From: Matt St. John
To: Sharpe, Laura
Date: Fri, Sep 6, 2002 2:44 PM
Subject: Re: New Fact Sheets

Hi Laura,

Attached are fact sheets for Redwood Creek (sediment) and Mattole (sediment and temperature). I hope these meet your needs. Please call with questions.

Have a great weekend.

Matt St. John
Water Resources Control Engineer

TMDL Unit
(707) 570-3762
(707) 523-0135 Fax
stjom@rb1.swrcb.ca.gov

North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403

>>> Laura Sharpe 08/23/02 08:53AM >>>
Good Morning Matt,
Attached you'll find the fact sheet templates that I referred to in my phone message to you moments ago. They need to be completed for the old listings... Redwood Creek and Mattole River. Please give me a call when you receive these and we can discuss this issue. Thanks. I hope you had a nice time in Maine and Connecticut on your vacation.

Respectfully,
Laura Sharpe

Laura J. Sharpe
Environmental Scientist
Division of Water Quality
State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA. 95814
phone: (916) 341-5596
fax: (916) 341-5550

Fact Sheet for SWRCB Staff Report

Redwood Creek

Original Listing Date: 1993
Est. TMDL Completion Date: 7/07

Water Body	Redwood Creek
Stressor/Media/Beneficial Use	Sediment/Water/Cold Freshwater Habitat; Spawning, Reproduction, and/or Early Development; Rare, Threatened, or Endangered Species
Data quality assessment. Extent to which data quality requirements met.	Data with a QA/QC plan were given the greatest weight.
Linkage between measurement endpoint and beneficial use or standard	In-stream sediment indicators linked to salmonid habitat requirements.
Utility of measure for judging if standards or uses are not attained	Basin Plan water quality objectives for sediment, settleable solids, and turbidity; published sediment thresholds from peer reviewed literature.
Water Body-specific Information	1975-1995: particle size distribution data; 1977-1999: channel morphology data; 1973-2000 suspended sediment data; 1999 turbidity data; 2002 road inventory data.
Data used to assess water quality	Fine sediment loads exceed TMDL thresholds, particularly in the lower watershed. Channel morphology responsive/ vulnerable to increased flows and input of upslope sediment. Suspended sediment loads do not consistently meet TMDL threshold. Road densities throughout basin exceed densities protective of water quality. 15% of roads have been decommissioned, and 6% have been upgraded.
Spatial representation	Targeted 4 to 15 sites (depending on variable) throughout 282 square mile watershed.
Temporal Representation	Data collected over 25 year period.
Data Type	Numerical data.
Use of standard method	USGS sampling. Peer-reviewed monitoring/sampling techniques.
Potential Source(s) of Pollutant	Harvest-related erosion, road-related surface erosion, gullies, and road crossing failures, and natural landslides.
Alternative Enforceable Program	None
RWQCB Recommendation	Maintain Listing
SWRCB Staff Recommendation	Maintain Listing

Fact Sheet for SWRCB Staff Report

Mattole River

Original Listing Date: 1993
Est. TMDL Completion Date: 1/06

Water Body	Mattole River
Stressor/Media/Beneficial Use	Sediment and Temperature/Water/Cold Freshwater Habitat; Spawning, Reproduction, and/or Early Development; Rare, Threatened, or Endangered Species
Data quality assessment. Extent to which data quality requirements met.	Data with a QA/QC plan were given the greatest weight.
Linkage between measurement endpoint and beneficial use or standard	In-stream sediment indicators linked to salmonid requirements. Temperature thresholds (MWAT) linked to salmonid sensitive life-stage requirements.
Utility of measure for judging if standards or uses are not attained	Basin Plan water quality objectives for sediment, settleable solids, and turbidity; published sediment thresholds from peer reviewed literature, aerial photo interpretation. Basin Plan water quality objective for temperature; Sullivan, et al 2000 published temperature thresholds, stream temperature modeling.
Water Body-specific Information	Analysis of 1941 to 2000 aerial photo sets. 2002 road and stream survey data. 1994-2001 stream temperature data. Riparian vegetation conditions throughout entire watershed. Thermal infrared survey of entire mainstem and six large tributaries. Water temperature data collected every 1-1.5 hours throughout summer.
Data used to assess water quality	Stream substrate parameters. Channel morphology responsive/vulnerable to increased flows and input of upslope sediment. Water temperature data collected every 1-1.5 hours throughout summer.
Spatial representation	Targeted 40 road and stream surveys; 44 square miles of aerial photo analysis, complete representation of current and potential stream shade conditions, thermal infrared survey of entire mainstem and six large tributaries; well distributed stream temperature monitoring.
Temporal Representation	Aerial photo data collected represents a 60 year period, stream temperature data collected over seven years.
Data Type	Numeric data, aerial photo analysis, measured instream parameters, remotely gathered thermal infrared and vegetation coverages.
Use of standard method	Forest Science Project stream temperature data collection protocol, WA State Watershed Analysis Manual.
Potential Source(s) of Pollutant	Road construction, timber harvest activity, livestock grazing, and natural sources.
Alternative Enforceable Program	None.
RWQCB Recommendation	Maintain Listing
SWRCB Staff Recommendation	Maintain Listing

From: Matt St. John
To: Sharpe, Laura; Wilson, Craig J.
Date: Tue, Jul 30, 2002 10:15 AM
Subject: Response to 303(d) comments

Craig:

Region One's responses to the 303(d) comment letters are attached. Hard copy to follow. Please call me with questions. I will be on vacation for two weeks starting this Friday (8/2).

Sincerely,

Matt St. John
Water Resources Control Engineer

TMDL Unit
(707) 570-3762
(707) 523-0135 Fax
stjom@rb1.swrcb.ca.gov

North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403

CC: Smith.davidw@epa.gov

July 30, 2002

Craig J. Wilson
SWRCB-DWQ
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Response to Comments on 2002 303(d) List Update
File: Water Quality – TMDL – 2002 303(d) List Update

Dear Mr. Wilson:

Staff of the North Coast Regional Water Quality Control Board have reviewed all comment letters (1.1 – 1.35 and 10.11) related to Region One, as well as additional data/information submitted prior to June 15, 2002, and provide the following comments. The majority of the comment letters and data/information do not change the recommendations presented in our November 16, 2001 "303(d) List Update Recommendations" staff report and the January 31, 2002 letter "Board Member Clarification to Staff Recommendations for 303(d) Listings" from Susan Warner. Our comments reflect discussions between Ranjit Gill, David Leland, Matt St. John, and review by Susan Warner. Following general comments, we comment on specific letters identified by number.

General Comments

In preparing our November 16, 2001 303(d) List Update Recommendations report, we recommended putting a waterbody/pollutant combination on a Watch List to highlight the need for additional monitoring/assessment. It was our intent that the Watch List would be separate from the 303(d) List, to be used by our office for prioritization of monitoring/ assessment. The Watch List is now being forwarded to US EPA by the State Water Board as part of the 303(d) List Update process. We are not certain how the Watch List will be used in this 303(d) List Update process. In light on this uncertainty, we have reassessed our Watch List recommendations, as reflected in our comments here.

Comment Letter 1.2, 1.15, and 1.17:

Laguna de Santa Rosa & Santa Rosa Creek – Copper, Chromium, Zinc

We have reviewed available copper, chromium, and zinc water quality and sediment data, including additional (new) data submitted by the City of Santa Rosa (Letter 1.17), collected from Santa Rosa Creek and Laguna de Santa Rosa. Comparison of these data to applicable criteria (maximum contaminant level, an agricultural criterion, public health goals, aquatic life criterion, and California Toxic Rule criteria) shows that all available data are below applicable criteria. Our previous assessment did not include comparison to CTR. The City of Santa Rosa continues to monitor both Santa Rosa Creek and the

Laguna de Santa Rosa for these metals, and the Regional Water Board will continue to review the results when available. Based on our review, we determine that Santa Rosa Creek and Laguna de Santa Rosa do not warrant listing on the Watch List for copper, chromium, and zinc.

Russian River & Santa Rosa Creek – Diazinon

The City of Santa Rosa suggests that Santa Rosa Creek should not be "singled out" for listing on the Watch List for diazinon. Monitoring of pesticides in Santa Rosa, Montanzas, Piner, Peterson, Brush Creeks in November 1999 by the City of Santa Rosa were non-detect for all pesticides, including diazinon. As presented in our November 16, 2002 303(d) List Update Recommendations report, a 1997 Department of Pesticide Regulations study reported two of fifty two samples from the Russian River above the reporting limit, at concentrations above that believed to be detrimental to freshwater organisms. Based on this information, we suggest placing the Russian River watershed on the Watch List for diazinon, but not specifying individual tributaries.

Laguna de Santa Rosa – Nutrients

In our November 16, 2002 303(d) List Update Recommendations report, we were in error in referring to a US EPA "criterion" of 0.1 mg/L for total phosphorus. This total phosphorus concentration is in fact a "desired goal" for the prevention of plant nuisances in streams or other flowing waters not discharging directly to lakes or impoundments.

Comment Letter 1.9:

Our comments presented on Letters 1.2 and 1.17 apply also to Letter 1.9.

Russian River – Pathogens

The boundaries for the Monte Rio-area pathogen listing (from the confluence of Dutch Bill Creek to the confluence of Fife Creek) were identified due to suspected potential sources from the communities of Monte Rio, Camp Meeker, Guerneville Park, and Guerneville. Though the pathogen listing recommendations for the Monte Rio area and Healdsburg Memorial Beach were based on monitoring conducted only during the summer season, it is not known whether the impairment is limited to this season. Therefore, it is appropriate for the listing to apply to all seasons.

Comment Letter 1.14:

Redwood Creek – Sediment and Temperature

We wish to clarify that Regional Water Board staff have reviewed all available data and information on Redwood Creek.

Comment Letter 1.32:

Regional Water Board staff have reviewed all available temperature data for the Ten Mile River, including all data presented in the final KRIS Ten Mile (April 2002). As stated in the November 16, 2001 staff report "A determination not to list a sub-basin was reached if at least three years of monitoring data were available from more than one representative location within the sub-basin and the MWAT values from these data sets were nearly all below the 14.8°C threshold. Careful consideration was given to the location of the monitoring stations within the sub-basin, as well as the location of the sub-basin within the entire watershed, with particular attention to possible coastal influence on stream temperatures."

A review of all of the available temperature data (1993-2001) shows that a few sub-basins have more than one monitoring location and meet the above screening criteria not to list. These sub-basins include the Little North Fork, including Buckhorn Creek, and Bear Haven Creek. There are, however, a number of other tributaries that demonstrate Maximum Weekly Average Temperatures (MWAT) below 14.8°C during at least three summers, including Mill Creek, Little Bear Haven, Booth Gulch, Ford Gulch, Smith Creek, Gulch 11, Campbell Creek, Churchman Creek, Gulch 3, Hidden Gulch, and Vallejo Gulch. These tributaries all lie within the coastal zone that experiences regular fog. No mainstem stations on the North, Middle, or South Forks meet the screening criteria not to list.

On January 23, 2002, the Regional Water Board held a public meeting to consider the actions recommended by the staff in the November 16, 2001 "303(d) List Update Recommendations". After considerable discussion, the Board determined that insufficient information existed to support recommended listings for temperature for the Ten Mile River (as well as the Gualala River, Big River, Mad River, and Redwood Creek). The Board recommended that these waterbodies be placed on our Watch List for temperature. No new data has been presented to date that the Board would not have considered when making their recommendation.

Comment Letter 10.11:

Our comments on copper, chromium, and zinc in Santa Rosa Creek and the Laguna de Santa Rosa presented for Letters 1.2 and 1.17 also apply to Letter 10.11. The following comments apply to Comment Letter 10.11 Enclosure 3.

Lake Sonoma – Mercury

Fish tissue samples from Lake Sonoma have been analyzed for trace elements and organic chemicals under the Toxic Substances Monitoring Program. In addition to identifying the total number of samples analyzed, mercury levels in fish filets that exceed selected criteria are summarized here (presented as ppm, wet weight):

1993: three samples; 0.50, 0.88
1995: two samples; 0.57, 1.80
1999: six samples; 0.595, 0.501, 0.513, 0.461, 0.559, 0.840

The Median International Standard for mercury (edible portion, ppm, wet weight) is 0.5. The National Academy of Sciences Recommended Guideline for Freshwater Fish is 0.5 for mercury (whole fish, ppm, wet weight). The U.S. Food and Drug Administration Action Level for Freshwater Fish is 1.0 for mercury (edible portion, ppm, wet weight). The U.S. EPA Tissue Residue Criterion for mercury is 0.3 ppm. The Office of Environmental Health Hazard Assessment's guidelines for tissue levels for consumption rates of one meal per month range from 0.21 to 0.87 ppm.

Nine composite fish tissue samples were collected from Lake Sonoma in September 2001. These samples have not yet been analyzed. Barring a significant shift in the fish tissue levels from these samples, Dr. Margy Gassel of OEHHA suspects that OEHHA will issue a fish advisory for Lake Sonoma (Personal communication, June 27, 2002).

Comparison of the available fish tissue data from Lake Sonoma to the standards and criteria presented above meets listing factor #5[1] from the 1998 Clean Water Act Section 303(d) Listing Guidelines for California (August 11, 1997).

Lake Mendocino – Mercury

Fish tissue samples from Lake Mendocino have also been analyzed for trace elements and organic chemicals under the Toxic Substances Monitoring Program. In addition to identifying the total number of samples analyzed, mercury levels in fish filets that exceed selected criteria are summarized here (presented as ppm, wet weight):

1993: three samples; no exceedences
1999: three samples; 0.346, 0.517, 0.651

Six composite fish tissue samples were collected from Lake Mendocino in September 2001. These samples have not yet been analyzed. Barring a significant shift in the fish tissue levels from these samples, Dr. Margy Gassel of OEHHA suspects that OEHHA will issue a fish advisory for Lake Mendocino (Personal communication, June 27, 2002). Comparison of the available fish tissue data from Lake Mendocino to the standards and criteria presented above meets listing factor #5 from the 1998 Clean Water Act Section 303(d) Listing Guidelines for California (August 11, 1997).

[1] Data indicate tissue concentrations in consumable body parts of fish or shellfish exceed applicable tissue criteria or guidelines. Such criteria or guidelines may include SWRCB Maximum Tissue Residue Level values, FDA Action Levels, NAS Guidelines, and US EPA tissue criteria for the protection of wildlife, as they become available.

Elk, Mallo Pass, Brush, Alder, Greenwood, Cottaneva, Hardy, Juan, Howard, Dehaven, Wages, Usal Creeks, and Schooner Gulch – Sediment

All available sediment-related data for Elk, Mallo Pass, Brush, Alder, Greenwood, Cottaneva, Hardy, Juan, Howard, Dehaven, Wages, Usal Creeks, and Schooner Gulch was presented in our November 16, 2001 "303(d) List Update Recommendations" staff report. Minimal in-stream data is available for these streams; there is no additional readily available data and information.

Given the heightened level of scrutiny on the 303(d) list update process, we only recommended adding waterbodies to the 303(d) list when quantitative water quality data was available, which was not the case for the Mendocino coastal streams listed above. These streams have similar geology and timber harvest histories to other Mendocino Coast streams (Garcia, Navarro, Big, and Ten Mile Rivers) that are currently on the 303(d) List for impairments to cold water fisheries. Most of the streams listed above (Schooner Gulch, Cottaneva, Hardy, Juan, Howard, Dehaven and Wages Creeks) have high road densities relative to other Mendocino Coast streams. All of these streams provide habitat for steelhead salmon, and most provided historic habitat for coho salmon, both threatened species under the federal Endangered Species Act. In our November 16, 2001 staff report we recommended that these streams be placed to the Watch List. This decision was based on the circumstantial land management conditions and salmonid presence information described above, as well as the best professional judgement of Regional Water Board staff involved with timber harvest plan review who characterize these streams as having poor in-stream sediment conditions. The intent of placing these streams on the Watch List was to promote monitoring/assessment of in-stream sediment conditions in these streams.

Humboldt Bay & Mad River Slough – PCBs and Dieldrin

All available shellfish tissue level data for Total PCBs and dieldrin are far below FDA Action Levels.

Klamath River – Sediment

As mentioned in our November 16, 2001 "303(d) List Update Recommendations" staff report, Regional Water Board staff have suggested that beneficial uses may be impaired in portions of the mainstem Klamath (particularly in the lower Klamath River) and tributaries to the Klamath River (Beaver Creek and tributaries to the Klamath below the confluence with the Trinity River have been specifically identified) due to excessive sediment loading and instream sediment conditions. There is no readily available in-stream sediment data to corroborate this assertion; therefore, we recommended the Klamath River be placed on the Watch List for sediment.

Trinity River – Mercury

Our November 16, 2001 staff report referred to an active USGS study evaluating the impact of abandoned mines in the Trinity River watershed. Since that time additional data has been collected. Though USGS has not released a final report, preliminary data has been presented on their web site (http://ca.water.usgs.gov/mercury/trinity/abstract.html), as summarized here.

Game fish were collected during 2000-2001 from sites in the Trinity River watershed: 4 locations within Trinity Lake, 11 stream sites, and 3 pond sites. Of 258 total fish collected, 153 have been analyzed to date. Total mercury in 69 black bass ranged from 0.12 to 1.22 ppm wet weight. Mercury concentrations in 76 percent of the 34 black bass of "legal catch size" (≥ 305 mm in length) were ≥ 0.3 ppm wet weight, which is the US EPA water quality criterion for protection of human health. Mercury concentrations exceeded 1.0 ppm (the Food and Drug Administration action level for commercial fish) in 9 percent of the legal size black bass. All 41 trout samples from stream sites had mercury concentrations < 0.3 ppm wet weight. The Trinity County Health Services Department released an "Interim Fish Consumption Notification for Trinity River Watershed" in June 2002. Additional water quality monitoring and biota sampling is to be conducted through 2003 by USGS, with support from the North Coast Regional Water Board.

Shasta River – Sediment

All readily available sediment-related data from the Shasta River was summarized in our November 16, 2001 staff report. The mean percent fines data in the lower Shasta River showed an improving trend from 1994 to 1997. Based on this data, it was not clear that sediment conditions are causing impairment in the Shasta River.

Tule Lake/Lower Klamath Lake National Wildlife Refuge/Lower Lost River – Dissolved Oxygen and Un-Ionized Ammonia

All readily available dissolved oxygen and ammonia data from Tule Lake/Lower Klamath Lake National Wildlife Refuge/Lower Lost River was summarized in our November 16, 2001 staff report. It was our interpretation that the relatively small quantity of data, as well as the temporal and spatial distribution of the data, was insufficient to support a listing decision. Tule Lake and the Lost River are on the 303(d) List for nutrients and temperature. We are actively conducting monitoring in support of these TMDLs, including assessment of dissolved oxygen and ammonia concentrations.

Should you have any questions about these comments, please do not hesitate to call me (707-570-3762).

Sincerely,

Matt St. John
Water Resource Control Engineer

Cc: Dave Smith, US EPA IX

California Regional Water Quality Control Board
North Coast Region
William R. Massey, Chairman

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

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Phone: 1 (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

July 30, 2002

Craig J. Wilson
SWRCB-DWQ
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Response to Comments on 2002 303(d) List Update
File: Water Quality – TMDL – 2002 303(d) List Update

Dear Mr. Wilson:

Staff of the North Coast Regional Water Quality Control Board (Regional Water Board) have reviewed all comment letters (1.1 – 1.35 and 10.11) related to Region One, as well as additional data/information submitted prior to June 15, 2002, and provide the following comments. The majority of the comment letters and data/information do not change the recommendations presented in our November 16, 2001 "303(d) List Update Recommendations" staff report and the January 31, 2002 letter "Board Member Clarification to Staff Recommendations for 303(d) Listings" from Susan Warner. Our comments reflect discussions between Ranjit Gill, David Leland, Matt St. John, and review by Susan Warner. Following general comments, we comment on specific letters identified by number.

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(maximum contaminant level, an agricultural criterion, public health goals, aquatic life criterion, and California Toxic Rule criteria) shows that all available data are below applicable criteria. Our previous assessment did not include comparison to CTR. The City of Santa Rosa continues to monitor both Santa Rosa Creek and the Laguna de Santa Rosa for these metals, and the Regional Water Board will continue to review the results when available. Based on our review, we determine that Santa Rosa Creek and Laguna de Santa Rosa do not warrant listing on the Watch List for copper, chromium, and zinc.

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Elk, Mallo Pass, Brush, Alder, Greenwood, Cottaneva, Hardy, Juan, Howard, Dehaven, Wages, Usal Creeks, and Schooner Gulch – Sediment

All available sediment-related data for Elk, Mallo Pass, Brush, Alder, Greenwood, Cottaneva, Hardy, Juan, Howard, Dehaven, Wages, Usal Creeks, and Schooner Gulch was presented in our November 16, 2001 "303(d) List Update Recommendations" staff report. Minimal in-stream data is available for these streams; there is no additional readily available data and information.

Given the heightened level of scrutiny on the 303(d) list update process, we only recommended adding waterbodies to the 303(d) list when quantitative water quality data was available, which was not the case for the Mendocino coastal streams listed above. These streams have similar geology and timber harvest histories to other Mendocino Coast streams (Garcia, Navarro, Big, and Ten Mile Rivers) that are currently on the 303(d) List for impairments to cold water fisheries. Most of the streams listed above (Schooner Gulch, Cottaneva, Hardy, Juan, Howard, Dehaven and Wages Creeks) have high road densities relative to other Mendocino Coast streams. All of these streams provide habitat for steelhead salmon, and most provided historic habitat for coho salmon, both threatened species under the federal Endangered Species Act. In our November 16, 2001 staff report we recommended that these streams be placed to the Watch List. This decision was based on the circumstantial land management conditions and salmonid presence information described above, as well as the best professional judgement of Regional Water Board staff involved with timber harvest plan review who characterize these streams as having poor in-stream sediment conditions. The intent of placing these streams on the Watch List was to promote monitoring/assessment of in-stream sediment conditions in these streams.

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Trinity River – Mercury

Our November 16, 2001 staff report referred to an active USGS study evaluating the impact of abandoned mines in the Trinity River watershed. Since that time additional data has been collected. Though USGS has not released a final report, preliminary data has been presented on their web site (http://ca.water.usgs.gov/mercury/trinity/abstract.html), as summarized here.

Game fish were collected during 2000-2001 from sites in the Trinity River watershed: 4 locations within Trinity Lake, 11 stream sites, and 3 pond sites. Of 258 total fish collected, 153 have been analyzed to date. Total mercury in 69 black bass ranged from 0.12 to 1.22 ppm wet weight. Mercury concentrations in 76 percent of the 34 black bass of "legal catch size" (≥ 305 mm in length) were ≥ 0.3 ppm wet weight, which is the US EPA water quality criterion for protection of human health. Mercury concentrations exceeded 1.0 ppm (the Food and Drug Administration action level for commercial fish) in 9 percent of the legal size black bass. All 41 trout samples from stream sites had mercury concentrations < 0.3 ppm wet weight. The Trinity County Health Services Department released an "Interim Fish Consumption Notification for Trinity River Watershed" in June 2002. Additional water quality monitoring and biota sampling is to be conducted through 2003 by USGS, with support from the North Coast Regional Water Board.

Shasta River – Sediment

All readily available sediment-related data from the Shasta River was summarized in our November 16, 2001 staff report. The mean percent fines data in the lower Shasta River showed an improving trend from 1994 to 1997. Based on this data, it was not clear that sediment conditions are causing impairment in the Shasta River.

Tule Lake/Lower Klamath Lake National Wildlife Refuge/Lower Lost River – Dissolved Oxygen and Un-Ionized Ammonia

All readily available dissolved oxygen and ammonia data from Tule Lake/Lower Klamath Lake National Wildlife Refuge/Lower Lost River was summarized in our November 16, 2001 staff report. It was our interpretation that the relatively small quantity of data, as well as the temporal and spatial distribution of the data, was insufficient to support a listing decision. Tule Lake and the Lost River are on the 303(d) List for nutrients and temperature. We are actively conducting monitoring in support of these TMDLs, including assessment of dissolved oxygen and ammonia concentrations.

Should you have any questions about these comments, please do not hesitate to call me (707-570-3762).

Sincerely,

Matt St. John
Water Resource Control Engineer

MSJ:clh/303dcomments_Jly30_02

Cc: Dave Smith, US EPA IX

2002 303(d) List Update
Reference #46

From: "Gene" <murray@saber.net>
To: <StjoM@rb1.swrcb.ca.gov>
Date: 4/1/01 2:34PM
Subject: Public Solicitation of Water Quality Information

Dear Mr. St. John:

In reference to solicitation of information for the EPAs April 2002 submission by NCRWQCB for the Clean Water Act Sec. 303(d), I am submitting the following information:

1) The book Natural Capitalism by Amory Lovins and the Rocky Mt. Institute says that US utility industries, including wastewater and water utilities

"...will take decades to recover from the financial consequences of doctrinaire gigantism... the whole system that comprises classical central sewage-treatment plants and their farflung collection sewers--each piece optimised in isolation--is far costlier than such local or even on-site solutions as biological treatment." p. 131.

An entire chapter of the book is devoted to water and wastewater issues. The NCWQCB would do well to read this book.

2) With AB 885 (1999) requirements due by 2004 for on-site wastewater treatment regulations, your board will do the public a service by eliminating the regionalism regulations of the laws such as in the Health and Safety Code Sec. 116760.10 f(2) that says projects that supply or attract growth shall not be eligible for Safe Drinking Water fund monies while Sec. 116760.10 (g) says that regional solutions are the most economical, effective, etc. Regionalism is just another word for doctrinaire gigantism and it perpetuates the problems of the West County ever being able to fund clean water and effective wastewater-treatment solutions, especially in the Occidental and Camp Meeker areas.

3) Staff Member Charles Reed's letter to me regarding the ability of Living Machines (see www.livingmachines.com) to be used in the West County seems to say that these tertiary on-site systems will be precluded bureaucratically due to the assessment of the "...potential threat to water quality (of such systems)" see his letter to me dated March 15, 2001. It was my assumption that such tertiary systems were a potential HELP to solve water quality problems and not considered a THREAT. Maybe to the state bureacrats they are a threat.

Your inclusion of my comments to the EPA is greatly appreciated since they tried to audit SCWAs Guerneville sewer project in the mid-'80s. See Press Democrat Aug. 7th-9th, 1983 "Broken Pipe Dream".

Sincerely yous and Respectfully submitted,
Gene Koch
PO Box 824
Occidental, CA 95465

CC: <virginia.strom-martin@assembly.ca.gov>

From: Matt St. John
To: Leland, David; Wilson, Craig J.
Date: 2/19/02 11:43AM
Subject: Re: 303(d) Letter

Hello Craig,

The attached table provides a summary of the amount of temperature data reviewed for the Russian, Gualala, Big, Ten Mile, and Mad Rivers, and Redwood Creek. All of the temperature data sets used in our analysis were hourly measurements over the summer months (usually mid-May thru mid-September) from continuous data loggers. The data was collected from different agencies or land owners, as described in our November 16 staff report. To the best of our knowledge, all of the data met equivalent QA/QC proceedures.

The approach used by staff in analyzing the data, and the rationale for developing temperature listing recommendations, was identical for all of the waterbodies. Based on these considerations, staff is not aware of any difference between the Russian River listing for temperature and the other five rivers.

As described in the November 16 staff report, staff recommended that all six waterbodies be added to the 303(d) List for temperature. As expressed in the January 31, 2002 letter from Susan Warner to Celeste Cantu, the Regional Board concluded at our January 23 Board Meeting that there was insufficient information to support staff's recommended listings for temperature for the Gualala River, Big River, Ten Mile River, Mad River and Redwood Creek, and recommended that these waterbodies be placed on the Watch List. The Board supported staff's recommendation to list the Russian River for temperature. We are in the process of transcribing the January 23 Board Meeting, and will provide a copy of the transcription as soon as possible.

Please call me with any questions.

Sincerely,

Matt St. John
Water Resources Control Engineer

TMDL Unit
(707) 570-3762
(707) 523-0135 Fax
stjom@rb1.swrcb.ca.gov

North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403

>>> Craig J. Wilson 02/13/02 03:01PM >>>
Matt/David,

Thanks for sending us a copy of the Region's letter regarding the 303(d) listings for temperature. We will change the RWQCB recommendations for the 5 rivers to "Watch List" as stated.

I have a question about the Russian River listing. It seems that substantially the same amounts and kinds of data and information were used for the Russian River as for the other 5 rivers. **How is the Russian River listing different from the other 5? In other words, what is the reason for listing the Russian**

River and not the others?

I know this is a difficult issue for you. Please send a written response (email is OK) ASAP so we can finish off our staff report. Thanks....

CJWilson
(916) 341-5560
email: wilscj@dwq.swrcb.ca.gov
AB 982 Web Page: http://www.swrcb.ca.gov/ab982/index.html
Electronic Mail List: http://swrcb8.swrcb.ca.gov/lyrisswrcb/

CC: Gill, Ranjit; Sharpe, Laura; Warner, Susan

Summary of Temperature Data Reviewed by North Coast RWQCB Staff for 303(d) List Update

Waterbody	# of Sites	# of Data Sets	# of Years of Data
Russian River	33	54	5
Big River	34	41	4
Ten Mile River	37	165	7
Gualala River	62	169	8
Mad River	32	51	5
Redwood Creek	31	72	9