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303 (d) Deadline: 1/31/06

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January 12, 2006

Selcia Potter, Acting Clerk to the Board  
State Water Resources Control Board  
Executive Office  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, California 95814

**RE: REVISION TO FEDERAL CLEAN WATER ACT SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENTS FOR CALIFORNIA**

Dear Ms. Potter:

The Sonoma County Water Agency (SCWA) has prepared this letter in response to the proposed revisions to the Federal Clean Water Act Section 303(d) List of Water Quality Limited Segments for California. SCWA understands that the finalized 2006 section 303(d) list is due to the United States Environmental Protection Agency by April 2006.

SCWA is a special district that provides wholesale water supply to approximately 570,000 people in Marin and Sonoma Counties. SCWA operates 5 collector wells and 7 conventional wells adjacent to the Russian River in western Sonoma County. SCWA also operates 7 wastewater treatment plants and provides flood control services in Sonoma County.

SCWA has taken a proactive role in improving water quality in the Russian River watershed. SCWA has funded numerous erosion and sediment reduction projects through its Fisheries Enhancement Program, updated its flood control maintenance practices, and funded the recent revisions to the Russian River Basin Plan. In addition, SCWA is currently involved in a multi-year cooperative study with the U.S. Geological Survey conducting a detailed water quality investigation of the Lower Russian River Basin, evaluating both traditional (e.g., major inorganic compounds, nutrients and selected trace metals) and emerging water quality issues (e.g., pharmaceutically active compounds). The study area starts at the southeast boundary of the Russian River plain (approximately one mile south of the city of Healdsburg) and concludes at the estuary near Jenner. Results for monitoring activities conducted in 2003 and 2004 will be available in a USGS open-file report in early 2006.

SCWA supports a 303(d) listing process where the water quality impairment is clearly and appropriately identified through adopted water quality objectives, adequate data and when total maximum daily loads (TMDLs) can be developed that will effectively improve water quality in a reasonable time period.

SCWA would like to provide comment to one of the State Board Staff recommendations and request clarification regarding the following: (1) Placing Santa Rosa Creek on the 2006, 303(d) list for specific conductance; and (2) Clarification of terminology for which water segments are recommended for listing.

### SANTA ROSA CREEK – SPECIFIC CONDUCTANCE LISTING RECOMMENDATION

The State Water Resource Control Board's (SWRCB) Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy) states:

“Waters shall be placed in this category of the section 303(d) list if it is determined, in accordance with the California Listing Factors, that the water quality standard is not attained; the standards non-attainment is due to toxicity, a pollutant, or pollutants; and remediation of the standards attainment problem requires one or more TMDLs.”

The listing of Santa Rosa Creek for specific conductance was based on sample results exceeding Basin Plan objectives for specific conductance. However, the only Basin Plan specific conductance objectives for the Russian River Hydrologic Unit are for the upper and lower main stem Russian River. The objective applied to Santa Rosa Creek is that for the upper Russian River. The footnote for this objective in the Basin Plan states “Russian River (upstream) refers to the main stem river upstream of its confluence with Laguna de Santa Rosa.” Santa Rosa Creek is not a tributary to the water to which the objective applies. Thus, using this objective as a basis for including Santa Rosa Creek on the 303(d) list for specific conductance is inconsistent with the Listing Policy and inappropriate.

### CLARIFICATION OF TERMINOLOGY

For Region 1, the State Board Staff Recommendations and the Fact Sheets identify the hydrologic area (HA) and hydrologic unit (HU) (as appropriate) for each individual water body segment. For example, the Fact Sheet listing mercury for the Laguna de Santa Rosa has the water segment identified as the Russian River HU, Middle Russian River HA, Laguna de Santa Rosa. Similarly, the Fact Sheet listing pH for Pocket Canyon has the water segment identified as the Russian River HU, Lower Russian River HA, Guerneville hydrologic sub-area (HSA). For other regions, only the specific water body is listed. This leads to two possible interpretations for Region 1 recommendations. Either only the specific water body is recommended for listing, or the water body and its HA, HU and HSA are also recommended for listing. In the Laguna de Santa Rosa example given above, it is not clear whether only the Laguna is recommended for listing or the Russian River HA and Middle Russian River HU are also recommended for listing. Please revise the State Board Staff Recommendations and Fact Sheets to clarify and be consistent with other Region recommendations.

Thank you for your consideration of the comments SCWA has provided. If you have any questions regarding these comments, please contact Don Seymour, P.E. at (707) 521-1808 or Pamela Jeane, P.E. at (707) 521-1864.

Sincerely,



Don Seymour, P.E.  
Water Agency Principal Engineer

c Pam Jeane, Kevin Booker, Randy Cullen, Jeff Church – Sonoma County Water Agency