



Established in 1918 as a public agency

Coachella Valley Water District

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May 27, 2010

Redwine and Sherrill, Attorneys

File: 0022.117
0551.1113

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Townsend:

Subject: Comment Letter – 2010 Integrated Report, Section 303(d) List

The Coachella Valley Water District (CVWD) appreciates the opportunity to provide comments on the subject proposed Section 303(d) List revisions. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage and regional stormwater protection services to a population of 265,000 throughout the Coachella Valley. CVWD recognizes the benefits of preparing an accurate Section 303(d) List so that limited resources can be applied to achieve the greatest benefit for water bodies with impaired beneficial uses.

Please find enclosed comments on the proposed new listings for the Coachella Valley Stormwater Channel and the Salton Sea. Your consideration of these comments is appreciated.

If you have any questions, please call Steve Bigley, Environmental Services Manager, extension 2286.

Yours very truly,

A handwritten signature in blue ink, appearing to read "Mark L. Johnson", with a long horizontal flourish extending to the right.

Mark L. Johnson
Director of Engineering

Enclosure/1/as

SB:ch/eng/wr/10/may/Integrated Report 2010 Comment s

Coachella Valley Water District
Comments on
Proposed 2010 Integrated Report: Clean Water Act Section 303(d) List of
Water Quality Limited Segments and Clean Water Act Section 305(b) Assessment of
Surface Water Quality

May 27, 2010

1. Proposed impaired water listing for the Coachella Valley Storm Water Channel for DDT. The State Water Resources Control Board (SWRCB) is scheduled to consider listing the Coachella Valley Storm Water Channel (CVSC) as impaired for DDT based on a single line of evidence consisting of fish tissue test results. Fish tissue samples were collected from the CVSC at a single location near Mecca. DDT was not detected above a water quality objective in water or sediment samples collected from the CVSC.

The proposed listing is based on the results of tests performed on 12 fish tissue samples collected over a 15 year period beginning in 1986 and ending in 2000. The results of tests performed over many years are being combined to support this proposed listing. However, no fish tissue samples have been collected during the past 10 years to evaluate the existing conditions in this water segment. The weight of evidence fails to provide existing water impairments for DDT in this water segment. This water segment was not listed for DDT following reviews performed in 2002, 2004 and 2006 and no new data is available to make a different determination following the 2008 review.

Since the weight of evidence provided in the proposed listing does not represent existing conditions, CVWD requests that the SWRCB reject the recommendation for listing the CVSC as impaired for DDT without presenting new evidence representative of existing conditions in the CVSC.

2. Proposed impaired water listing for the CVSC for Dieldrin. The SWRCB is scheduled to consider listing the CVSC as impaired for Dieldrin based on a single line of evidence consisting of fish tissue test results. Fish tissue samples were collected from a single location in the CVSC near Mecca. Dieldrin was not detected above a water quality objective in water or sediment samples collected from the CVSC.

The proposed listing is based on the results of tests performed on 6 fish tissue samples when compared to fish consumption guidelines for Dieldrin. Results for tests performed on an additional 6 fish tissue samples were not used because Dieldrin was not detected in these tissue samples. The 6 samples used for this evaluation were collected over a 15 year period beginning in 1986 and ending in 2000. The results of tests performed over many years are being combined to support this proposed listing. However, no fish tissue samples have been collected during the past 10 years to evaluate the existing conditions in this water segment. The weight of evidence fails to provide existing water impairments for Dieldrin in this water segment. This water

segment was not listed for Dieldrin following reviews performed in 2002, 2004 and 2006 and no new data is available to make a different determination following the 2008 review.

Since the weight of evidence provided in the proposed listing does not represent existing conditions, CVWD requests that the SWRCB reject the recommendation for listing the CVSC as impaired for Dieldrin without presenting new evidence representative of existing conditions in the CVSC.

3. Proposed impaired water listing for the CVSC for PCBs. The SWRCB is scheduled to consider listing the CVSC as impaired for PCBs based on a single line of evidence consisting of fish tissue test results. Fish tissue samples were collected from a single location in the CVSC near Mecca. PCBs were not detected above a water quality objective in water or sediment samples collected from the CVSC.

The proposed listing is based on the results of tests performed on 4 fish tissue samples when compared to fish consumption guidelines for PCBs. Results for tests performed on an additional 8 fish tissue samples were not used because PCBs were not detected in these tissue samples. The 4 samples used for this evaluation were collected over a 15 year period beginning in 1986 and ending in 2000. The results of tests performed over many years are being combined to support this proposed listing. However, no fish tissue samples have been collected during the past 10 years to evaluate the existing conditions in this water segment. The weight of evidence fails to provide existing water impairments for PCBs in this water segment. This water segment was not listed for PCBs following reviews performed in 2002, 2004 and 2006 and no new data is available to make a different determination following the 2008 review.

Since the weight of evidence provided in the proposed listing does not represent existing conditions, CVWD requests that the SWRCB reject the recommendation for listing the CVSC as impaired for PCBs without presenting new evidence representative of existing conditions in the CVSC.

4. Proposed impaired water listing for the Salton Sea for Arsenic. The SWRCB is scheduled to consider listing the Salton Sea as impaired for Arsenic based on a single line of evidence consisting of test results from fish tissue samples collected from three locations in the Salton Sea. Arsenic was not detected above a guideline or objective in water or sediment samples collected from the Salton Sea.

The proposed listing is based on the results of tests performed on 9 fish tissue samples when compared to fish consumption guidelines for Arsenic. The 9 samples used for this evaluation were collected over a 16 year period beginning in 1985 and ending in 2000. The results of tests performed over many years are being combined to support this proposed listing. However, no fish tissue samples have been collected during the past 10 years to evaluate the existing conditions in this water segment. The weight of evidence fails to provide existing water impairments for Arsenic in the

Salton Sea. The Salton Sea was not listed for Arsenic following reviews performed in 2002, 2004 and 2006 and no new data is available to make a different determination following the 2008 review.

The salinity of the Salton Sea is increasing and is now about 50 parts per thousand. Within the last decade, salinity tolerances of resident marine fish species were surpassed and none are expected to be present in the Salton Sea. Of the fishes previously sampled, bairdiella, orangemouth corvina, redbelly tilapia, and sargo are no longer found in the Salton Sea and data from these fishes do not reflect current conditions. Since bioaccumulation of toxins is well known to be highly dependent on salinity^{1,2}, and there has been a significant increase in salinity in the Salton Sea since the last fish tissue sample was collected, the weight of evidence fails to provide a representative assessment of existing conditions in the Salton Sea. In addition, the extant hybrid Tilapia in the Salton Sea have accelerated life histories³ with shorter life spans and shorter toxin exposure durations than most of the species sampled.

Since the weight of evidence provided in the proposed listing does not represent existing conditions, CVWD requests that the SWRCB reject the recommendation for listing the Salton Sea as impaired for Arsenic without presenting new evidence representative of existing conditions in the Salton Sea.

5. Proposed impaired water listing for the Salton Sea for Chlorpyrifos. The SWRCB is scheduled to consider listing the Salton Sea as impaired for Chlorpyrifos based on a single line of evidence consisting of test results from water samples collected from three locations in the Salton Sea. Chlorpyrifos was not detected above a guideline or objective in sediment or fish tissue samples collected from the Salton Sea.

The proposed listing for Chlorpyrifos is based on results of tests performed on 22 water samples during the period August 28, 1996 through April 15, 1997. Fifteen of these samples collected between August 28, 1996, and March 5, 1997, exceeded the California Department of Fish and Game hazardous assessment criteria of 0.02 micrograms per liter for a one-hour average for freshwater aquatic life use protection. Based on this data, Regional Board staff determined that the Warm Freshwater Habitat designation for the Salton Sea is impaired for Chlorpyrifos.

It is inappropriate to apply a freshwater aquatic life criterion to the Salton Sea. From the time the current Salton Sea was formed, natural salts in the Salton sink leached into Colorado River water causing saltwater conditions with salinity levels exceeding the brine standard of 3 parts per thousand in approximately 1903 and exceeding the

¹ Sadiq, Muhammad. 1992. Toxic Metal Chemistry in Marine Environments, CRC Press, 390 pages.

² Iliopoulou-Georgudaki, J., Sorra, V., Stroglyoudi, E., Catsiki, V. A. & Dimitriou, E. 2001. An evidence of salinity impact on the bioaccumulation of heavy metals in fishes collected from the Messolonghi lagoon in Greece. Toxicological & Environmental Chemistry, 81(3):123-131.

³ Riedel, R., Caskey, L. & Costa-Pierce, B.A. 2002. Fish biology and fisheries ecology of the Salton Sea, California. Hydrobiologia, 473(1-3):229-224.

salinity of common seawater in 1917. In addition, there is no "Warm Freshwater Habitat" beneficial use in the Salton Sea.

Since the Salton Sea is not freshwater and freshwater aquatic life criteria does not apply to the Salton Sea, CVWD requests that the SWRCB reject the recommendation for listing the Salton Sea as impaired for Chlorpyrifos without presenting new evidence indicating objectives for an existing and applicable beneficial use in the Salton Sea is exceeded.

6. Proposed impaired water listing for the Salton Sea for DDT. The SWRCB is scheduled to consider listing the Salton Sea as impaired for DDT based on a single line of evidence consisting of test results from fish tissue samples collected from three locations in the Salton Sea. DDT was not detected above a guideline or objective in water or sediment samples collected from the Salton Sea.

The proposed listing is based on the results of tests performed on 31 fish tissue samples when compared to fish consumption guidelines for DDT. The 31 samples used for this evaluation were collected over a 20 year period beginning in 1980 and ending in 2000. The results of tests performed over many years are being combined to support this proposed listing. However, no fish tissue samples have been collected during the past 10 years to evaluate the existing conditions in this water segment. The weight of evidence fails to provide existing water impairments for DDT in the Salton Sea.

The salinity of the Salton Sea is increasing and is now about 50 parts per thousand. Within the last decade, salinity tolerances of resident marine fish species were surpassed and none are expected to be present in the Salton Sea. Of the fishes previously sampled, bairdiella, orangemouth corvina, redbelly tilapia, and sargo are no longer found in the Salton Sea and data from these fishes do not reflect current conditions. Since bioaccumulation of toxins is well known to be highly dependent on salinity^{1,2}, and there has been a significant increase in salinity in the Salton Sea since the last fish tissue sample was collected, the weight of evidence fails to provide a representative assessment of existing conditions in the Salton Sea. In addition, the extant hybrid Tilapia in the Salton Sea have accelerated life histories³ with shorter life spans and shorter toxin exposure durations than most of the species sampled.

Since the weight of evidence provided in the proposed listing does not represent existing conditions, CVWD requests that the SWRCB reject the recommendation for listing the Salton Sea as impaired for DDT without presenting new evidence representative of existing conditions in the Salton Sea.