate	lbs/ac/month	Calculated	Monthly	Monthly

1 Specific irrigation areas shall be identified.

2 Including chemical fertilizers.

b. Groundwater Monitoring

The Order fails to require the installation of an appropriate groundwater-monitoring network that is sufficient to detect degradation. The Order must be revised to require groundwater monitoring.

Thank you for considering these comments. If you have questions or require clarification, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Jennings". The signature is written in a cursive style with a large, prominent initial "B".

Bill Jennings, Executive Director
California Sportfishing Protection Alliance