

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LAHONTAN REGION**

**MEETING OF MARCH 10-11, 2021  
VIDEO AND TELECONFERENCE ONLY**

**LATE - ITEM #7**

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE, HOT CREEK FISH  
HATCHERY, MONO COUNTY**

- A. RENEWAL OF NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
(NPDES) PERMIT**
- B. TIME SCHEDULE ORDER**

\*\*Please insert the attached Mammoth Community Water District Comments  
letter, after Bates Number 7 - 212

<b>ENCLOSURE</b>	<b>ITEM</b>	<b>BATES NUMBER</b>
<b>7</b>	Mammoth Community Water District comments – January 25, 2021	<b>7 - 212.1</b>



# **ENCLOSURE 7**





January 25, 2021

California Regional Water Quality Control Board – Lahontan Region  
2501 Lake Tahoe Blvd  
South Lake Tahoe, CA 96150

Subject: Comments on Tentative Waste Discharge Requirements and Time Schedule Order (NPDES Permit No. CA0102776) for California Department of Fish and Wildlife Hot Creek Fish Hatchery Mono County dated December 21, 2020 (Tentative WDRs for Hot Creek Hatchery)

The Mammoth Community Water District has reviewed the proposed Tentative WDRs for Hot Creek Hatchery and have the following comments:

1. Tentative Time Schedule Order No. R6V-2021-XXXX statement number 10 requires the Discharger to evaluate whether the discharge of waste at Laurel Pond is impacting the Hatchery's influent springs. This seems inappropriate. However, we agree that the Discharger should certainly be required to study potential adverse impacts from the onsite wastewater disposal ponds as required by statement 9. The discharge from Laurel Pond is regulated by another WDR and is already being studied by Mammoth Community Water District (MCWD).
2. The Tentative WDRs for Hot Creek Hatchery identify the MCWD discharge to Laurel Pond and the onsite wastewater disposal ponds as potential sources of adverse impacts to the four Hatchery influent springs. However, there are several other sources of water discharged between Laurel Ponds and the Hot Creek Fish Hatchery that may also be contributors (e.g. Mammoth Yosemite Airport, Sierra Business Park, cattle grazing).
3. Tentative Time Schedule Order No. R6V-2021-XXXX statement number 10 cites Laurel Pond groundwater nitrate-nitrogen concentration data from 2017-2019. However, MCWD has collected data from four groundwater monitoring wells around Laurel Pond from 1991-2019. This data shows that up-gradient groundwater contains nitrate-nitrogen concentrations less than 0.2 mg/L and that groundwater down-gradient of the Laurel Pond contain averages of 1.98 mg/L ammonia, 1.2 mg/L nitrate-nitrogen, and 3.94mg/L total Kjeldahl nitrogen. The four Laurel Pond monitoring wells may be compromised due to their shallow depths and age and are possibly no longer providing accurate data. As a result, drilling of 4 new monitoring wells is scheduled for summer of 2021. Groundwater down-gradient contaminant levels obtained from 2017-2019 are higher than the average and MCWD believes that selecting a three year period is misrepresentative of the data. MCWD would like to see the data represented in the Tentative Time Schedule Order updated to provide a more accurate depiction of Laurel Pond's monitoring history.

Thank you for considering our comments. If you have any questions, please feel free to contact me. We look forward to continuing to work with California Regional Water Quality Control Board and other agencies in our community.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Busby', with a stylized flourish at the end.

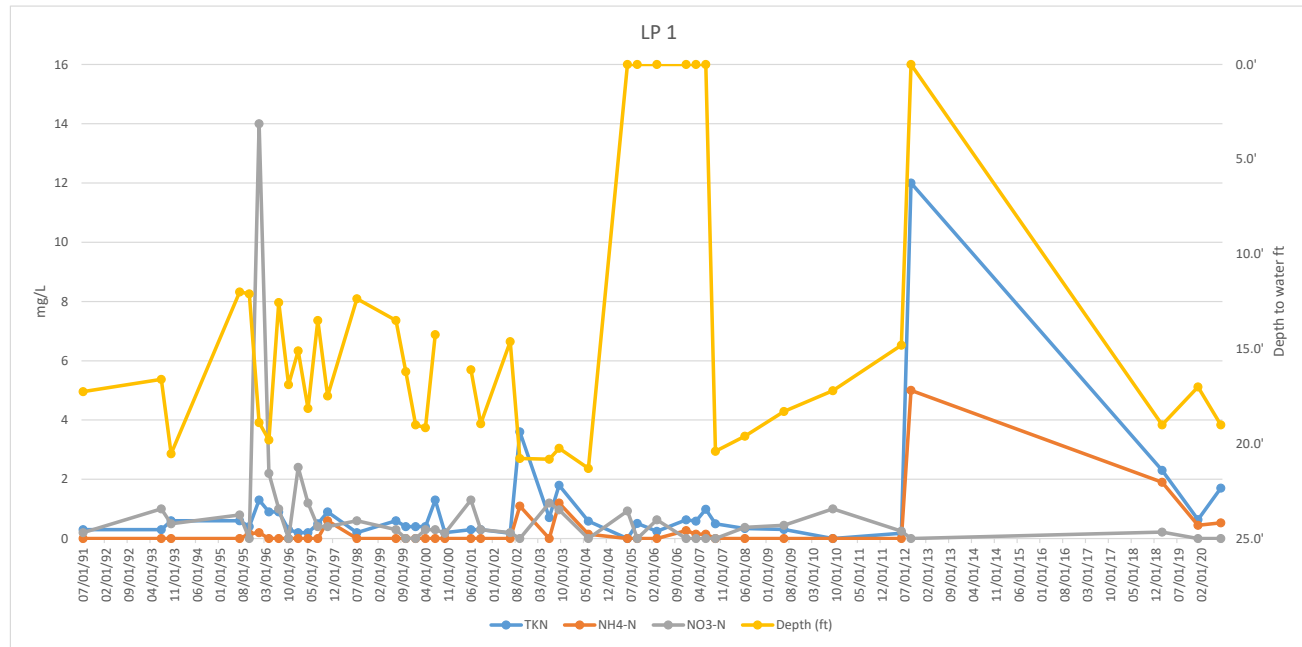
Mark Busby  
General Manager

Attachment (Laurel Pond Nitrogen Data 1991-2020)

**MAMMOTH COMMUNITY WATER DISTRICT**  
**Laurel Pond Well 1**  
**Monitoring Reporting Program 91-22**  
**WDID No. 6B260103001**

Date	TKN	NH4-N	NO3-N	Depth (ft)
07/09/91	0.3	0	0.2	17.3'
07/06/93	0.3	0	1	16.6'
10/04/93	0.6	0	0.5	20.5'
07/10/95	0.6	0	0.8	12.0'
10/03/95	0.4	0.16	0	12.1'
01/08/96	1.3	0.2	14	18.9'
04/01/96	0.9	0	2.2	19.8'
07/15/96	0.9	0	1	12.6'
10/14/96	0.3	0	0	16.9'
01/15/97	0.2	0	2.4	15.1'
04/07/97	0.2	0	1.2	18.1'
07/01/97	0.5	0	0.4	13.5'
10/16/97	0.9	0.6	0.4	17.5'
07/06/98	0.2	0	0.6	12.4'
07/06/99	0.6	0	0.3	13.5'
10/06/99	0.4	0	0	16.2'
01/11/00	0.4	0	0	19.0'
04/10/00	0.4	0	0.3	19.2'
07/19/00	1.3	0	0.3	14.3'
10/03/00	0.2	0	0.18	
06/06/01	0.3	0	1.3	16.1'
09/04/01	0.3	0	0.3	19.0'
06/05/02	0.18	0	0.2	14.6'
09/04/02	3.6	1.1	0	20.8'
06/02/03	0.71	0	1.2	20.8'
09/09/03	1.8	1.2	0.97	20.2'
06/09/04	0.59	0.15	0	21.3'
06/08/05	0	0	0.93	10.7'
09/07/05	0.51	0	0	14.1'
03/08/06	0.24	0	0.63	17.0'
12/04/06	0.63	0.27	0	17.5'
03/05/07	0.59	0.15	0	20.2'
06/01/07	0.99	0.15	0	20.2'
09/07/07	0.5	0	0	20.4'
06/04/08	0.34	0	0.38	19.6'
06/04/09	0.31	0	0.45	18.3'
09/02/10	0	0	1	17.2'
06/06/12	0.18	0	0.25	14.8'
09/05/12	12	5	0	19.7'
02/26/19	2.3	1.9	0.22	19.0'
01/15/20	0.64	0.45	0	17.0'
08/19/20	1.7	0.53	0	19.0'
<b>Average</b>	<b>0.94</b>	<b>0.28</b>	<b>0.80</b>	<b>17.2'</b>
<b>Max</b>	<b>12.00</b>	<b>5.00</b>	<b>14.00</b>	<b>21.30</b>
<b>Min</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>12.00</b>

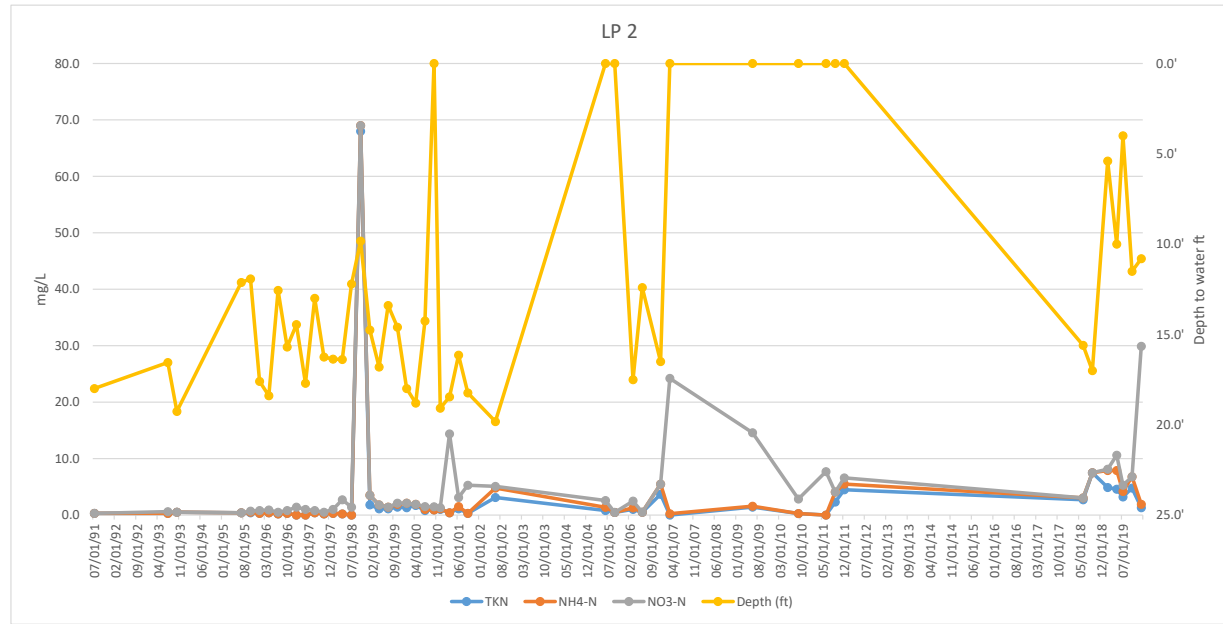
LP 1	TKN (mg/L)	NH4-N (mg/L)	NO3-N (mg/L)	Depth (ft)
Average	0.9	0.3	0.8	17.2
Max	12.0	5.0	14.0	21.3
Min	0.0	0.0	0.0	12.0



**MAMMOTH COMMUNITY WATER DISTRICT**  
**Laurel Pond Well 2**  
**Monitoring Reporting Program 91-22**  
**WDID No. 6B260103001**

Date	TKN	NH4-N	NO3-N	Depth (ft)
07/09/91	0.3	0.0	0.0	18.0'
07/06/93	0.3	0.0	0.3	16.6'
10/04/93	0.5	0.0	0.0	19.3'
07/10/95	0.4	0.0	0.0	12.1'
10/03/95	0.4	0.1	0.2	11.9'
01/08/96	0.3	0.0	0.5	17.6'
04/01/96	0.4	0.0	0.5	18.4'
07/15/96	0.2	0.0	0.3	12.6'
10/14/96	0.3	0.0	0.5	15.7'
01/15/97	0.0	0.0	1.4	14.5'
04/07/97	0.0	0.0	1.0	17.7'
07/01/97	0.4	0.0	0.4	13.0'
10/16/97	0.2	0.0	0.3	16.3'
01/19/98	0.3	0.0	0.7	16.4'
04/07/98	0.2	0.0	2.5	16.4'
07/06/98	0.0	0.0	1.4	12.2'
10/12/98	68.0	1.0	0.0	9.8'
01/11/99	1.8	1.7	0.0	14.8'
04/01/99	1.1	0.7	0.0	16.8'
07/06/99	1.1	0.3	0.0	13.4'
10/06/99	1.4	0.5	0.2	14.6'
01/11/00	1.3	0.8	0.0	18.0'
04/10/00	1.7	0.2	0.0	18.8'
07/19/00	0.8	0.2	0.5	14.3'
10/03/00	0.9	0.0	0.6	
12/13/00	1.0	0.1	0.2	19.1'
03/06/01	0.4	0.0	14.0	18.5'
06/06/01	1.1	0.4	1.6	16.2'
09/04/01	0.3	0.0	5.0	18.2'
06/05/02	3.1	1.7	0.3	19.8'
06/08/05	0.8	0.6	1.2	17.1'
09/07/05	0.5	0.0	0.0	13.8'
03/08/06	1.0	0.3	1.2	17.5'
06/06/06	0.5	0.0	0.0	12.4'
12/04/06	3.7	1.8	0.0	16.5'
03/05/07	0.0	0.2	24.0	16.7'
06/04/09	1.4	0.2	13.0	18.5'
09/02/10	0.3	0.0	2.6	16.3'
06/08/11	0.0	0.0	7.7	17.3'
09/08/11	2.3	1.8	0.0	7.20'
12/07/11	4.5	1.0	1.1	17.9'
06/07/18	2.7	0.4	0.0	15.6'
09/05/18	7.5			17.0'
02/26/19	4.9	3.0	0.2	5.4'
05/15/19	4.6	3.3	2.7	10.0'
07/17/19	3.2	1.0	1.1	4.0'
10/09/19	4.8	2.0	0.0	11.5'
01/15/20	1.3	0.6	28.0	10.8'
<b>Average</b>	<b>2.75</b>	<b>0.51</b>	<b>2.45</b>	<b>14.9'</b>
<b>Max</b>	<b>68.00</b>	<b>3.30</b>	<b>28.00</b>	<b>19.82'</b>
<b>Min</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>4.00'</b>

LP 2	TKN (mg/L)	NH4-N (mg/L)	NO3-N (mg/L)	Depth (ft)
<b>Average</b>	2.8	0.5	2.5	14.9
<b>Max</b>	68.0	3.3	28.0	19.8
<b>Min</b>	0.0	0.0	0.0	4.0

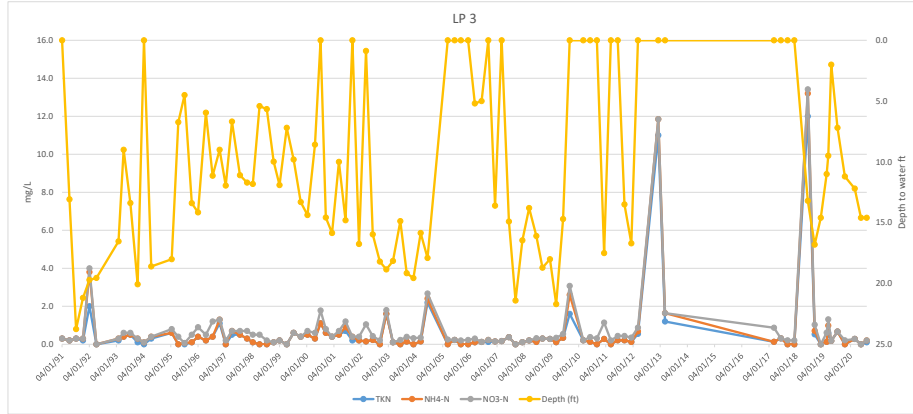




MAMMOTH COMMUNITY WATER DISTRICT  
 Laurel Pond Well 3  
 Monitoring Reporting Program 91-22  
 WDID No. 6B260103001

Date	TKN	NH4-N	NO3-N	Depth (ft)
04/01/91	0.3		0.0	
07/09/91	0.2	0.0	0.0	13.1
10/07/91	0.3	0.0	0.0	23.8
01/07/92	0.2	0.1	0.0	21.2
04/03/92	2.0	1.8	0.2	19.7
07/06/92	0.0	0.0	0.0	19.5
04/28/93	0.2	0.1	0.0	16.5
07/06/93	0.4	0.0	0.2	9.0
10/04/93	0.5	0.0	0.1	13.4
01/10/94	0.1	0.2	0.0	20.1
04/06/94	0.0	0.1	0.0	
07/12/94	0.3	0.1	0.0	18.6
04/13/95	0.6	0.0	0.2	18.0
07/10/95	0.0	0.0	0.4	6.7
10/03/95	0.0	0.1	0.0	4.5
01/08/96	0.1	0.0	0.4	13.4
04/01/96	0.4	0.0	0.5	14.2
07/15/96	0.2	0.0	0.3	6.0
10/14/96	0.4	0.0	0.8	11.1
01/15/97	1.1	0.2	0.0	9.0
04/07/97	0.0	0.0	0.2	12.0
07/01/97	0.5	0.2	0.0	6.7
10/16/97	0.5	0.0	0.2	11.1
01/19/98	0.3	0.0	0.4	11.7
04/07/98	0.1	0.0	0.4	11.8
07/06/98	0.0	0.0	0.5	5.4
10/12/98	0.0	0.0	0.2	5.7
01/11/99	0.1	0.0	0.0	10.0
04/01/99	0.2	0.0	0.0	11.9
07/06/99	0.0	0.0	0.0	7.2
10/06/99	0.6	0.0	0.0	9.8
01/11/00	0.4	0.0	0.0	13.3
04/10/00	0.5	0.0	0.2	14.4
07/19/00	0.3	0.0	0.3	8.6
10/03/00	1.1	0.0	0.7	
12/13/00	0.6	0.0	0.2	14.6
03/06/01	0.4	0.0	0.0	15.9
06/06/01	0.5	0.0	0.2	10.0
09/04/01	0.7	0.2	0.3	14.8
12/04/01	0.2	0.2	0.0	
03/04/02	0.2	0.0	0.2	16.8
06/05/02	0.2	0.0	0.9	0.9
09/04/02	0.2	0.0	0.2	16.0
12/09/02	0.0	0.0	0.2	18.2
03/05/03	1.6	0.0	0.2	18.9
06/02/03	0.1	0.0	0.0	18.2
09/09/03	0.0	0.0	0.2	14.9
12/04/03	0.1	0.0	0.3	19.2
03/03/04	0.0	0.0	0.3	19.6
06/09/04	0.2	0.0	0.2	15.9
09/08/04	2.2	0.2	0.3	17.9
06/08/05	0.0	0.0	0.3	10.2'
09/07/05	0.2	0.0	0.0	8.6'
11/30/05	0.0	0.0	0.2	16.5'
03/08/06	0.0	0.0	0.2	16.0'
06/06/06	0.1	0.0	0.2	5.2
09/05/06	0.1	0.0	0.0	5.0
12/04/06	0.1	0.1	0.0	11.7'
03/05/07	0.2	0.0	0.0	13.6'
06/01/07	0.2	0.0	0.0	13.9'
09/07/07	0.4	0.0	0.0	14.9
12/05/07	0.0	0.0	0.0	21.4
03/06/08	0.1	0.0	0.0	16.5
06/04/08	0.2	0.0	0.0	13.8
09/10/08	0.1	0.0	0.2	16.1
12/01/08	0.3	0.0	0.0	18.7
03/11/09	0.3	0.0	0.0	18.0
06/04/09	0.1	0.0	0.2	21.7
09/03/09	0.3	0.0	0.2	14.7
12/02/09	1.6	1.0	0.5	18.0'
06/02/10	0.2	0.0	0.0	16.7'
09/02/10	0.1	0.0	0.3	11.5'
12/02/10	0.0	0.0	0.3	16.7'
03/09/11	0.3	0.0	0.9	17.5
06/08/11	0.0	0.0	0.2	11.9'
09/08/11	0.2	0.0	0.2	6.60'
12/07/11	0.2	0.0	0.2	13.5
03/09/12	0.1	0.0	0.2	16.7
06/06/12	0.6	0.1	0.2	20.2'
03/05/13	11.0	0.9	0.0	18.5'
06/05/13	1.2	0.4	0.0	17.8'
06/07/17	0.1	0.0	0.7	4.85'
09/07/17	0.3	0.0	0.0	3.95'
12/06/17	0.0	0.0	0.2	11.1'
03/07/18	0.0	0.0	0.2	16.7'
06/07/19	0.6	0.4	0.3	9.5
09/05/18	12.0	1.2	0.2	13.2
12/05/18	0.5	0.2	0.3	16.8
02/26/19	0.0	0.0	0.0	14.6
05/15/19	0.1	0.0	0.5	11.0
07/17/19	0.2	0.0	0.0	2.0
10/09/19	0.7	0.0	0.0	7.2
01/15/20	0.0	0.0	0.2	11.2
05/27/20	0.3	0.0	0.0	12.2
08/19/20	0.0	0.0	0.0	14.6
11/04/20	0.1	0.1	0.0	14.6
<b>Average</b>	<b>0.5</b>	<b>0.1</b>	<b>0.2</b>	<b>13.5</b>
<b>Max</b>	<b>12.0</b>	<b>1.8</b>	<b>0.9</b>	<b>23.8</b>
<b>Min</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.9</b>

LP 3	TKN (mg/L)	NH4-N (mg/L)	NO3-N (mg/L)	Depth (ft)
<b>Average</b>	0.5	0.1	0.2	13.5
<b>Max</b>	12.0	1.8	0.9	23.8
<b>Min</b>	0.0	0.0	0.0	0.9



MAMMOTH COMMUNITY WATER DISTRICT  
 Laurel Pond Well 4  
 Monitoring Reporting Program 91-22  
 WDID No. 6B260103001

Date	TKN	NH4-N	NO3-N	Depth (ft)
04/01/91	0.4		0.1	
07/09/91	0.1	0.0	0.0	15.3'
10/07/91	0.3	0.0	0.0	25.4'
01/07/92	0.2	0.1	0.0	20.8'
04/03/92	2.6	0.1	5.2	19.1'
07/06/92	0.0	0.0	1.5	19.2'
10/08/92	9.9	1.1	0.0	25.3'
04/28/93	0.2	0.1	0.0	16.4'
05/24/93	0.3			13.1'
07/06/93	0.5	0.0	1.8	9.7'
10/04/93	0.3	0.0	0.3	14.9'
01/10/94	0.3	0.1	0.2	21.2'
04/06/94	0.3	0.2	0.8	
07/12/94	1.6	0.1	0.0	18.6'
10/10/94	3.3	0.7	0.0	21.0'
01/16/95	0.2	0.9	0.7	21.0'
04/13/95	2.3	0.0	1.3	17.6'
07/10/95	0.0	0.7	0.0	7.6'
10/03/95	7.7	0.0	0.0	5.0'
01/08/96	0.4	5.3	0.9	14.0'
04/01/96	0.3			14.5'
07/15/96	8.9	0.0	0.3	6.2'
10/14/96	0.2	5.0	0.0	11.5'
01/15/97	0.5	0.1	0.3	9.6'
04/07/97	1.6	0.0	1.0	11.9'
07/01/97	0.6	0.3	0.0	7.3'
10/16/97		0.0	0.0	11.7'
01/19/98	0.7	0.2	0.3	13.8'
04/07/98	1.1	0.7	0.6	12.1'
07/06/98	9.5	6.0	0.0	6.1'
10/12/98	0.0	0.0	0.3	9.5'
01/11/99	0.8	0.4	0.0	10.4'
04/01/99	0.4	0.0	0.3	22.4'
07/06/99	1.2	0.5	0.0	8.0'
10/06/99	0.9	0.3	0.0	10.5'
01/11/00	0.5	0.2	0.0	14.0'
04/10/00	0.0	0.0	0.2	14.5'
07/19/00	0.2	0.0	0.0	7.8'
10/03/00	11.0	7.2	0.0	
06/06/01	0.3	0.0	0.2	10.4'
09/04/01	1.6	0.4	0.0	14.0'
03/04/02	1.7	0.8	0.3	
06/05/02	0.3	0.0	0.2	14.6'
09/04/02	0.8	0.0	0.3	16.9'
12/09/02	0.2	0.0	1.1	17.9'
03/05/03	1.6	0.4	1.8	18.4'
06/02/03	0.1	0.0	0.3	15.0'
12/04/03	22.0	8.3	0.0	18.7'
06/09/04	2.1	1.5	0.3	15.8'
06/08/05	12.0	5.7	0.0	10.0'
09/07/05	120.0	77.0	0.0	10.1'
11/30/05	20.0	16.0	0.0	16.0'
03/08/06	8.9	8.2	0.0	16.3'
06/06/06	6.7	3.7	0.0	6.0'
09/05/06	9.0	7.3	0.0	5.8'
03/05/07	7.6	4.6	0.0	13.8'
06/01/07	2.8	1.7	0.0	10.2'
09/07/07	44.0	30.0	0.0	14.7'
03/06/08	22.0	9.9	0.0	16.3'
06/04/08	3.2	2.4	0.0	14.0'
06/08/11	1.1	0.7	0.0	12.1'
09/08/11	0.8	0.2	0.0	12.6'
06/05/13	38.0	30.0	0.0	16.6'
06/07/17	3.7	2.2	0.0	5.10'
09/07/17	0.6	0.3	0.0	4.50'
12/06/17	47.0	31.0	0.0	11.5'
06/07/18	4.9	3.3	0.4	9.7'
09/05/18	65.0	50.0	0.2	11.8'
07/17/19	45.0	16.0	0.0	3.0'
09/18/19	2.3	2.8	0.0	6.2'
10/09/19	5.8	4.6	0.0	7.7'
01/15/20	6.6	6.0	0.0	12.4'
05/27/20	5.0	4.8	0.0	12.2'
08/19/20	3.3	2.4	0.3	14.6'
<b>Average</b>	<b>8.0</b>	<b>5.1</b>	<b>0.3</b>	<b>13.7</b>
<b>Max</b>	<b>120.0</b>	<b>77.0</b>	<b>5.2</b>	<b>25.4</b>
<b>Min</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>3.0</b>

LP 4	TKN (mg/L)	NH4-N (mg/L)	NO3-N (mg/L)	Depth (ft)
Average	8.0	5.1	0.3	13.7
Max	120.0	77.0	5.2	25.4
Min	0.0	0.0	0.0	3.0

