# DRAFT Response to Comments on the Coachella Valley Stormwater Channel Bacterial Indicator TMDL

| No. | Representative | Commenter |
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| 1. | Darrell Mike | Twenty-Nine Palms Band of Mission Indians Tribe |
| 2. | G. Scott McGowen | California Department of Transportation |
| 3. | Steve Bigley | Coachella Valley Water District |
| 4. | Jason E. Uhley | Riverside County Flood Control and Water Conservation District |

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| 1.1 | Darrell Mike | For over a decade, the river has been listed on the 305b list of impaired waters mainly due to impairment by pathogens of unknown sources. Potential sources of bacterial contamination include fecal material from humans via a local sewage treatment plant just upstream from the Reservation, birds from a bird sanctuary near the Reservation, livestock located adjacent to the Reservation, wild birds and animals, other humans including the homeless living on or near the river, and various nonpoint sources from nearby parking lots, streets, and freeways. Although the State Water Board (Board) has updated the Colorado River Basin Plan (Basin Plan) in 1993, and adopted amendments in 2006, this section of the Whitewater River has remained on the California 303(d) List of impaired waters. As with other updates, the current amendment proposal does not provide a timeline for removing the river from the 303(d) list. | The Coachella Valley Stormwater Channel is listed on the 2010 Clean Water Act (CWA) section 303(d) List of Water Quality Limited Segments (List) because it did not meet water quality standards for pathogens. Because the Coachella Valley Stormwater Channel is listed for pathogens, CWA section 303(d) requires the establishment of a total maximum daily load (TMDL). Generally, a TMDL specifies load allocations for nonpoint sources and wasteload allocations for point sources that, when implemented, are expected to result in attainment of applicable water quality standards. The TMDL addresses the pathogen impairment and is designed to ensure that water quality standards will be achieved, and that beneficial uses in the watershed will be protected. The Basin Plan amendment contains implementation actions to achieve the TMDL. The implementation plan is divided into two phases. Phase I concludes 3 years after U.S. |

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| | | | Environmental Protection Agency (U.S. EPA) approval. Phase II will last 7 years and will only occur if Phase I is unsuccessful at achieving the water quality objectives. Therefore, the Colorado River Basin Regional Water Quality Control Board (Colorado River Basin Water Board) expects to achieve water quality objectives within 10 years. Once the Coachella Valley Stormwater Channel is meeting water quality objectives, evaluation of de-listing from the section 303(d) List would occur in accordance with the Water Quality Control Policy For Developing California's Clean Water Act Section 303(d) List (Sept. 2004). |
| 1.2 | | Without so stating, at pages 2 through 10, the Commenter appears to set forth its proposed TMDL language, data, or analysis to be included in the Basin Plan Amendment/TMDL adopted on June 17, 2010 by the Regional Water Quality Control Board, Colorado River Basin Region (Colorado River Basin Water Board). | The Commenter did not present its suggested TMDL language to the Colorado River Basin Water Board. As a result, the Commenter presented no opportunity for the Colorado River Basin Water Board to consider its proposed language. The State Water Board is authorized to review and approve the Basin Plan amendment adopted by the Colorado River Basin Water Board and, without first returning the Basin Plan amendment to the Regional Board for further consideration and resubmission to the State Water Board, the State Water Board is not authorized to revise and adopt a different Basin Plan amendment. State Water Board staff encourages the Commenter to work collaboratively with the Colorado River Basin Water Board regarding |

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| | | | any of its proposed revisions to the Basin Plan amendment or TMDL. |
| 1.3 | Darrell Mike | This section states that because "No significant correlation could be made between the E. coli levels measured in the drain collector discharges and the E. coli levels measured in the CVSC", the overall results of CVAS (Coachella Valley Agricultural Stakeholder Water Quality Task Force) monitoring program "…indicate that bacteria entering the CVSC in flows from subsurface drain collectors serving agricultural lands have only a de minimis effect on the bacterial indicator impairment in the CVSC". Based on this erroneous logic, discharge from VSDWTP would also have minimum effect on the bacterial indicator impairment in the CVSC because as indicated above, there is also no correlation between FIB [Fecal Indicator Bacteria] levels measured from the discharge pipe and the FIB levels measured in the Whitewater River. | Four hundred fifty water samples were collected from five representative subsurface drain collectors at receiving water locations upstream from the collectors, and at receiving water locations downstream from the collectors. The overall results of this monitoring program indicated that bacteria entering the Coachella Valley Stormwater Channel in flows from subsurface drain collectors serving agricultural lands have only a de minimis effect on the bacterial indicator impairment in the Coachella Valley Stormwater Channel. Out of one hundred fifty samples collected from the drain collectors, four exceeded the 400 MPN/100 ml Instantaneous Maximum E. coli water quality objective. None of the ninety 30-day geometric means calculated for E. coli exceeded the Basin Plan water quality objective of 126 MPN/100 ml. The Colorado River Basin Water Board concluded that the overall results of this monitoring program indicated that bacteria entering the Coachella Valley Stormwater Channel in flows from subsurface drain collectors serving agricultural lands have only a de minimis effect on the bacterial indicator impairment in the Coachella Valley Stormwater Channel and therefore, exempted Agricultural Dischargers from having to complete Phase I monitoring actions regarding agricultural |

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| | | | discharges. State Water Board staff is unclear how 'erroneous logic' was used to determine that agricultural discharges are not contributing to an exceedance of the water quality objectives based on the monitoring results.<br><br>The discharge from the Valley Sanitary District Wastewater Treatment Plant (Plant) is permitted under a National Pollutant Discharge Elimination System (NPDES) permit. Hence, the Plant must be assigned a wasteload allocation under federal law; otherwise, its discharge would be prohibited. The Plant's NPDES permit contains bacterial indicator effluent limits for both fecal coliform and E. coli. The numeric effluent limits in the Plant's permit for E. coli are equal to the wasteload allocations assigned to the Plant for E. coli in this TMDL.<br><br>Also, please see response to comment 1.2. |
| 1.4 | Darrell Mike | The Board should consider implementing more state-of-the-art methodology for tracking sources of fecal pollution.<br><br>The Board should consider including an anaerobic FIB in its monitoring program. At the last annual ASM meeting, Hawaii reported the importance of using anaerobic FIB in their warm and tropical climate. They have studied the feasibility of including anaerobic *Clostridium* in their State water quality monitoring programs. In support of this strategy, we have demonstrated that anaerobic *Bacteroides* is a useful year-round FIB in our warm and hot valley and will continue to | State Water Board staff note that this issue was not raised with the Colorado River Basin Water Board by the Commenter, the Twenty-Nine Palms Band of Mission Indians Tribe. Therefore, the Colorado River Basin Water Board did not have the opportunity to consider it. The State Water Board does not have the authority to make changes to the amendment. Therefore, in order to accommodate the changes requested, the State Water Board would need to return the amendment to the |

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| | | monitor fecal pollution of the Whitewater River using both traditional and state-of the- art methodologies. | Colorado River Basin Water Board for further consideration and resubmission to the State Water Board. Although State Water Board staff supports consideration of an anaerobic fecal indicator in its monitoring program, staff does not recommend a remand. State Water Board staff urges the commenter to continue working with the Colorado River Basin Water Board staff to examine the feasibility of such an indicator bacteria. However, State Water Board staff defers to the Colorado River Basin Water Board's judgment on the feasibility or necessity to include any additional fecal indictor bacteria in the monitoring program.<br><br>Also, please see response to comment 1.2. |
| 1.5 | Darrell Mike | What is BU? Please define all acronyms. | The initialization "BU" stands for "beneficial uses". The initialization is defined in "Table H-1" on page 1 of the amendment language under the "Project Definition" element of the Table. |
| 1.6 | Darrell Mike | Because bacterial loading of the Whitewater River is not only from point and non-point pollution sources, the calculation of loading capacity should also take into account of non-polluting sources. This would be especially important for calculating LAs.<br><br>The board should consider **not** establishing TMDL based only on *E. coli*. Not all FIB exhibit the same temporal and spatial trends along the Whitewater River. In the stretch of the river that we have monitored monthly for over 2 years, we have found no correlation between levels fecal coliform, | The TMDL includes all point and nonpoint sources of E. coli in calculating the load and wasteload allocations. U.S. EPA recommends E. coli as the best indicator of health risk from water contact in fresh water recreational waters. While it may be preferable to include monitoring for multiple fecal indicator bacteria, it may not be feasible or necessary. State Water Board staff urges the commenter to continue working with the Colorado River Basin Water Board staff |

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| | | enterococcus, and bacteroides in discharged wastewater and water quality at sites located downstream. Furthermore, our monitoring data suggest that most if not all of the water in the Tribal section of the Whitewater River most likely originated from the VSDWTP point source. | during Phase I of the implementation plan in monitoring and addressing bacterial indicators.<br><br>Also, please see responses to comments 1.2 and 1.4. |
| 1.7 | Darrell Mike | • Any monitoring plan should include more than *E. coli*.<br>• Any monitoring plan should include at least one anaerobic indicator of fecal pollution.<br>• All monitoring plans should be made available to the public for review.<br>• All monitoring plans should contain a State and/or U.S. EPA approved quality assurance project plan (QAPP). | Please see responses to comments 1.4 and 1.6. Monitoring Programs will be available for viewing upon request. Quality Assurance Project Plans (QAPPs) are required to be developed and submitted to the Colorado River Basin Water Board Executive Officer for review and approval as part of the implementation of Phase II. |
| 1.8 | Darrell Mike | Farmers and the CVWD **should not** be specifically exempted from having to complete Phase I monitoring actions regarding agricultural discharges. In our opinion, the monitoring completed by CVAS in 2008-2009 did not accurately and fully characterize the contribution of irrigated agriculture to the bacterial indicator impairment in the CVSC based on many of the reasons that we presented above. | Please see responses to comments 1.2 and 1.3. |
| 1.9 | Darrell Mike | The proposed Phase I actions should have been completed by now. This is especially true since the strategy for monitoring FIB has not changed since the very first Basin Plan. No new incite *[sic]* would be gained by continuing to use this outdated strategy. Phase II implementation actions should be initiated now, not three years from now. | The Colorado River Basin Water Board looked at an accelerated timeframe as one alternative and found it was not feasible or reasonable, considering the amount of data collection required to assess conditions/sources and the amount of time needed by responsible parties to develop/implement plans to reduce pathogen levels. |

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| | | | Also, please see response to comment 1.2. |
| 1.10 | Darrell Mike | • Monitoring data should be shared with Tribes.<br>• Tribes need to be consulted with on a government to government basis.<br>• The board should also require written reports from any discharger.<br>• Reports submitted to the board should be accessible to Tribes. | State Water Board staff agrees that the data should be shared with Tribes and is unaware of any policy that would inhibit the sharing of monitoring data.<br><br>State Water Board staff have reviewed the administrative record and found that the Colorado River Basin Water Board has been involved in communications with the Twenty-Nine Palms Band of Mission Indians Tribe.<br><br>The Colorado River Basin Water Board is requiring all dischargers listed in Table H-2 of the Basin Plan amendment language to develop and submit as a whole, or in groups, a comprehensive water quality monitoring program for the Coachella Valley Stormwater Channel to the Colorado River Basin Water Board Executive Officer for review and approval 90 days after U.S. EPA approves the TMDL. The monitoring plan will include a sufficient number of monitoring stations and monitoring events to adequately address all potential sources of bacteria.<br><br>State Water Board staff agrees that the submitted reports should be accessible to the tribes and is unaware of any policy that would inhibit the sharing of such reports. |

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| | | | Also, please see response to comment 1.2. |
| 1.11 | Darrell Mike | One or more anaerobic FIB should be included in the new monitoring strategy. | Please see responses to comments 1.2 and 1.3. |
| 1.12 | Darrell Mike | It is not clear who will be doing this, but any monitoring, tracking, and survey data should be made available to Tribes upon request. | State Water Board staff agrees that this data should be available upon request and have no indication that it will not.<br><br>Also, please see response to comment 1.2. |
| 1.13 | Darrell Mike | Any BMPs and/or mitigation plans would fail if:<br>1. the contribution of bacterial regrowth and colonization is not taken into account; and<br>2. A reliable MST is not developed and Implemented. | The contribution from re-growth has been taken into account in the TMDL and ribotype-based Microbial Source Tracking was used in the development of the TMDL. In addition, if Phase I monitoring results do not identify sources of bacteria indicator pollution, a DNA study to characterize human-controlled contributions and a bacteria re-growth study may be conducted during Phase II of TMDL implementation.<br><br>Also, please see response to comment 1.2. |
| 2.1 | G. Scott McGowen | Caltrans submitted a comment letter to the Colorado River Basin Regional Water Quality Control Board (Colorado Regional Board) on June 3, 2010, that requested several changes to the TMDL. The comments were not addressed by the Colorado Regional Board. The Colorado Regional Board did not release a Response to Comments document with the reasons that the comments were rejected. The notice of the opportunity for comments released on April 20, 2010 by the Regional Board stated that only comments that were related to | Prior to the adoption of the Coachella Valley Stormwater Channel bacterial indicator Basin Plan amendment, the Colorado River Basin Water Board solicited comments on the proposed TMDL and Basin Plan amendment. The California Department of Transportation submitted comments on April 30, 2007. The Colorado River Basin Water Board responded to those comments in a letter dated May 14, |

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| | | four proposed revisions to the amendment language at the time would be considered. | 2007. On May 16, 2007, the Colorado River Basin Water Board adopted Resolution No. R7-2007-0039 amending the Basin Plan to establish a TMDL and implementation plan for bacterial indicators in the Coachella Valley Stormwater Channel. On January 18, 2008, the Colorado River Basin Water Board's Executive Officer requested that the Coachella Valley Stormwater Channel bacterial indicators TMDL be withdrawn from State Water Board consideration for approval, based on comments received from affected stakeholders and to allow Coachella Valley agricultural stakeholders to conduct an early implementation monitoring program. The overall results of this early implementation monitoring program indicated that bacterial indicators entering the Coachella Valley Stormwater Channel in flows from subsurface drain collectors serving agricultural lands have only de minimis effect on the bacterial indicator impairment in the Coachella Valley Stormwater Channel. As a result, the amendment was then revised to be consistent with the monitoring results. The Colorado River Basin Water Board then solicited comments exclusive to the proposed revisions of the amendment. The California Department of Transportation submitted comments on June 3, 2010, several of which were beyond the scope of consideration. The Colorado River Basin Water Board responded to those comments pertaining to the proposed revisions in a letter |

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| | | | dated June 14, 2010. The proposed revisions were then adopted by the Colorado River Basin Water Board on June 17, 2010, by Resolution No. R7-2010-0028. |
| 2.2 | G. Scott McGowen | The requirements in this TMDL for Caltrans are not consistent with those of TMDLs for the same pollutant in other regions of the state. For example, the TMDL technical report for Bacterial Indicators in Richardson Bay states that "we [San Francisco Regional Water Quality Control Board] believe that the source of bacteria in highway runoff is wildlife" and that "the Water Board will not hold discharging entities responsible for uncontrollable coliform discharges originating from wildlife/natural background sources." Other TMDLs for bacterial indicators where the requirements for Caltrans are different include TMDLs for Bacterial Indicators in San Lorenzo River Watershed (Central Coast Region), Los Angeles River (Los Angeles Region), and the San Diego Beaches and Creeks Project I TMDL. Caltrans is required to maintain a statewide storm water program approach for transportation throughout the state. Development of a consistent program was the direction from the Environmental Protection Agency's (EPA's) Findings of Violation and Order for Compliance (EPA Docket No. CWA-09-201l-0001) Section lII.A.1-3 (Administrative Order). Varying requirements for bacteria TMDLs from the same land use type (highway transportation) restricts Caltrans' ability to use a comprehensive statewide approach. Caltrans requests that the TMDL have consistent requirements for bacterial indicator TMDLs for Caltrans throughout the state. The approach taken by the San Francisco Regional Board should be applied for bacterial indicator TMDLs, as it recognizes that sources of bacterial indicators from Caltrans | State Water Board staff agrees with the commenter that consistent requirements would be ideal for them. However, the Colorado River Basin Water Board has selected the appropriate requirements necessary to collect the amount of data required to assess conditions/sources in the Coachella Valley Stormwater Channel.<br><br>The appropriate time to have submitted comments regarding the approach taken by the Colorado River Basin Water Board for this Basin Plan amendment was prior to its May 16, 2007 adoption. State Water Board staff notes that these issues in this comment were not raised at that time to the Colorado River Basin Water Board by the California Department of Transportation. Therefore, the Colorado River Basin Water Board did not have the opportunity to consider them. The State Water Board does not have the authority to make changes to the amendment. Therefore, in order to accommodate the changes requested, the State Water Board would need to return the amendment to the Colorado River Basin Water Board for further consideration and resubmission to the State Water Board. Although State Water Board staff would like to |

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| | | roadways originate from wildlife/natural background sources. | have consistent requirements throughout the regions where possible, staff does not recommend a remand of the amendment, considering the fact that the Colorado River Basin Water Board was not given the opportunity to consider these comments, and that, although not ideal, moving forward with the TMDL is preferential to the alternative. State Water Board staff urges the California Department of Transportation to continue to work with the Colorado River Basin Water Board and its staff. The Colorado River Basin Water Board has committed to reevaluate the TMDL at several intervals. Additionally, the Colorado River Basin Water Board has the authority to reexamine the TMDL at any time. |
| 2.3 | G. Scott McGowen | The June 3, 2010 letter submitted by Caltrans included our concern about the extent of the watershed included. The Regional Board did not respond to our concern. The impaired section of the CVSC as defined by the 2006 303(d) List and included in the BPA is the 17-miles of the channel extending south from Indio to the Salton Sea. The BPA assigns waste load allocations to only three point source entities, Caltrans, the City of Coachella, and the Kent Sea Tech Corporation Fish Farm (KSCFF), although there are other municipal separate storm sewer system (MS4) permittees in the greater CVSC watershed. In the CVSC watershed, Caltrans primarily drains to other MS4 facilities or pervious areas, not directly to water bodies. It is our understanding that the only Caltrans MS4 facilities included in the TMDL are those located within the boundaries of the City of Coachella. This area is shown in | The administrative record shows that the Colorado River Basin Water Board responded by letter, dated June 14, 2010, to the California Department of Transportation's June 3, 2010 comment letter it submitted.<br><br>Regarding the extent of the watershed included in the TMDL, the "Calculations and Allocations Section" in the Basin Plan amendment assigns waste load allocations to all point sources and load allocations to all nonpoint sources throughout the entire stretch of the impaired section of the Coachella Valley Stormwater Channel year-round. Accordingly, all Caltrans facilities that discharge into the watershed of the |

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| | | Figure 1. In addition, we understand that Caltrans facilities outside of the City are not covered by this TMDL. Please verify our understanding of the extent of the watershed included in the TMDL. | impaired section are included in the TMDL, regardless of whether those facilities are located inside or outside of the boundaries of the City of Coachella.<br><br>Also, please see response to comment 2.1. |
| 2.4 | G. Scott McGowen | Caltrans' existing program already meets dry weather flows, and has insignificant dry weather discharge potential. Therefore, we request to be exempted from implementation and monitoring during dry weather conditions. | Please see responses to comments 2.1 and 2.2. |
| 2.5 | G. Scott McGowen | Discharges from Caltrans roadways located in the CVSC watershed are from natural background sources. Caltrans requests that the waste load allocations assigned to Caltrans in the TMDL be set equal to existing loads or that Caltrans be removed as a stakeholder in this TMDL. | The California Department of Transportation is assigned a wasteload allocation equal to the numeric target necessary to attain water quality objectives protective of the most sensitive beneficial uses to pathogen impairment.<br><br>Also, please see responses to comments 2.1 and 2.2. |
| 2.6 | G. Scott McGowen | The U.S. EPA is currently conducting a review of bacterial indicators and will release new recommendations in 2012. The TMDL should include a requirement for the Regional Board to review the bacterial indicators included in this TMDL once the U.S. EPA recommendations are released. | The Colorado River Basin Water Board has committed to review the TMDL every three years with the first review beginning two years after approval of the TMDL by the U.S. EPA.<br><br>Please see responses to comments 2.1 and 2.2. |
| 2.7 | G. Scott McGowen | The high flow suspension is appropriate since contact recreation activities are not safe during high flow conditions. In addition, recreational uses are prohibited in the CVSC, usage rates of the channel are expected to be low, and activities in | Although recreation in the stormwater channel is unauthorized by the Coachella Valley Water District, people frequently recreate in and around the stormwater channel. The Coachella |

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| | | the channel are more characteristic of non-contact recreation. As a result, the high flow suspension should be incorporated into the TMDL and BPA.<br><br>Please include a discussion of the status of this issue and how it would be integrated into the TMDL requirements. This issue would have a significant impact on this TMDL and the requirements for compliance, and it should be considered before the TMDL is approved and implementation is required. | Valley Stormwater Channel is currently assigned the beneficial use of Water Contact Recreation, and that use must be protected. A high flow suspension may be appropriate, but it is outside the scope of this TMDL, and State Water Board staff defers to the Colorado River Basin Water Board on the appropriateness of its use. The Colorado River Basin Water Board may pursue this issue at a later date, but it is not currently included as part of this amendment. State Water Board staff does not have information on the status of this issue and urges the California Department of Transportation to contact the Colorado River Basin Water Board to receive further information regarding this issue. State Water Board staff disagrees that a discussion of this issue is necessary prior to consideration of the TMDL.<br><br>Also, please see responses to comments 2.1 and 2.2. |
| 3.1 | Steve Bigley | 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 <u>from anthropogenic activities continue to cause the exceedances of the water quality objectives and that these exceedances</u> [emphasis added] persist despite recommended operation and maintenance procedures and control measures in their existing | State Water Board staff thanks the commenter for this correction. However, the commenter's proposed revised language is currently in the Basin Plan amendment language and therefore, no additional correction of this Agenda item is necessary. |

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| | | 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:<br><br>"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." | |
| 3.2 | Steve Bigley | 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. | State Water Board staff appreciates the support of the Coachella Valley Water District. |
| 4.1 | Jason E. Uhley | District staff would like to take this opportunity to express its support for the comments submitted by Coachella Valley Water District (CVWD) on the Basin Plan Amendment for the Coachella Valley Stormwater Channel (CVSC) Bacterial Indicators Total Maximum Daily Load (TMDL). As noted in comments provided by CVWD, please revise the second paragraph of the staff report discussion on Implementation to read: | State Water Board staff thanks the commenter for his correction. However, commenter's proposed revised language is currently in the Basin Plan amendment language and therefore, no additional correction of this Agenda item is necessary.<br><br>State Water Board staff appreciates the support |

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| | | "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."<br><br>Other than this minor change of text, the District supports the approval of the draft State Water Resources Control Board Resolution approving amendments to the Basin Plan adopted under the Colorado River Basin Water Board Resolution Nos. R7-2007-0039 and R7-20 I0-0028. | of the Riverside County Flood Control and Water Conservation District. |