

**COMMENT RESPONSE FORM**

Client:	City of Chico
Project:	Chico SWRP
Submittal:	Water Quality Tech Memo
Prepared By:	Natalie Muradian
Date:	8/7/2017



ID	REVIEWER	COMMENT	WEST YOST RESPONSE	Action
1	Susan Mason	On page 4, Table 2 implies that Comanche Creek is somehow connected to Little Chico Creek. Although there is a diversion from LCC into Butte Creek and a diversion from Butte Creek into CC, the CC diversion from Butte Creek is upstream of the confluence of the LCC bypass into Butte Creek so there is no connection between LCC and CC.	The wording in Table 2 on page 4 is directly from the state's 303(d) list. So the state might not be aware that Comanche Creek does not connect to Little Chico Creek. To remain consistent with the state's documents, we will retain this wording. We can provide a clarifying footnote in the table.	Complied with comment
2	Susan Mason	As you probably know from reading the LCC Existing Conditions Report, LCC does not currently connect to the Sacramento River, although it may have done so in the past.	We are aware of this, thank you for clarifying.	No change necessary
3	Susan Mason	Although in theory stormwater pollutants settle out in Teichert Ponds and are not introduced into LCC via the TP outlet, has this outlet water ever been tested? By all accounts, the TP sediments are heavily polluted and in major storm events, it seems unlikely that there's enough time for all of the pollutants to settle out before the water enters LCC.	We will take this into consideration when evaluating any projects related to Teichert Ponds.	No change necessary
4	Ryan Teubert	Better define these [beneficial uses] terms, seems like they were pulled off a list but might not be common to non experts. What kind of habitat, salmonid or aquatic/terrestrial species. Irritation - Domestic vs agricultural. Migration/spawning-may want to list species.	These terms come from the Central Valley Basin Plan. We can provide the definitions from the Basin Plan.	Complied with comment
5	Ryan Teubert	Is there any expectation that these streams could be used for potable use in the future?	The 2015 California Water Service Urban Water Management Plan does not list surface water from creeks within the watershed as a future water potable supply. We can add a sentence clarifying this.	Complied with comment
6	Ryan Teubert	Editorial comments - see Ryan's markups.	These minor edits will be addressed as needed.	Complied with comment
7	Ryan Teubert	Is an increased water temperature a concern in the Mounains and Foothll Zones?	The Little Chico Creek Existing Conditions Report states that water temperatures increase in the Mountain and Foothill Zones during summer, but does not exceed specific basin objectives or water quality standards. The Big Chico Creek Existing Conditions Report did not include water temperature as a topic of concern.	No change necessary
8	Ryan Teubert	When was the mine closed?	The date of closure is unclear from the Big Chico Creek Existing Conditions Report, but the closure was prior to 1998. We can add a sentence clarifying this.	Complied with comment
9	Ryan Teubert	Are there any studies that back up City Staff speculation on elevated levels of mercury in fish? With all the work on the Sacramento River and its tributaries there would be [studies], otherwise consider removing this statement. What are the qualifications of the City Staff that are speculating this?	This sentence will be deleted.	Complied with comment
10	BEC	<b>Water Quality Issues</b> Expanding on the impacts of trash on our creeks and communities will provide a more complete picture of the water quality impacts of trash in waterways. Trash in creeks introduces pollutants, degrades habitats, and impacts our community member's recreational experiences. Green waste dumping creates excess nutrients that can create algae blooms which eventually die and remove dissolved oxygen from the water, which many aquatic life forms depend on. Other items such as old appliances, paint cans, batteries, fuel, waste oil, and other household hazardous wastes such as pesticides, wood preservatives and solvents add pollutants to our creek.	We can add the text you provided "Trash in creeks introduces pollutants, degrades habitats, and impacts our community member's recreational experiences. Green waste dumping creates excess nutrients that can create algae blooms which eventually die and remove dissolved oxygen from the water, which many aquatic life forms depend on. Other items such as old appliances, paint cans, batteries, fuel, waste oil, and other household hazardous wastes such as pesticides, wood preservatives and solvents add pollutants to creeks."	Complied with comment
11	BEC	<b>Water Quality Issues</b> The use of the word "can" in this section creates a lack of clarity about the negative impacts of all identified water quality issues. (For example: on page 6 it is stated that "Metals, pesticides, and toxicity all negatively impact habitat and migration/spawning." and in the next paragraph, "Pesticides can negatively impact aquatic habitat.") Removal of the word "can" in this section would make it clear that these water quality issues harm aquatic habitats. While the identified activities can/may create water quality issues, it is clear that increase sedimentation, pollution, and water temperatures all negatively impact aquatic habitats.	We will take out the word "can" and will clarify that constituents in the water negatively impact habitat.	Complied with comment

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12	BEC	<b>Potential Sources of Sedimentation</b> Recreational activities in the upper watershed contribute to erosion and increased sediment in waterways. Erosion from hiking, biking, disk golfing and other uses result in sediment that is flushed in to our waterways during rainfall. Recreation in the lower watershed similarly contributes to erosion and increased sediment in waterways as well as increased bacteria and trash.	We can add a modification of the text you provided: "Recreational activities in the upper and lower watersheds, such as hiking, biking, disk golfing and other uses, may result in small amounts of sediment to the waterways during rainfall.	Complied with comment
13	BEC	<b>Potential Sources of Trash</b> Specifying the urban sources of trash in creeks may help identify and prioritize projects and illuminate this complex issue. According to the United States Environmental Protection Agency, sources may include "litter from cars & trucks, including garbage trucks and uncovered truck beds (especially near freeway on-ramps); illegal dumping and homeless encampments near waterways; litter from garbage and recycling bins caused by spills on collection day, overflowing/uncovered bins, and scavenging; pedestrian litter near transit stops/stations, outdoor events, and near fast food or convenience stores." <a href="https://www.epa.gov/trash-free-waters/clean-water-act-and-trash-free-waters">https://www.epa.gov/trash-free-waters/clean-water-act-and-trash-free-waters</a>	We can add the text you provided. "According to the United States Environmental Protection Agency, sources may include "litter from cars & trucks, including garbage trucks and uncovered truck beds (especially near freeway on-ramps); illegal dumping and homeless encampments near waterways; litter from garbage and recycling bins caused by spills on collection day, overflowing/uncovered bins, and scavenging; pedestrian litter near transit stops/stations, outdoor events, and near fast food or convenience stores." We will add website to references.	Complied with comment
14	BEC	<b>Potential Sources of Water Temperature Increase</b> Identifying climate change as a cause of increasingly high ambient temperatures, and the likely continued increase in temperatures will help steer project planning to consider climate change and it's future impacts on water temperatures creating future stability for local aquatic habitats. Increased sedimentation can also contribute to higher water temperatures. <a href="https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprd1187281.pdf">https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprd1187281.pdf</a>	We can add that climate change is likely a source of increasing ambient temperatures which contributes to an increase in water temperatures.  We can add that increased sedimentation can also contribute to higher water temps.  Greenhouse gasses and water temperature are part of the Environment Benefit evaluation criteria.	Complied with comment
15	BEC	<b>Strategies and Projects to Address Water Quality Issues</b> Bacteria - Swimming activities in Sycamore pool are known to be a source of increased levels of bacteria. Education and outreach to reduce the impacts from swimming in the creeks, and further studies would complement projects aimed at reducing urban runoff.  Education and Outreach are core to creating lasting change in our community. Knowledgeable citizens and businesses are empowered to reduce their impacts. Education and outreach also engages communities in opportunities for collective action and the process of planning for the future of storm water management in their community. For this reason, education and outreach should be included in strategies for each of the identified water quality issues.  Effectiveness monitoring should also be included in the strategies to address the identified water quality issues. Monitoring impacts and results from projects will allow for ongoing evaluation, adjustment, and creation of our communities storm water management plan.	We can add education and outreach to reduce impacts from swimming in creeks, and further studies regarding sources of bacteria in creeks.  We can add education and outreach as a strategy to address each issue.  We can add effectiveness monitoring as a strategy to address each issue.	Complied with comment
16	Erick Burres	While I do understand that this was just a technical memo, it would be very beneficial for it to include hyperlinks and or websites to information pertinent to its content, such as TMDLs, post construction plans, monitoring plans, etc. especially for WATER QUALITY ISSUES and ACTIVITIES THAT POTENTIALLY CONTRIBUTE TO WATER QUALITY ISSUES.	We will update our references to include hyperlinks for the TMDL websites and the all of the SWRCB orders, the post construction plans, and whatever is referenced in the report that's also available online.	Complied with comment
17	Erick Burres	Table 1 – Additional Beneficial Uses such as Cultural and Subsistence (FISH) are forthcoming of have been adopted for your Region. Updating this table is suggested.	We will add a sentence that future beneficial uses may be applicable.	Complied with comment

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18	Erick Burres	Regulatory Setting and ACTIVITIES THAT POTENTIALLY CONTRIBUTE TO WATER QUALITY ISSUES– Storm Water Monitoring data trends and summaries would be most helpful. Maps of pollution hotspots would also be very beneficial.	Monitoring data trends and pollution hot spots are not available.  We already briefly summarize data trends on temperature from the Stream Team reports.	No change necessary
19	Erick Burres	Table 2 and 3 – Please include dates of TMDL implementation. Addressing potential additions or deletions of waters from the 303(d) list would be most acceptable. A link to where we could observe trend data would be nice.	"Expected TMDL completion Date" was included because the TMDL has not yet been adopted or developed, and therefore is not implemented. That is the wording the State used. We can change "completion" to "Adoption"  We include all the potential additions, but will not include what has been removed from the list.  Trend data does not appear to be available for priority pollutants in this PAW.	Complied with comment
20	Erick Burres	CVRWQCB Monitoring and Reporting Program Order R5-2002-0192, Sycamore Pool Operations – Where is the monitoring plan and turbidity mitigation plan? I could not locate these online. These would be useful as there is no statewide SOP for monitoring FIB's in freshwaters that support REC 1.	Here is the link to the WDR order: <a href="http://www.waterboards.ca.gov/rwqcb5/board_decisions/adopted_orders/butte/r5-2002-0192.pdf">http://www.waterboards.ca.gov/rwqcb5/board_decisions/adopted_orders/butte/r5-2002-0192.pdf</a>	City will provide plan, if available.
21	Erick Burres	City of Chico Post-Construction Standards Plan- This is a nice document. It could be updated to include useful websites that were not included; <a href="http://nemonet.uconn.edu/">http://nemonet.uconn.edu/</a> and others	Updating the Post-Construction Standards Plan is out of scope for this project. The City will consider including the links as references on the website or in their next update of the Post-Construction Standards.	No change necessary
22	Erick Burres	Table 4 – Is Land conversion, urbanization, impacting the PAW?	Yes land conversion/urbanization can impact the PAW. We already included land conversion/urbanization under both Urban Development and Construction Activities, in Table 4.	No change necessary
23	Erick Burres	Potential Sources of Mercury – Consider updating this section as it relates to the new SWRCB mercury limits	The statewide mercury limits have not been set for our PAW. I will add a sentence that we will need to be aware of such a plan for the future.	Complied with comment
24	Erick Burres	ACTIVITIES THAT POTENTIALLY CONTRIBUTE TO WATER QUALITY ISSUES and STRATEGIES AND PROJECTS TO ADDRESS WATER QUALITY ISSUES – Are there any studies, ongoing or proposed, to investigate potential source identification of pollutants mentioned. Please include.	The City has a monitoring plan to monitor the effectiveness of several recent LID projects. The City does not have studies to investigate potential sources of pollutants.	No change necessary
25	Erick Burres	Table 5 and other areas of this summary may serve as project proposal subjects for prioritization and weighting.	Many of the projects submitted so far address water quality issues summarized in Table 5.	No change necessary