



California Regional Water Quality Control Board Central Coast Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

May 27, 2010

Jeanine Townsend, Clerk to the Board
commentletters@waterboards.ca.gov
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Ms Townsend:

SUBJECT: 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

Thank you for the opportunity to comment on the California's draft 2010 Integrated Report. Central Coast Water Board staff commends State Board staff for their considerable effort to assemble and evaluate the nine Regional Board assessments. We have carefully reviewed the draft listing decisions and supporting documentation. This letter summarizes our strong support for the following specific changes to the Integrated Report approved by the Central Coast Water Board.

1. Oso Flaco Lake pH

Staff supports the removal of Oso Flaco Lake from the 303(d) List of Impaired Waters for pH as the recommendation to add it to the List was in error. Central Coast Regional Board staff proposed this listing based on a data assessment that was not consistent with the Listing Policy, specifically section 6.1.5.3, which states that "samples collected on a single day...shall not be used as the primary data set supporting the listing decision." The data used to propose the pH listing were collected on a single date, from three locations and three depths at each location.

2. San Vicente Creek Sedimentation

Staff supports the removal of San Vicente Creek from the 303(d) List of Impaired Waters for sedimentation. The Santa Cruz Water and Wastewater Division monitor turbidity daily in San Vicente Creek. The 2006 decision to add this waterbody to the List was based on daily turbidity data for the only three months: December 2001, January 2002 and December 2002. Daily data for all other months included in that time period were not provided for staff review in the 2006 assessment. Additional supporting information in the form of cobble embedment estimates were also provided at that time. However, these data are not compared to a documented evaluation guideline and therefore do not

meet the requirements of the Listing Policy. The current decision to remove the sedimentation listing is based on evaluation of daily turbidity data from San Vicente Creek (47 months between January 2003 and February 2007). Staff concluded that the frequency of exceedance of the Basin Plan objective for turbidity in drinking water is low enough to warrant removal of this creek from the 303(d) List of Impaired Waters for sedimentation.

Most importantly, staff purport that this waterbody was initially listed using a limited dataset that was not representative of the ambient conditions in the creek. Upon review of all available data, staff support removal of this waterbody from the 303(d) List of Impaired Waters; staff's recommendation is consistent with the guidelines described in the Listing Policy.

3. Use Support Ratings

Staff supports the correction of use support ratings to be consistent with the procedure followed by Central Coast Water Board staff in making those determinations.

Therefore, staff strongly supports the three above mentioned changes to the Integrated Report.

Finally, staff urges the Board to approve the 2010 Integrated Report without further delay and to direct staff to begin assessment of more recent data for the 2012 Integrated Report.

Sincerely,



Roger Briggs
Executive Officer