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Attn: Ms. Townsend

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Diane Riddle
State Water Control Board



Butte
Environmental
Council



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Butte Environmental Council (BEC) would like to thank you for the opportunity to comment on the Bay-Delta Strategic Workplan. These comments were prepared under funding from the Rose Foundation that enables BEC to follow and participate in local and state programs where we are active stewards of upstream watersheds. We recognize that the Water Boards have the responsibility for protecting and maintaining the quality of all water bodies including those not currently impaired. Many of Butte County's waterways fall into this category and our comments are centered on the importance of preserving these important source waters for all beneficial uses. With that goal in mind, it is imperative that a much greater focus is placed on creating a baseline of water quality data for all of our watersheds that enables success of many of the workplan elements. We would like to see more emphasis placed on establishing a top-down approach, monitoring and maintaining the upper watersheds in an effort to improve the source waters for the Bay-Delta watershed.

Water Quality and Contaminant Control

The primary goal in identifying these, along with other complementary actions, is to ensure that the Water Boards are taking all necessary actions to address water quality impairments that may have a nexus with species declines in the Bay-Delta and water supply impacts.

There is currently very little data that establishes a baseline for surface water quality in Butte County. The ILRP does not have monitoring sites for any of our major waterways (specifically: Feather River, Butte Creek, and Big and Little Chico Creeks) and the SWAMP program does not yet operate in the upper reaches of the Sacramento River Watershed. While we do have waterways listed on the 303d list (Butte Slough and Lower Feather River), it has been a real struggle to determine the current conditions for these water bodies and what actions are being taken to improve overall water quality. In addition, there are many unique anthropogenic and natural perturbations in this area. For example, the town of Paradise has the highest density septic system in the state.

Develop and implement TMDLs for constituents that impair aquatic life, wildlife, and agriculture beneficial uses in the Delta including salt and boron, low DO, OP pesticides, pathogens, mercury, selenium, and PCBs.

Butte County watersheds appear not to be a focus at the state level regarding activities that are "in progress" elsewhere within the greater context of the Bay-Delta watershed (TMDL development, representation for Drinking Water Policy development for the Central Valley, and investigations into ambient ammonia, phosphorus, selenium, and boron concentrations). Lack of focus in the upper reaches of the Bay-Delta watershed sets us all back. Water quality indicators must be monitored for the protection of a watershed (from the U.S. Intergovernmental Task Force on Monitoring Water Quality), and provides the following:

- Database of indicators measured over a range of conditions and perturbations with appropriate time and geographic scales
- Warning of changes
- Benchmark against which to measure progress or degradation
- Comparable data sets and past conditions

Comprehensive Monitoring Program

Many agencies and groups monitor water quality, water flows, and ecological conditions in the Bay-Delta, but there is no comprehensive contaminants monitoring and assessment program.

We commend Cal/EPA and the Resources Agency for the formation of the California Water Quality Monitoring Council. However, without local representation on this council, the northern Sacramento Valley will suffer further oversight. There has been a dearth of monitoring activity in this region to date without compilation and analysis. Without monitoring, appropriate TMDL development cannot occur. Butte County has numerous discharger assessments that should fund local monitoring programs. It behooves the state to support local programs that have vested interests in maintaining the health of their watersheds. It is a win-win situation for local residents as well as for downstream destinations such as the Bay-Delta.

In a letter to the State Water Resources Control Board, dated June 14, 2004, BEC pointed out the significant water quality issues affecting our major water ways:

- Butte Creek – diazinon level at one site is 42,000 ng/l as reported in a 2002 Sacramento River Watershed Program report. "All of Butte Creek should be monitored considering it is a major drainage for agriculture in Butte County."
- Little Chico Creek – 12 ng/l reported in 2003
- Mud Creek – mercury toxicity concerns as reported in 2003
- Dry Creek – significant mercury toxicity as reported in 2003

- Feather River – listed in 2006 for diazinon, chlorpyrifos, group A pesticides, mercury, temperature and unknown toxicity

A 2006 Fact Sheet (CVRWQCG) supporting revision of the 303d list indicates the Sacramento River between Red Bluff and Knights Landing reported exceedances for diazinon in 33 of 144 samples. All samples were collected in 2002 and 2006 (TSMP, 2002; CVRWQCB, 2006). The reach most impacted extends from Hamilton City – just above the confluence of Big Chico Creek, Butte County's northern most tributary – to Knights Landing. We feel this issue is indicative of the requirement for monitoring the upper reaches of the above listed watersheds.

A comprehensive chemical analysis of water samples is necessary to improve knowledge of chemical interactions within the complex mixture of organic and inorganic species found in effluent streams. Comprehensive chemical analysis is necessary as well as a means to estimate aqueous speciation modeling. Current studies on acid mine drainage, natural chemical concerns and wastewater tracking indicate the importance of a complete chemical analysis (including major ions) of source waters.

Butte County has experienced recent fire devastation over the last month, some of which are still burning. To date, over 75,000 acres have burned and more than 200 structures have been destroyed. The possible effects to water quality from slicking-off and silting will not be felt until November when the first-flush rains hit. By comparison, the Angora fire in the Tahoe area last year burned 3100 acres.

Water Right Compliance, Enforcement, and Other Activities to Ensure Adequate Flows to Meet Water Quality Objectives

Approximately 86% of Butte County citizens are dependent on groundwater. Our population is expected to grow significantly over the next 15 years, straining our water supplies and increasing wastewater and urban runoff discharge loads and concentrations of organic carbon, nutrients, salt, and pathogens. Protection of groundwater systems is significant due to the interconnections between surface and groundwater in order that surface water supplies remain viable, healthy, and of high quality. DWR has indicated that declining groundwater levels in the north Bay-Delta watershed have caused a migration upstream or lengthening of 'loosing' reaches – segments of a stream that loose water to the groundwater system – of the Sacramento River.

Other Activities

Work with the Department of Fish and Game (DFG) to establish and ensure the implementation of in-stream flow requirements for priority California streams, including a Delta tributary, to protect public trust resources.

In-stream flows are a complex interaction of precipitation, run-off, groundwater levels, and beneficial use; not simply the localized impact of water diversions. Protection begins with proper emphasis on regulation of urban/rural development within the critical zones of the upper watersheds for the protection of public trust resources. The workplan elements stress flow volumes, where many other factors play a significant role in the health of streams.

Butte Creek is the last remaining hope for the endangered Central Valley spring-run salmon migration this year. In the midst of a collapse of the salmon populations, how will the effects of fire perturbations impact spring spawning and fall migration? For two years in a row, large quantities of spring-run salmon have seen holding off in lower pools along Butte Creek. Lack of flow was not an issue for these fish and temperature did not play a role either; however, increased water temperatures would have killed these fish if they hadn't been moved.

Additionally, we support expanding the CV-SALTS program into all reaches of the Sacramento River watershed.

In conclusion, the following requirements for water quality protection from State Water Quality Control policy, summarize nicely our position. We are calling for greater focus on the upper reaches of the Bay-Delta watershed (in this case, Butte County's watersheds) in protecting and maintaining the water quality and beneficial use for all, including the downstream reaches of the Bay-Delta. These requirements address the antidegradation component of water quality standards by identifying trends:

- Data must be collected for at least three years
- Data must establish specific baseline conditions
- Specify the influence of seasonal effects, interannual effects

Sincerely,

Carol Perkins
Water Quality Advocate - Butte Environmental Council