CTY of Monterey

(735)

October 18, 2006

Song Her
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Her:

Subject: **Comment Letter – 2006 Federal CWA Section 303(d) List**

This letter serves to provide comments to the proposed 2006 303(d) List, ITEM 10, being presented to the State Water Resources Control Board on October 25, 2006.

The draft document represents many hours of work by SWRCB and RB3 Staff.

GENERAL COMMENTS
In addition to referencing the table "Proposed 2006 CWA Section 303(d) List of Water Quality Limited Segments, CCRWQCB", a reference map on the web page would have been helpful in reviewing the proposed 303d list, along with the Hydrologic Area numbers on the Fact Sheets for each water body.

Missing Fact Sheets: There are missing fact sheets for the following two water bodies and associated constituents:
Salinas Reclamation Canal   309.11010
- Fecal Coliform
- Low Dissolved Oxygen
- Pesticides
- Priority Organics

Old Salinas River Estuary   309.11010
- Fecal Coliform
- Low Dissolved Oxygen
- Nutrients
- Pesticides

Tembladero Slough   309.11010
- Ammonia (added 2006)
- Fecal Coliform
- Nutrients
- Pesticides

Listed Water Bodies as Municipal and Domestic Supply Beneficial Use
The following water bodies are listed with a Municipal and Domestic Supply (MUN) designation in the Central Coast RWQCB Basin Plan. However, under Beneficial Use Definitions for "MUN", **these water bodies may not meet the requirements for MUN Beneficial Use:** *The source is not sufficient to supply an average sustained yield of 200 gallons per day.*
- Gabilan Creek   309.19000
- Quail Creek   309.19000
- Santa Rita Creek   309.19000
- Natividad Creek   309.11010
- Alisal Creek   309.70093

Natividad Creek 309.11010 is listed in the incorrect category of Original Fact Sheets. It should reside under **New/Revised Fact Sheets**. This water body is not listed on the Central Coast Regional Board, Basin Plan, Chapter 2, Table 2-1, Identified Uses of Inland Surface and Inland Surface Waters, Sept. 8, 1994. Based on this, it is a newly proposed water body to the 303d list.

Tembladero Slough 309.1101 is not listed in the New or Revised Fact Sheets. Ammonia was added in 2006 as a POLLUTANT/STRESSOR. (See above under missing Fact Sheets)

Insufficient Current Data
Much of the data referred to on the fact sheets for the listed water bodies is not current, and may not reflect present conditions in the watershed. In the last few years, there has been considerable focus given to implementing improved management practices that reduce pollutant impact to surface waters of California. The Salinas Hydrologic Unit is primarily agriculture with some tributaries that flow through urbanized areas. Because of the recent efforts performed by growers related to the State-mandated Agricultural Discharge Waiver in Monterey County, along with increased implementation of irrigation management practices to reduce agricultural run off, it is felt that the limited surface water quality data from the early 2000's does not reflect current water quality for some constituents in the listed water bodies.

Gabilan Creek	309.19000	Data 1999-2000	Nitrate
Quail Creek	309.19000	Data 1999-2000	Nitrate
Santa Rita Creek	309.19000	Data 1999-2000	Nitrate
Natividad Creek	309.11010	2000	Nitrate
Moro Cojo Slough	309.13011	Data 1999-2000	Unionized Ammonia

Question

Two water bodies are listed for Beneficial Uses: Cold Fresh Water (CO) and Warm Fresh Water (WA).

Can one water body be both cold and warm freshwater at the same time?

- Moro Cojo Slough   309.13011

Area Change

Salinas Reclamation Canal   309.11010

Proposed Area Change – There is no indication in the Fact Sheet as to the existing or to the proposed size change for this water body. The Monterey County Water Resources Agency, who oversees watershed management in Monterey County, requests to review the proposed change with your staff. Please contact Manuel Quezada, Associate Water Resources Engineer, at 831.755.4860 to discuss.

Santa Maria River   312.10030

It is well documented that certain testing methods for **Diazinon and Chlorpyrifos**, depending on the matrix and associated chemicals present, organic and inorganic, may produce a result that has a positive bias. The method in question is the **Enzyme-Linked Immunosorbent Assay (ELISA)** method. It is felt that, if these tests on this water body were performed with the ELISA method, a false positive may occur, which could compromise the ability of the SWRCB to regulate the Santa Maria River for water quality. It is our recommendation that an absolute, unbiased testing for Chlorpyrifos be performed, utilizing **Gas Chromatograph/Mass Spectrophotometry (GC/MS)** protocol.

Enclosed are four documents that reference the above statement. Another option would be for one of your staff to call Dr. Frank Spurlock, CA Dept. of Pesticide Regulation, at 916.324.4124, for further discussion.

Document A:

DPR Agreement 0-168-130-0, Kozlowski et al, **Monitoring Chlorpyrifos and Diazinon in Impaired Surface Waters of the Lower Salinas Region,** March 31, 2004 (cover and two pages)

Document B:

Final Report Agreement No. 00-0183S **"Evaluation of Potential Interferences for a Diazinon ELISA Test Kit"** Hammock and Gee for Spurlock Dept. of Pesticide Regulation (DPR), Environmental Monitoring and Pest Management, October 2002 (entire document)

Document C:
>DPR Memorandum, January 13, 2002 **Study Summary: Evaluation of Interferences in Enzyme-Linked Immunosorbent Assay (ELISA) for Diazinon** (entire document)

Document D:
>**Evaluation and Validation of a Commercial ELISA for Diazinon in Surface Waters**, Sullivan and Goh, *J. Agric. Food Chem.* 2000, *48*, 4071-4078 (entire document)

Please feel free to follow up with me at 831.755.4860, if you have any questions regarding these comments.

Sincerely,

Kathleen Thomasberg
Program Manager II – Water Quality

Enclosures: (4)