State of California - Natural Resources Agency
DEPARTMENT OF FISH AND GAME
Water Branch
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June 15, 2012

Charles R. Hoppin, Chair
Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street 24th Floor
P.O. Box 100
Sacramento, CA 95814

Subject: Comments to A-2144(a)(b)-July 18 Board Workshop

Dear Mr. Hoppin:

The Department of Fish and Game (Department) appreciates the opportunity to review the Proposed Order for the Petitions on the Waste Discharge Requirements for Sacramento Regional Wastewater Treatment Plant. The Department offers the following comments for the portions of the Order that relate to the long term sustainability of California's fish and wildlife resources and for their use and enjoyment by the public.

Ammonia

The Department agrees with the Water Board findings that the allowance of mixing zones and dilution credits are not appropriate given that there is ample evidence showing that existing levels of ammonia have adverse effects far downstream, and agrees that the denial of a mixing zone is appropriate when used to compensate for uncertainties of protecting beneficial uses of the receiving water.

The Proposed Order notes that ammonia toxicity to copepods affects the biological integrity of the receiving water and the final effluent limitation for ammonia should be based on the recalculated chronic criteria based on pH of 8.0 and temperature of 22.5°C for protection of biologically sensitive species and critical habitats. The Department supports the Water Board's decision to set effluent limits that prohibit discharges that are toxic to the most sensitive species.

Additionally, the Department supports the Water Board's commitment to continue further development the Draft 2009 Ammonia Criteria and the use of the latest scientific data in order to protect freshwater species and to restore the biological integrity of the Sacramento River and Sacramento-San Joaquin Delta (Delta).

Nitrates (Nutrients)

The Department appreciates the Water Board's recognition of the biostimulatory effects that nitrates and other nutrient pollutants have on aquatic ecology in the receiving water body. The Sacramento River feeds into the fragile ecosystem of the Delta and any substantial nutrient loading placed on this already stressed system presents an ecological concern for all that depend on a healthy Delta ecosystem. Although there are currently no numerical water quality objectives for the biostimulatory effects of nutrient pollutants in the Sacramento River and Delta, the Water Boards should take into account any data or information from new and existing studies to determine whether narrative water quality objectives for biostimulatory substances are being met.

The Department appreciates the opportunity to comment on and provide support for the State Water Board's Proposed Order and upholding all other aspects of the Sacramento Regional County Sanitation District discharge permit conditions. The Proposed Order is consistent with the protection of water quality to protect the beneficial uses of the Sacramento River and Delta and, and thus protect fish and wildlife resources.

Sincerely,

Scott Cantrell
Chief, Water Branch

ec: Jeff Drongesen, DFG
Glenda Marsh, DFG
Jeffrey Shu, DFG
Kent Smith, DFG
Jim Starr, DFG
Scott Wilson, DFG