

Established in 1918 as a public agency
Coachella Valley Water District

Directors:

Peter Nelson, President - Div. 4
John P. Powell, Jr., Vice President - Div. 3
Patricia A. Larson - Div. 2
Debi Livesay - Div. 5
Franz W. De Klotz - Div. 1

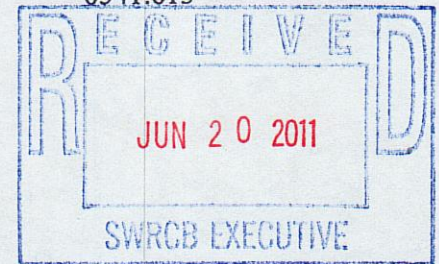
Officers:
Steven B. Robbins, General Manager-Chief Engineer
Julia Fernandez, Board Secretary

Redwine and Sherrill, Attorneys

June 20, 2011

File: 0022.117.1
0541.613

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000



Dear Ms. Townsend:

Subject: Comment Letter - CVSC BI TMDL

The Coachella Valley Water District (CVWD) appreciates the opportunity to provide comments on the proposed approval of amendments to the Water Quality Control Plan (Basin Plan) for the Colorado River Basin Region to establish a Total Maximum Daily Load (TMDL) and implementation plan for Bacterial Indicators (BI) in the Coachella Valley Stormwater Channel (CVSC). CVWD provides domestic water, wastewater, recycled water, irrigation/drainage and regional stormwater protection services to a population of about 300,000 throughout the Coachella Valley. These services include operating and maintaining the Coachella Valley Stormwater Channel (CVSC).

CVWD wishes to identify one error in the staff discussion item for the State Water Resources Control Board's consideration of the resolution approving the subject amendments. The second paragraph of the discussion on Implementation states, "If monitoring and assessment in Phase I indicate that waste discharges to the Coachella Valley Storm Water Channel from anthropogenic activities continue to cause the exceedances of the water quality objectives and that these exceedances [emphasis added] persist despite recommended operation and maintenance procedures and control measures in their existing permits, the implementation actions for attainment of the TMDL requires additional actions to control pathogenic sources in Phase II." The record for this Basin Plan amendment does not support the emphasized text that concludes existing anthropogenic activities are causing the exceedance of BI water quality objectives for the CVSC. The underlined text should be revised to read as follows:

"If monitoring and assessment in Phase I indicate that waste discharges to the Coachella Valley Storm Water Channel from anthropogenic activities violate the TMDL ~~continue to cause the exceedances of the water quality objectives~~ and that violations ~~these exceedances~~ persist despite recommended operation and maintenance procedures and control measures in their existing permits, the Regional Water Board shall require the implementation of additional actions to control anthropogenic sources of bacteria in Phase II."

CVWD's requested revision is consistent with the following statements contained in the Basin Plan (Chapter 4, Section V) amendment adopted under Colorado River Basin Water Board Resolution No. R7-2010-0028:

1. Item G(1), TMDL Elements, Table 1, Source Analysis, Paragraph 1:

“Due to the limited data available, actual contribution from urban and stormwater runoff and contributions from other point and nonpoint sources require further characterization.”

2. Item G(1), TMDL Elements, Table G-1, Source Analysis, Paragraph 3:

“The DNA monitoring and analysis study determined the percentage distribution of fecal sources in the CVSC. The following potential bacterial sources were identified in CVSC from the two hundred samples collected during the study: avian (40%), human (25%), rodents plus other wild mammals (25%), and livestock (<3%). Approximately 6% of the E. coli species originated from unknown sources. This distribution provides an idea of the possible sources of bacteria in CVSC, although it does not reflect the relative loading from those sources. Although scientific studies support the use of ribotype-based MST methods, there are concerns regarding their accuracy due to spatial and temporal vectors, stability of the markers, and sampling design.”

3. Item G(2.3), Phase II Implementation actions:

“Actions taken in Phase I (within three years after USEPA approves the TMDL) will determine whether WQOs have been achieved, sources of bacterial pollution have been identified, and whether additional actions are required in Phase II (within three years after end of Phase I) to meet WQOs. If monitoring and assessment in Phase I indicate that waste discharges to CVSC from anthropogenic activities violate this TMDL, and that violations persist despite recommended operation and maintenance procedures and control measures in their existing permits, the Regional Water Board shall require the implementation of additional actions to control anthropogenic sources of bacteria in Phase II [emphasis added]. The Regional Water Board will require responsible parties to select and implement new/additional management practices (MPs) for Phase II, following characterization of sources and a determination of whether these sources can be controlled. This determination shall take into consideration background conditions and cost factors. The Regional Water Board may revise Municipal Separate Storm Sewer System (MS4) permit water quality based effluent limitations, which may be expressed in terms of narrative management practice (MP) requirements. The Regional Water Board may also consider revising WQOs for CVSC to address natural background sources of bacteria. This revision would be accomplished through the establishment of a Site Specific Objective (SSO) after completing a Use Attainability Analysis (UAA). If an SSO is required, it would be developed by the end of Phase 2 based on available resources.”

Jeanine Townsend
State Water Resources
Control Board

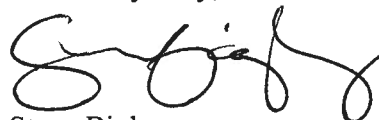
3

June 20, 2011

With this minor correction to the discussion item, CVWD supports the approval of the draft State Water Resources Control Board resolution approving amendments to the Basin Plan adopted under Colorado River Basin Water Board Resolution Nos. R7-2007-0039 and R7-2010-0028.

If you have any questions, please call me at extension 2286.

Yours very truly,



Steve Bigley
Environmental Services Manager

cc: Mr. Robert Perdue
Executive Officer
Water Quality Control Board- Colorado River Basin Region
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

SB:ch\eng\wr\11\June\Comment Letter - CVSC BI TMDL