



SAN FRANCISCO PUBLIC UTILITIES COMMISSION

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May 6, 2009

Naomi Feger, Senior Environmental Scientist
California Regional Water Quality Control Board
San Francisco Bay Region
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GENERAL MANAGER

Subject: Proposed Adoption of Basin Plan Triennial Review

Dear Ms. Feger:

The City and County of San Francisco Public Utilities Commission (SFPUC) Wastewater Enterprise (WWE) appreciates the opportunity to provide comments on the proposed adoption of the 2009 Basin Plan Triennial Review by the San Francisco Bay Regional Water Board. The SFPUC submitted comments on May 30, 2008, prior to the workshop, supporting the evaluation of the shellfish beneficial use for the Francisco Bay and adoption of federal BEACH Act recreational contact standards developed by U.S. EPA (comment letter Attachment 2). We are pleased that these topics are included in the review plan: assessment of the BEACH Act criteria is listed as issue No. 3 and evaluation of the shellfish beneficial use is issue No. 6.

In addition, we believe three more issues should be included on this Triennial Review list with a high priority:

- *'Reasonable potential' analysis (RPA) procedure*

The RPA procedure is used to determine which pollutants require effluent limitations in permits. The procedure defined in the California Ocean Plan provides a more accurate determination of the likelihood that water quality objectives will be exceeded, and should be incorporated into the San Francisco Basin Plan.

- *Use of the State Implementation Policy mixing zone approach in identifying a dilution factor and setting effluent limitations*

The San Francisco Basin Plan Triennial Review should consider acceding to the State Implementation Policy (SIP) and removing the current 10:1 cap placed on dilution factors for most pollutants.

- *Wet weather standards*

The review plan should include an assessment of whether beneficial use designations should reflect wet weather and dry weather period variability, particularly during storm flow conditions.

We have included a more detailed discussion of these issues in the attachment. Thank you for the opportunity to comment on the San Francisco Basin Plan Triennial Review. Please contact Arleen Navarret, WWE Regulatory Manager of my staff by email at anavarret@sflower.org if you have any questions or would like additional information.

Sincerely,



Tommy T. Moala
Assistant General Manager
Wastewater Enterprise

Attachments

1. SFPUC Detailed San Francisco Basin Plan Triennial Review Comments May 2009
2. SFPUC San Francisco Basin Plan Triennial Review Support Letter May 30, 2008

Attachment 1 – SFPUC Detailed San Francisco Basin Plan Triennial Review Comments

Issues Suggested for the Triennial Review of the San Francisco Bay Basin Plan

1. Reasonable Potential

The Clean Water Act regulations require effluent limitations for pollutants that demonstrate ‘reasonable potential’ to cause or contribute to an excursion above any water quality standard. For inland waters, the ‘reasonable potential analysis’ procedure is outlined in the State Implementation Policy (SIP)¹ and specifies that any measured pollutant concentration in the effluent that numerically exceeds the lowest criterion is adequate basis for a determination of reasonable potential. This approach does not take into effect any dilution or data analysis. Alternatively, the mere presence (any concentration) in the effluent of any pollutant that has been identified in the receiving water as exceeding a criterion is also adequate basis for determination of reasonable potential. As currently implemented, this process inaccurately classifies many pollutants as presenting a risk when in fact they do not.

In the SFPUC letter of May 30, 2008, to the Water Board, we proposed that the Water Board consider use of the California Ocean Plan reasonable potential procedure.² This Ocean Plan procedure is technically superior in assessing the factors that identify the risk of an exceedance. The Ocean Plan approach is similar to that in EPA’s *Technical Support Document for Water Quality-Based Toxics Control*³ but has been updated with more sophisticated mathematical techniques for assessing data.

While the Water Board currently follows the State Implementation Policy (SIP) procedures for assessing priority pollutants, it has the discretion to use the Ocean Plan procedure for non-priority pollutants such as ammonia. The Water Board should evaluate this option as part of the Triennial Review. In addition, we urge the Regional Water Board to support use of the Ocean Plan procedure during SIP revisions.

2. Mixing Zones / Dilution Factors

The SFPUC proposes the Triennial Review evaluate use of the mixing zone/dilution factor procedure outlined in the SIP that provides a more accurate assessment of actual dilution. The dilution factor has a direct effect on the calculation of effluent limits. The Water Board’s current policy in issuing permits is to apply a 10:1 dilution credit for deep water discharges to the San Francisco Bay regardless of the actual dilution an outfall may show through modeling or field dilution studies. Thus, the permit effluent limitations

¹ This policy known formally as the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, 2005, [posted](#)

² See Reasonable Potential Analysis Procedure presented in California Ocean [Plan](#) Appendix VI. Also see the California Ocean Plan *Reasonable Potential Analysis Calculator (RPCalc)*

³ *Technical Support Document for Water Quality-Based Toxics Control*, EPA, March, 1991, <http://www.epa.gov/npdes/pubs/owm0264.pdf>

are based on a maximum assumed dilution of ten parts Bay water to one part effluent for deep water discharges. (This results in a dilution factor $D = 9$.) Recently, the Water Board allowed an exception to the 10:1 dilution ratio cap for ammonia, a non-bioaccumulative pollutant, and a partial excursion from the 10:1 dilution ratio cap for cyanide. Modeling by San Francisco and other Bay Area POTWs shows that dilution is typically much higher than the 10:1 cap imposed by the Regional Water Board.

The approach currently used by the San Francisco Bay Regional Water Board conflicts with the requirements in the State Implementation Policy that allow the use of site-specific information to determine dilution (see SIP pg. 16 – *Completely Mixed Discharges* and *Incompletely Mixed Discharges*). The SIP explicitly supersedes Basin Plan mixing zone policies:

Except as provided in section 4, this Policy supersedes basin plan provisions to the extent that (1) they apply to implementation of water quality standards for priority pollutants, and (2) they regard the same subject matter as that addressed in this Policy with respect to priority pollutant standards. For example, the Policy supersedes basin plan mixing zone provisions to the extent that they apply to implementation of water quality standards for priority pollutants. [*Excerpted from SIP, pg. 2; emphasis added*]

As allowed by the SIP, a preferable approach used for calculating dilution credits (i.e., establishing a mixing zone) would rely on the procedures discussed in the *Technical Support Document for Water Quality-based Toxics Control* (EPA, 1991). In addition, U.S. EPA developed and continues to improve on a series of mathematical models for determining dilution factors for wastewater discharges (EPA's *Visual Plumes*).⁴

The conservative (capped) determination of dilution credit has been justified on the basis that the Regional Water Board allows a less restrictive “background” value during calculations of effluent limitations. (The background and the dilution credit are major factors in the calculation of effluent limitations.) Thus the conservative dilution cap is presumably balanced by the “liberal” use of background values distant from the discharge. However, this balancing approach results in skewed results for discharges into waterways near where the background values have been assessed. Therefore, it is important to use a more accurate dilution factor (as well as appropriate background values).

The Regional Water Board has also stated that it maintains its original policy of 10:1 maximum dilution as a conservative approach for addressing imperfect mixing, the potential for bioaccumulation, and Bay water toxicity among other reasons. However, the use of (worst case) measured background values already accounts for possible limited mixing. In addition, San Francisco Bay is not a closed system. The Bay has two tidal cycles per day and has substantial turnover. The volume of water moving in and out of

⁴ The Visual Plumes model system is a Windows-based software application for simulating surface water jets and plumes. It also assists in the preparation of mixing zone analyses, Total Maximum Daily Loads (TMDLs), and other water quality applications

the San Francisco Bay estuary in each tidal cycle represents approximately 24 percent of its total volume.⁵ The ambient background concentration is used in the calculation of limits following SIP procedures and therefore any increased concentration due to previous or other discharges is taken into account. Bioaccumulation is already addressed in the setting of the criteria, which are much more restrictive for constituents with bioaccumulation potential. Toxicity is addressed directly by both chronic and acute toxicity limits.

In other estuaries such as Puget Sound, actual dilution is used as determined by U.S. EPA models, and different dilution factors are calculated for both acute and chronic criteria. For example, the Tacoma discharge to a bay in the southern part of Puget Sound has dilution factors ranging from 25:1 (acute criteria) to 179:1 (human health carcinogens).⁶

The San Francisco Bay Regional Water Board should use actual dilution as allowed by the SIP and specified in U.S. EPA guidance. The resulting permits would be more in line with the current science of mixing zones and dilution modeling. The permits would also conform to the SIP.

3. Wet Weather Standards

The triennial review plan should include an assessment of approaches to address intermittent wet weather urban runoff discharges. This issue affects all municipal separate sewer systems (MS4s), as well as San Francisco, which has a combined sewer system. This issue can be addressed by the development of a wet weather subcategory of beneficial uses, the use of variances, or some other approach. In other words, the review should consider that beneficial use designations and associated objectives should specifically reflect wet weather and dry weather period variability, particularly during storm flow conditions.

As part of this effort, the assessment of wet weather standards should explicitly recognize and take into account the physical characteristics and natural variability in watersheds, including climate, meteorology, geology and soils, and hydrologic patterns. This variability can affect compliance with standards even in undeveloped locations. Recent U.S. EPA-sponsored research in California shows the variability in wet weather stream flows in undeveloped watersheds.⁷

⁵ A.N. Cohen, *An Introduction to the San Francisco Estuary* (2000)

⁶ See the Fact Sheet, page 14, posted at:
http://govme.cityoftacoma.org/download/rfp/NPDES/NPDES_Prmt.pdf

⁷ *Quantification of Natural Contributions During Wet and Dry Weather for Derivation of Load Allocations and Numeric Targets*, USEPA Contract No. CP97983901, Eric Stein and Vada Yoon, Southern California Coastal Water Research Project, 7171 Fenwick Lane, Westminster CA 92683, www.sccwrp.org, October 15, 2005.

There are also several recent studies that show constituent variability in urban and highway runoff from surface water quality measurements⁸ and surface dirt measurements⁹. The need to address wet weather discharge criteria is demonstrated by the filing of a lawsuit in March 2008, by the Natural Resources Defense Council (NRDC) and the Santa Monica Baykeeper against Los Angeles County and the City of Malibu. The lawsuits allege violations of water quality standards extending back to 2002 for a range of constituents including copper, lead, zinc, cadmium, nickel, aluminum, bacteria, and many other constituents. In addition, the use of wet weather standards or some other approach for addressing regulatory compliance of stormwater has recently been raised during the triennial review process for the Los Angeles Basin Plan.

Regulatory options for addressing intermittent conditions caused by stormwater runoff could include:

- A short-term wet weather variance from compliance with the water quality standards during and immediately following a runoff event.
- Establishment of a wet weather sub-category of standards. Regulatory agencies have supported wet weather uses related to recreation and bacteria objectives,¹⁰ however, the wet weather designation would include other parameters.
- Development of guidelines, similar to the SIP, specifying when water quality objectives and beneficial use designations are to apply to infrequent or substantial storm flows and implementation requirements.

⁸Comparisons of Caltrans runoff quality data with CTR and other relevant water quality objectives in Discharge Characterization Study Report; CTSW-RT-03-065.51.42; Posted.

⁹ Street dirt chemical quality, in *National Management Measures to Control Nonpoint Source Pollution from Urban Areas, Management Measure 7: Bridges and Highways*; USEPA; November 2005. posted.

¹⁰ See "When is it appropriate to modify primary contact recreation uses to reflect high flow situations?" in *Implementation Guidance for Ambient Water Quality Criteria for Bacteria*, U.S. EPA, March 2004, posted.

Attachment 2 – SFPUC Basin Plan Triennial Review Support Letter, May 30, 2008





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May 30, 2008

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GENERAL MANAGER

Subject: Basin Plan Triennial Review – Support for the Evaluation of the Shellfish Beneficial Use for San Francisco Bay and Adoption of U.S. EPA Beach Act Recreational Contact Standards

Dear Ms. Feger:

The City and County of San Francisco Public Utilities Commission (PUC) appreciates the opportunity to provide comment on the San Francisco Bay Regional Water Quality Control Board (Water Board) triennial review process for the San Francisco Bay Basin Plan. We recognize that the Water Board staff has identified several focus areas for review and update and that each of these areas will require staff resources for completion. The San Francisco PUC strongly supports the prioritization of the following topics:

- Evaluation of the shellfish beneficial use for San Francisco Bay
- Adopt U.S. EPA Beach Act recreational contact standards

Evaluation of the Shellfish Beneficial Use for San Francisco Bay

The San Francisco PUC agrees with the issue description for shellfish beneficial use evaluation and strongly supports the determination of spatial and temporal patterns of shellfish harvesting uses. In this process, we suggest that refinements to shellfish designations in the San Francisco Bay Basin Plan be consistent with the "National Shellfish Sanitation Program, Guide for the Control of Molluscan Shellfish". This guidance includes classification criteria for approved, restricted, conditional, prohibited, and unclassified shellfish growing areas. Classifications may be dependent on existing and ongoing conditions and activities occurring within the San Francisco Bay and/or may be reflective of temporal conditions such as rain events.

Adopt U.S. EPA Beach Act Recreational Contact Standards

The San Francisco PUC strongly supports the adoption of national U.S. EPA recreational water contact standards of enterococci bacteria for estuarine waters and *Escherichia coli* for freshwater as water quality objectives in the San Francisco Bay Basin Plan. These standards would replace the existing outdated and ineffective San Francisco Bay Basin Plan bacteria water quality objectives for total coliform, revise the implementation plan and be protective of water quality.

We also strongly encourage the designation and inclusion of sub-categorical beneficial uses for water contact recreation that includes different water quality objectives for full

body submersion water contact than for limited or incidental water contact, which would have a lower health risk. We propose that it is feasible to apply spatial designation of sub-categorical water contact beneficial uses within the San Francisco Bay that would be protective.

The San Francisco PUC also sees the evaluation of shellfish beneficial uses and the adoption of national bacteria criteria into the San Francisco Basin Plan as an opportunity to explore the development of wet weather criteria for the San Francisco Bay. We would support Water Board staff efforts for this process and are willing to provide assistance to move in this direction.

Although not on the existing list of focus areas identified by Water Board staff for the triennial review, the San Francisco PUC would like to suggest and support the evaluation for accuracy and ultimate inclusion of the California Ocean Plan reasonable potential analysis process into the San Francisco Basin Plan for use in determining effluent limitations during the NPDES permit reissuance process. We believe that the process defined in the California Ocean Plan reflects a more accurate determination of the likelihood that water quality objectives will be exceeded.

Thank you for the opportunity to comment on the San Francisco Bay Basin Plan Triennial Review process. Please contact me if you have any questions or would like additional information.

Sincerely,



Arleen Navarret, Regulatory Manager
San Francisco Public Utilities Commission
Wastewater Enterprise
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May 7, 2009

BY EMAIL: nfeger@waterboards.ca.gov

Naomi Feger
Senior Environmental Scientist
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
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Subject: Basin Plan Triennial Review – Support for Designation of Hayward Marsh Beneficial Uses

Dear Ms. Feger:

The Union Sanitary District (USD) would like to provide our continuing and strong support for inclusion of the Hayward Marsh beneficial use designation in the basin Plan Triennial Review process.

Thank you for the opportunity to comment on the Basin Plan Triennial Review process. We look forward to working with you on this important project. Please let us know if you have any questions or would like additional information. Thank you.

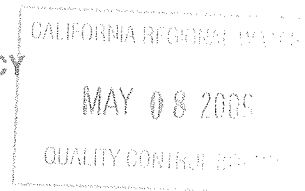
Sincerely,

David Livingston
Manager/Treatment & Disposal Services
Union Sanitary District
Phone: (510) 477-7560
Email: david_livingston@unionsanitary.com

cc: Monica Oakley, Oakley Water Strategies
Heather Ottaway, RWQCB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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May 7, 2009

Naomi Feger
Senior Environmental Scientist
California Regional Water Quality Control Board,
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Oakland, CA 94612

Dear Naomi:

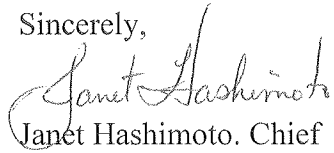
This letter is in response to the California Regional Water Quality Control Board, San Francisco Bay Region's (Regional Board's) request for comments on the 2009 Basin Plan Triennial Review Tentative Resolution and supporting Staff Report dated April 2009. Thank you for your continued hard work, as you complete this Triennial Review priority-setting process, and start the subsequent Basin Planning review and amendment process for the priority issues. Our comments are summarized below, and focus on the Triennial Review priorities. We may have specific concerns on each of the priority issues, as they are raised through the basin planning process.

We continue to support as high priorities the following, as listed in Attachment 1 of the draft Resolution: 1. Stream and Wetlands Systems Protection Policy; 2. Update of Significant Water Bodies and their Beneficial Uses; 3. Adoption of USEPA BEACH Act Marine Recreational Contact Criteria as Objectives; 4. Designation of Beneficial Uses for Hayward Marsh; 5. Development of Bioassessment Objectives; and 7. Numeric Nutrient Criteria. We continue to support the remaining issues as important priorities.

We continue to support three issues that were considered, but not included on the final list in Attachment 1: 11. Whole Effluent Toxicity (WET) Requirements; 14. Cadmium Water Quality Objectives; and 16. Pentachlorophenol (PCP) Water Quality Objectives. We understand the State Board intends to address the WET requirements and the cadmium objectives through amendments to the Statewide Implementation Policy (SIP). However, we continue to support as a high priority, and recommend the Board address and revise as appropriate, PCP water quality objectives in waters that support early life stages of salmonids, as part of this Triennial Review process. This request is a result of US EPA's Endangered Species Act consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service for the California Toxics Rule. It is important that protective water quality standards for PCP are adopted as soon as possible, to protect early life stages of salmonids, which are critically important species in many Regional Board 2 waterbodies.

We look forward to working with you further on the priority issues identified through this Triennial Review process. If you have any questions, please do not hesitate to call me at (415) 972-3452, Diane Fleck at (415) 972-3480, or Nancy Yoshikawa at (415) 972-3535.

Sincerely,

A handwritten signature in cursive script that reads "Janet Hashimoto".

Janet Hashimoto, Chief

Standards and TMDL Office

cc: Tom Maurer, U.S. Fish and Wildlife Service
Joe Dillon, National Marine Fisheries Service



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

May 7, 2009

Naomi Feger, Senior Environmental Scientist
Regional Water Quality Control Board – SF Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: ***Basin Plan Triennial Review***

Dear Ms. Feger,

Thank you for the opportunity to comment on the Basin Plan Triennial Review. Our comments are in the context of the Zone 7 Water Agency's mission to provide drinking water, non-potable water for agriculture/ irrigated turf, flood protection, and groundwater and stream management within the Livermore-Amador Valley.

Our comments are identified by the ranking number and title in your April 2009 Triennial Review Staff Report.

As always, we offer you our assistance in accessing local water data and expertise, as needed. If you have any questions or comments, please feel free to contact Elke Rank at (925) 454-5005.

Sincerely,



G.F. Duerig
General Manager

cc: Kurt Arends, Dave Lunn, Matt Katen, Joe Seto, Mary Lim, Elke Rank – Zone 7 Water Agency
Jan O'Hara – Regional Water Quality Control Board

attachments: (1) Table 1
(2) Zone 7 Water Agency June 2008 letter to RWQCB re: Triennial Review

Comments by Issue:

Issue 1. Complete Stream and Wetland Systems Protection Policy

Zone 7 provided similar comments (as follows) to the State Water Resources Control Board in 2008 in response to their request for comments on the Policy to Protect Wetlands and Riparian Areas. These comments are also applicable to the Regional Water Board's policy development.

First, Zone 7 Water Agency recognizes the importance of functional wetlands and riparian areas in providing valuable water quality functions such as flood protection, pollutant filtration, water supply and replenishment, recreation, and habitat for a wide variety of plants and animals. As such, we agree with the need for a single, state-wide definition and policy for waters of the state to help protect these important areas. A regional definition/policy (e.g., the San Francisco and North Coast Boards) is a step in the right direction, but it should be consistent, if not identical, to the State's definition/policy.

The proposed policy should not unduly expand regulatory requirements (and thereby the administrative burden) associated with ongoing maintenance activities for certain existing flood protection facilities. In determining the new wetland definition, please consider how the new policy might interface with locally adopted flood protection and stream maintenance plans, among other plans and policies.

Also, the proposed policy should avoid any unnecessary duplication in regulatory oversight of stream and wetland areas by multiple state agencies, and should streamline the permitting process wherever possible.

Issue 2. Complete the Update of Significant Water Bodies and the Associated Beneficial Uses, Update Maps

Table 1, attached, includes comments on the beneficial use designations for the new water bodies proposed for inclusion in the Basin Plan. We have also included other general information about these water bodies for your reference.

In addition to these written comments, we would like to offer you a guided tour of some or all of the creeks listed in Table 1, all of which could be accomplished in one day. We think you will find a first hand view of the creeks in eastern Alameda County very useful in completing the update of the Basin Plan. In particular, you will find in some cases that the upper portion of a creek looks and functions very differently than the lower portion. For example, in Dublin, some creeks are more natural and accessible in the upper watershed but serve as narrow, concrete-lined flood control ditches in the lower, more urbanized areas, returning to more natural conditions only in short sections of less urbanized areas. Also, most of the arroyos in the Livermore-Amador Valley are dry (or partially dry) during the summer. Some creeks may have limited artificial water flows during the summer when we release imported Delta water from the South Bay Aqueduct, which can be very warm.

Zone 7 does not own and/or manage the entire extent of the water bodies in our region, but in the course of our work we have come to know them well. The Cities of Dublin, Pleasanton and Livermore also own segments, and are likely to also have specific information about the water

bodies in their respective areas. Additionally, East Bay Regional Parks District and Livermore Area Recreation and Parks District are good sources of information about the arroyos in their jurisdictions. Finally, other sections within Zone 7's flood protection service area are held by San Francisco Public Utilities Commission or other private entities.

Issue 9. Water Recycling Policy

The Regional Water Board policy on recycled water should be consistent with the State Water Board's policy. The issue summary in the Triennial Review Staff Report suggests it might not be reflective of the State policy.

Issue 10. Marine Debris

This issue needs to be further clarified before water quality objectives can be established. Specifically, the term "significant impacts to" the Bay should be defined and explored.

Issue 20. Refine Alameda Creek Watershed Total Dissolved Solids (TDS) and Chloride Water Quality Objectives

Please refer to our June 5, 2008 comment letter, attached.

Issue 23. Climate Change and Water Resources Policy

This issue should receive a higher priority ranking. As you know, climate change will impact water availability and quality, as well as flood protection needs, in our area. A clear, consistent message on climate change needs to be reflected in all of the State and Regional Water Boards' policies and decisions. This Basin Plan project could also go so far as to help local water agencies develop and implement their own climate change policies, and opportunities for education on this issue.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
<p>1. Alamo Canal</p> <ul style="list-style-type: none"> ○ <i>West Dublin</i> ○ <i>Tributary to Arroyo de la Laguna</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Alamo Canal: <ul style="list-style-type: none"> ▪ REC-1 (E) ▪ REC-2 (E) ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Alamo Canal: <ul style="list-style-type: none"> ▪ MIGR (E) may not be suitable for Alamo Canal. Consider conducting field verification by a fisheries biologist. <p><u>Description</u></p> <ul style="list-style-type: none"> - Alamo Canal is a flood-control channel which originates north of I-580 as Alamo Creek, which drains Dougherty Valley. Water drains to the canal from creeks to the west, including Dublin Creek, and from South San Ramon Creek to the north, which connects to the canal near Dublin Boulevard. - Arroyo del Valle and Arroyo Mocho converge on the floor of the Livermore-Amador Valley and drain into Arroyo de la Laguna at its confluence with Alamo Canal.
<p>2. Alamo Creek</p> <ul style="list-style-type: none"> ○ <i>Northwest Dublin</i> ○ <i>Drains to Alamo Canal</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Alamo Creek: <ul style="list-style-type: none"> ▪ RARE (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E) ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Alamo Creek: <ul style="list-style-type: none"> ▪ COLD (P) may not be suitable for Alamo Creek. Consider conducting field verification of suitable habitat and water temperature. ▪ MIGR (E) may not be suitable for Alamo Creek. Consider conducting field verification by a fisheries biologist. ▪ GWR (E) is not suitable for Alamo Creek; it is not used for this purpose.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<p><u>Description</u></p> <ul style="list-style-type: none"> - Zone 7’s Steam Management Master Plan (SMMP) includes the Alamo Creek Flood Control Program project, which has a goal to restore capacity of Alamo Canal for 100-year flood flows and lower an existing maintenance road. - Alamo Creek becomes Alamo Canal in the vicinity of Dublin Boulevard.
<p>3. Altamont Creek</p> <ul style="list-style-type: none"> o <i>East Livermore</i> o <i>Tributary to Arroyo las Positas</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Altamont Creek: <ul style="list-style-type: none"> ▪ GWR (E) ▪ WILD (E) ▪ RARE (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ WARM (E)* - Zone 7 has concerns with the following proposed beneficial uses for Altamont Creek: <ul style="list-style-type: none"> ▪ WARM (E) may not be suitable for segments of upper Altamont Creek during some years, as staff can recall little or no stream flow in many months of some years. Consider conducting field verification of suitable habitat and water temperature. <p><u>Description:</u></p> <ul style="list-style-type: none"> - Used periodically by Zone 7 to convey water from South Bay Aqueduct (SBA) (State Water Project) for irrigation purposes (i.e., Springtown Golf Course). Without this conveyance, Altamont Creek would be dry in most months. - Used by Zone 7 for groundwater recharge, or to improve water quality of the water that is recharging along Arroyo Las Positas. - Existing recreational trails along creek, and agricultural uses. - Area of high alkalinity and a source of TDS for downstream reaches. - Zone 7’s Steam Management Master Plan (SMMP) includes the <i>Altamont Creek Improvements</i> and <i>Alkali Sink Management</i> projects. The former will create a system of regional trails and provide connectivity between existing trails. The latter is intended to protect and enhance the natural habitat in the preserve. - Characterized in SMMP as an area of sediment deposition.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
<p>4. Arroyo de la Laguna</p> <ul style="list-style-type: none"> ○ <i>West Dublin & Pleasanton</i> ○ <i>Tributary to Alameda Creek</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Arroyo de la Laguna: <ul style="list-style-type: none"> ▪ GWR (E) ▪ MIGR (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E)* ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Arroyo de la Laguna: <ul style="list-style-type: none"> ▪ COLD (E) may not be suitable for Arroyo de la Laguna, especially in areas above Castlewood. Consider conducting a field verification of suitable habitat and water temperature. ▪ *We are unsure of suitable habitat to support SPWN designation. Consider conducting field verification by a fisheries biologist. <p><u>Description:</u></p> <ul style="list-style-type: none"> - The Arroyo de la Laguna conveys the outflow from the Livermore-Amador basin. It contains a mixture of outflow from Alamo Canal, Arroyo Mocho, Arroyo Las Positas and Arroyo Valle, and groundwater from the Bernal subbasin.
<p>5. Arroyo del Valle</p> <ul style="list-style-type: none"> ○ <i>South Pleasanton & Livermore</i> ○ <i>Tributary to Arroyo de la Laguna</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Arroyo del Valle <i>below the dam</i>: <ul style="list-style-type: none"> ▪ GWR (E) ▪ MIGR (P)* ▪ RARE (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Arroyo del Valle: <ul style="list-style-type: none"> ▪ COLD (E) may not be suitable for Arroyo del Valle. Consider conducting field verification of suitable habitat and water temperature.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<ul style="list-style-type: none"> ▪ FRSH may only apply above the dam, not below. ▪ MUN applies above the dam and to the reservoir, but not below the dam. ▪ WARM (E) may not be suitable for Arroyo del Valle. Consider conducting field verification of suitable habitat and water temperature. ▪ *Sections of Arroyo del Valle, including the areas of old gravel mines, may not currently be suitable for MIGR (P) designation. Consider conducting field verification by a fisheries biologist. <p><u>Description</u></p> <ul style="list-style-type: none"> - Below the dam, Arroyo del Valle is used for groundwater recharge (GWR) using the natural and imported (via South Bay Aqueduct) water. It is also used for conveyance/disposal for mining company dewatering operations. - The middle reach of Arroyo del Valle between Del Valle Dam and Arroyo de la Laguna is comprised of very large ponds left over from gravel mining.
<p>6. Arroyo las Positas</p> <ul style="list-style-type: none"> ○ Livermore ○ Tributary to Arroyo Mocho 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Arroyo las Positas: <ul style="list-style-type: none"> ▪ GWR (E) ▪ RARE (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E)* ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Arroyo las Positas: <ul style="list-style-type: none"> ▪ COLD (P) may not be suitable for Arroyo las Positas. Consider conducting field verification of suitable habitat and water temperature. ▪ MIGR (E) may not be suitable for Arroyo las Positas. Consider conducting field verification by a fisheries biologist. ▪ *We are unsure of suitable habitat to support SPWN designation. Consider field verification by a fisheries biologist.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<p><u>Description</u></p> <ul style="list-style-type: none"> - The watershed is characterized by heavily incised channels through mainly commercial, agricultural, and ranch lands. All channels in this watershed are either flood control channels or natural channels traversing heavily grazed grasslands. - The Arroyo las Positas includes outflows from the following streams and creeks (generally listed from east to west): Arroyo Seco, Altamont Creek, Cayetano Creek, Collier Canyon Creek, and Cottonwood Creek. - Arroyo las Positas differs widely upstream and downstream from Airway Boulevard, which separates the upstream maintained stream channel from natural areas in Arroyo las Positas Golf Course.
<p>7. Arroyo Mocho</p> <ul style="list-style-type: none"> o <i>South Livermore and Pleasanton</i> o <i>Tributary to Arroyo de la Laguna</i> <p>(note: staff do not recognize the alternate name, “Northern Drainage” as suggested by RWQCB)</p>	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Arroyo Mocho: <ul style="list-style-type: none"> ▪ GWR (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E) ▪ WARM (E)* ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Arroyo Mocho: <ul style="list-style-type: none"> ▪ COLD (E) may not be suitable for Arroyo Mocho. Consider conducting field verification of suitable habitat and water temperature. ▪ MIGR (E) may not be suitable for Arroyo Mocho. Consider conducting field verification of by a fisheries biologist. ▪ *WARM (E) may only be suitable only during certain months of the year when there is sufficient water, and when it is not overly warm for fish. Consider conducting field verification of suitable habitat and water temperature. <p><u>Description</u></p> <ul style="list-style-type: none"> - Natural inflow into the Arroyo Mocho is from the Upland Mocho and Mocho Drainage Basins. - The Arroyo Mocho flows include South Bay Aqueduct releases directly into the arroyo, outflows from one of the two creeks named ‘Dry Creek’ in the valley, discharges from the mining area, and urban run-off. - Arroyo Mocho is an important source of groundwater recharge in Zone 7, particularly between

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	Robertson Park and the Chain of Lakes area. - High inter-annual flow variability.
8. Arroyo Seco o <i>Eastern Livermore</i> o <i>Tributary to Arroyo las Positas</i>	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Arroyo Seco: <ul style="list-style-type: none"> ▪ GWR (E) ▪ RARE (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E) ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Arroyo Seco <ul style="list-style-type: none"> ▪ COLD (P) may not be suitable for Arroyo Seco. Consider conducting field verification of suitable habitat and water temperature. ▪ MIGR (E) may not be suitable for Arroyo Seco. Consider conducting field verification by a fisheries biologist. <p><u>Description</u></p> <ul style="list-style-type: none"> - Zone 7's Steam Management Master Plan (SMMP) includes the <i>Arroyo Seco Improvements Project</i>, with goals to improve flood protection and habitat. The SMMP also includes the <i>Arroyo Seco Trail Project</i>, which includes conversion of existing maintenance roads to multi-use trails and construction of a new bike trail.
9. Cayetano Creek 10. Collier Canyon Creek 11. Cottonwood Creek o <i>North Livermore</i> o <i>Tributary to Arroyo las Positas</i>	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Cayetano Creek, Collier Canyon Creek, and Cottonwood Creek: <ul style="list-style-type: none"> ▪ REC-1 (E) ▪ REC-2 (E) ▪ WILD (E) ▪ RARE (E) - Zone 7 has concerns with the following proposed beneficial uses for Cayetano Creek, Collier Canyon Creek, and Cottonwood Creek:

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<ul style="list-style-type: none"> ▪ WARM may not be suitable for these creeks. Consider conducting field verification of suitable habitat and water temperature. ▪ GWR is not suitable; these creeks drain to Arroyo Las Positas, which is an important area for artificial groundwater recharge, but these creeks are not themselves recharge areas. <p><u>Description:</u></p> <ul style="list-style-type: none"> - Cottonwood Creek, Collier Creek, and Cayetano Creek all drain to Arroyo las Positas. - Zone 7's Steam Management Master Plan (SMMP) includes the <i>North of I-580 Trail System</i> project, which intends to promote recreational corridors along Arroyo las Positas tributaries (Cottonwood Creek, Collier Creek, and Cayetano Creek) north of I-580, and to create a system of regional trails.
<p>12. Del Valle Reservoir</p> <ul style="list-style-type: none"> o <i>South of Livermore</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for for Del Valle Reservoir: <ul style="list-style-type: none"> ▪ COLD (E) ▪ COMM (E) ▪ FRSH (E) ▪ MUN (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E) ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Del Valle Reservoir: <ul style="list-style-type: none"> ▪ GWR (E) may not be a suitable. There is no on-site recharge; rather, some of the water is released for recharge in downstream areas. Verify with DWR. <p><u>Description</u></p> <ul style="list-style-type: none"> - Department of Water Resources owned and operated facility for water storage and flood protection. On average, approximately half of the stored water in the reservoir is imported from the South Bay Aqueduct, with the other half being local runoff.
<p>13. Dublin Creek</p> <ul style="list-style-type: none"> o <i>South Dublin & West Pleasanton</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for <i>upper</i> Dublin Creek only: <ul style="list-style-type: none"> ▪ WILD (E)

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
<ul style="list-style-type: none"> ○ <i>Drains to Alamo Canal</i> 	<ul style="list-style-type: none"> - Zone 7 has concerns with the following proposed beneficial uses for Dublin Creek: <ul style="list-style-type: none"> ▪ WARM (E) may not be suitable for Dublin Creek. Consider conducting field verification of suitable habitat and water temperature. ▪ REC-1 and REC-2 (E) may not be suitable for Dublin Creek; much of Dublin Creek is not accessible. Suggest field verification. <p><u>Description:</u></p> <ul style="list-style-type: none"> - Dublin Creek in the vicinity of 580/680 Interchange is a concrete lined channel with concrete culverts. Upper portion on private land, and is thought to be small but natural.
<p>14. Happy Valley Creek</p> <ul style="list-style-type: none"> ○ <i>South Pleasanton</i> ○ <i>Tributary to Arroyo de la Laguna</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Happy Valley Creek: <ul style="list-style-type: none"> ▪ REC-1 (E) ▪ REC-2 (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Happy Valley Creek: <ul style="list-style-type: none"> ▪ WARM (E) may not be suitable for Happy Valley Creek. Consider conducting field verification of suitable habitat and water temperature. <p><u>Description:</u></p> <ul style="list-style-type: none"> - Intermittent creek that drains to Arroyo de la Laguna, an area for artificial groundwater recharge, but is not itself a recharge area. - Location of the Callippe Preserve golf course.
<p>15. Martin Canyon Creek</p> <ul style="list-style-type: none"> ○ <i>West Dublin</i> ○ <i>Tributary to Alamo Creek</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Martin Canyon Creek: <ul style="list-style-type: none"> ▪ REC-1 (E) ▪ REC-2 (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Martin Canyon Creek: <ul style="list-style-type: none"> ▪ WARM (E) may not be suitable for Martin Canyon Creek. Consider conducting field verification of suitable habitat and water temperature.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<p><u>Description:</u></p> <ul style="list-style-type: none"> - In 1999 a restoration project consisting of gradient control and bank stabilization structures was completed. - Location of the Martin Canyon Creek Trail.
<p>16. Shadow Cliffs Reservoir</p> <ul style="list-style-type: none"> o <i>East Pleasanton</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Shadow Cliffs Reservoir: <ul style="list-style-type: none"> ▪ COMM (E) ▪ GWR (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ SPWN (E)* ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Shadow Cliffs Reservoir: <ul style="list-style-type: none"> ▪ FRSH is not suitable for Shadow Cliffs because this is not fresh water (except for rainfall into the reservoir); it is artificial storage of imported South Bay Aqueduct water ▪ COLD may not be suitable for Shadow Cliffs as there is no migratory route into this reservoir (an old gravel mine). ▪ *We are unsure of suitable habitat to support SPWN designation for Shadow Cliffs; suggest confirming with EBRPD or field verification. <p><u>Description</u></p> <ul style="list-style-type: none"> - Location of Shadow Cliffs Regional Recreation Area, managed by the East Bay Regional Parks District. - Used by Zone 7 for groundwater recharge (GWR).
<p>17. Sinbad Creek</p> <ul style="list-style-type: none"> o <i>North Sunol</i> o <i>Tributary to Arroyo de la Laguna</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Sinbad Creek: <ul style="list-style-type: none"> ▪ MIGR (E) ▪ RARE (E) ▪ REC-1 (E) ▪ REC-2 (E) ▪ WILD (E)

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<ul style="list-style-type: none"> - Zone 7 has concerns with the following proposed beneficial uses for Sinbad Creek: <ul style="list-style-type: none"> ▪ COLD and WARM may be suitable for Sinbad Creek but staff has commented that the creek often appears dry in summer months. Suggest confirming with San Francisco Public Utilities Commission. ▪ We are unsure of suitable habitat to support SPWN designation for Sinbad Creek; staff recalls many large boulders and little or no smaller material. Suggest confirming with San Francisco Public Utilities Commission. <p><u>Description:</u></p> <ul style="list-style-type: none"> - Sinbad Creek is a small, natural channel that supports mixed riparian woodland habitat. - Drains to Arroyo de la Laguna below the area outside of the groundwater recharge area. - Sinbad Creek is regarded as potential steelhead habitat based on historic occurrences, but habitat values may be marginal since resident trout have not persisted in the creek. - Location of Sinbad Creek Trail. - Zone 7's Steam Management Master Plan (SMMP) includes the <i>Sinbad Creek Project</i>, which will stabilize the bank at confluence of Sinbad Creek with Arroyo de la Laguna, and identifies an important opportunity for public outreach and education through an Adopt-a-Creek program.
<p>18. South San Ramon Creek</p> <ul style="list-style-type: none"> o <i>West Dublin/San Ramon</i> o <i>Drains to Alamo Canal</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for South San Ramon Creek: <ul style="list-style-type: none"> ▪ REC-1 (E) ▪ REC-2 (E) ▪ WARE (E) ▪ WILD (E) <p><u>Description:</u></p> <ul style="list-style-type: none"> - South San Ramon Creek originates in Watson Canyon and drains the southern San Ramon and Dublin areas. This creek receives stormwater runoff from developed areas in the San Ramon Valley. South San Ramon Creek discharges to the Alamo Canal. - Zone 7's Steam Management Master Plan (SMMP) includes the <i>Alamo Canal/South San Ramon Creek Erosion Control</i> project, which will stabilize the banks of Alamo Canal and South San Ramon Creek in order to decrease sediment load and curtail aggradation along the lower reaches of Alamo Canal.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<ul style="list-style-type: none"> - Characterized in SMMP as an area of channel bed erosion. - Being actively protected as of 2007 by the City of San Ramon and other entities to preserve riparian zone habitat. - The Iron Horse Trail runs along a portion of South San Ramon Creek.
<p>19. Sycamore Creek</p> <ul style="list-style-type: none"> o <i>South Pleasanton</i> o <i>Tributary to Arroyo de la Laguna</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 recommends the following beneficial uses for Sycamore Creek: <ul style="list-style-type: none"> ▪ REC-1 (E) ▪ REC-2 (E) ▪ WILD (E) <p><u>Description:</u></p> <ul style="list-style-type: none"> - An intermittent creek which combines with Mission Creek and Kottinger Creek (also intermittent creeks) at an un-named canal which drains to Arroyo de la Laguna, an area for artificial groundwater recharge, but is not itself a recharge area. - Riparian restoration near confluence with Arroyo de la Laguna.
<p>20. Tassajara Creek</p> <ul style="list-style-type: none"> o <i>Pleasanton and Dublin</i> o <i>Tributary to Arroyo Mocho</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Tassajara Creek: <ul style="list-style-type: none"> ▪ RARE (E) ▪ REC-1 (E) ▪ REC-1 (E) ▪ SPWN (E) ▪ WARM (E)* ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Tassajara Creek: <ul style="list-style-type: none"> ▪ GWR is not a suitable designation for Tassajara Creek; it is not used for this purpose. ▪ COLD (P) may not be suitable for Tassajara Creek. Consider conducting field verification of suitable habitat and water temperature. ▪ MIGR (E) may not be suitable for Tassajara Creek. Consider conducting field verification by a fisheries biologist. ▪ *WARM (E) may apply more appropriately to lower reach only, as there is little water in the upper reach to support fisheries.

Table 1. Potential New Water Bodies and Suggested Beneficial Uses for Water Bodies in Zone 7 Service Area

Water Body & Location	Notes & Suggested Beneficial Uses
	<p><u>Description</u></p> <ul style="list-style-type: none"> - Very low flow in upper (northern) reach. North of I-580, Tassajara Creek is a losing stream, that is, water flows from the creek, infiltrating the surrounding groundwater basin at a rate of approximately 1.35 cfs. - Zone 7's Steam Management Master Plan (SMMP) includes the Tassajara Creek Improvement Project, which is aimed at alleviating capacity problems in the lower reach of Arroyo Mocho and promote regional trail and connectivity.
<p>21. Vallecitos Creek</p> <ul style="list-style-type: none"> o <i>East of Sunol</i> o <i>Tributary to Alameda Creek</i> 	<p><u>Beneficial Uses:</u></p> <ul style="list-style-type: none"> - Zone 7 concurs with the following proposed beneficial uses for Vallecitos Creek: <ul style="list-style-type: none"> ▪ COLD (P)* ▪ REC-1 (E) ▪ REC-1 (E) ▪ WARM (E) ▪ WILD (E) - Zone 7 has concerns with the following proposed beneficial uses for Vallecitos Creek: <ul style="list-style-type: none"> ▪ *Suggest confirming water temperatures with San Francisco Public Utilities Commission. <p><u>Description</u></p> <ul style="list-style-type: none"> - Vallecitos Creek is a small tributary to Alameda Creek. Sacramento River water can be released into Vallecitos Creek from the South Bay Aqueduct for use downstream in Fremont. Much of the summertime flow down Alameda Creek, through Niles Canyon is this water from the Sacramento River.



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486

PHONE (925) 454-5000

June 5, 2008

Naomi Feger, Senior Environmental Scientist
Regional Water Quality Control Board – SF Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Comments on 2008 Basin Plan Triennial Review

Dear Ms. Feger,

Thank you for the opportunity to comment on the preparation of the 2008 Basin Plan Triennial Review. Zone 7 of the Alameda County Flood Control and Water Conservation District (Zone 7 Water Agency) supplies treated drinking water to retailers serving nearly 200,000 people in Pleasanton, Livermore, and Dublin. Zone 7 also supplies agricultural water to 3,500 acres, primarily South Livermore Valley vineyards, and provides flood protection to all of eastern Alameda County. Zone 7 manages the Livermore-Amador Groundwater Basin, and as part of that program, imports State Water Project (SWP) water to the area, artificially recharging it as part of a conjunctive management program. About 80 percent of Zone 7's water supply is conveyed through the Delta by the SWP and reaches the service area via the South Bay Aqueduct (SBA). Zone 7 also provides water quality management for the Alameda Creek Watershed above Niles.

Staff reviewed the referenced notice of public solicitation and the accompanying document "Brief Issue Descriptions for the 2008 Triennial Review of the San Francisco Bay Region Water Quality Control Plan." Also, staff attended the May 19 public workshop at your office. As a result, we offer the following comments for your consideration, referenced to the sections in the Brief Issue Descriptions document:

1) Item 2.1: Completion of Update of Significant Water Bodies and their Associated Beneficial Uses.

Zone 7 supports new beneficial use designations for flood peak attenuation and for water quality enhancement. We also support the preparation of a more formal process for revising beneficial use designations. These items were mentioned at the March 19 workshop.

Identifying new significant water bodies for inclusion in the Basin Plan, and designating beneficial uses for those water bodies, should continue to be a high priority for the RWQCB. As a side note, Zone 7 has collected a lot of local data that might prove useful in this endeavor such as GIS data and water quality data. For example: Several arroyos are used for conveyance of surface water for subsequent diversion. This is an important use of the arroyos within the watershed, and knowledge of these historic uses may benefit

the descriptions of beneficial uses within the Basin Plan. Likewise, we would like to offer to assist the RWQCB with updating beneficial uses and water quality objectives for any specific water bodies within our service area that are already listed in the Basin Plan.

2) Item 3.3: Refine Alameda Creek Watershed TDS and Chloride Water Quality Objectives.

Zone 7 supports consideration of revising surface water objectives especially given local reliance on water imported from the SWP. First of all, it is our understanding that the numeric Surface Water Quality Objectives for Alameda Creek and its tributaries (Table 3-7) were originally written in 1975 to eliminate the Publicly Owned Treatment Works (POTW) discharges into the streambeds overlying our groundwater basin while not precluding water agencies from recharging the basin with import water.

Setting numeric objectives was successful in eliminating the in-basin POTW discharges but now it appears that these same objectives might limit Zone 7's ability to recharge the local groundwater basin with imported SBA water through natural creek beds, as this source water often exceeds the existing 90-day mean TDS and chlorides objectives. The future TDS and chloride levels of SBA water are likely to continue degrading and, unless there is a major Delta fix such as a Dual Conveyance system, the water quality of water conveyed through the Delta may continue to decline. In addition, due to court-imposed pumping constraints, Zone 7 may only be able to import excess water for recharging the groundwater basin in the fall when Delta water quality is of lower quality.

Simply stated, while Zone 7's water imports for conjunctive use are an integral part of its groundwater and salt management programs, the current numeric limits could have unintended negative consequences on this program. Zone 7's water quality is highly dependent on the water quality from the Delta, and, therefore, improving Delta water quality is an important step towards meeting local basin objectives. Until there is a Delta fix, we would not want to be restricted from recharging our groundwater basin with SBA water, especially in times of water supply shortages.

As you know, the RWQCB approved Zone 7's Salt Management Plan (SMP) by letter dated September 24, 2004. The SMP was required under Provision D.1.c.ii of RWQCB's "Master Water Recycling Permit," Order No. 93-159, as issued to Zone 7, the City of Livermore and the Dublin San Ramon Services District. The SMP includes a proactive strategy for maintaining groundwater quality and ending the long-standing increase in TDS by removing salts from basin groundwater and exporting the salt concentrate out of the watershed. Zone 7 completed a Groundwater Management Plan in September 2005, covering the Livermore-Amador Valley Groundwater Basin. The Plan documents all of Zone 7's current groundwater management policies and programs and incorporates the SMP by reference. The Basin Plan should acknowledge this and other approved local groundwater management plans.

Again, Zone 7 supports consideration of revising surface water objectives especially given the reliance on SBA imported water, but as the RWQCB states in the Brief Issue

Descriptions document, potential impacts to the Niles Cone groundwater basin must also be considered. Zone 7 suggests that any revisions to water quality objectives for Alameda Creek must acknowledge: (1) the desirable local water quality objectives and beneficial uses (above and below Niles); (2) that unreasonable restrictions could seriously jeopardize our ability to manage critical local groundwater supplies; and (3) the current state of Delta water, our source water. Also, it should be noted that Zone 7's requests for releases of SBA water to Alameda Creek tributaries are managed to maximize groundwater recharge in our Main Basin. To this end, we suggest that the Basin Plan acknowledge the benefits of storing, maintaining, and recovering local and imported surface water in/from the Livermore-Amador groundwater basin as needed. It could be that a multi-year numeric average as a new objective would be something that should be evaluated given the variations in imported water quality related to water year characteristics and seasonal variability. Zone 7 requests the opportunity to participate in any efforts related to revising this water quality objective.

- 3) **Item 3.5: Marine Debris.** Zone 7 supports actions regarding trash and debris that are protective of the Bay and ocean beneficial uses – especially measures that prevent debris or trash from entering our system in the first place. Simple but effective measures include “drains to the bay” stencils on storm drains, education and outreach to children and local businesses about their watershed and actions to keep it clean, and local “drop-off” days for hazardous and electronic waste, etc.
- 4) **Item 4.1: Environmental Screening Levels (ESL) for Groundwater Cleanups.** Zone 7 supports plans to update the ESL approach for groundwater cleanups and to develop a policy to address closure for low-risk contaminant sites, as long as such ESLs maintain a balance with local groundwater basin objectives as set forth in adopted Groundwater Management Plans.
- 5) **Item 5: Update Plans and Policies.** Zone 7 supports the Board's updates of plans and policies relating to water recycling and climate change. We request that we be involved in the RWQCB's policy updates concerning water recycling, and climate change impacts, as well as other environmental impacts, on our water resources.

Zone 7 appreciates the opportunity to comment on this important triennial review and would like to continue to work with RWQCB and other stakeholders as well as to offer any assistance we can provide in accessing local data and expertise. If you have any questions or comments, please feel free to contact either Elke Rank or me at 925-454-5000.

Sincerely,



G.F. Duerig
General Manager