

## Attachment C

### California Department of Corrections and Rehabilitation Mule Creek State Prison Enhanced Compliance Action (ECA) Scope of Work

**Project Name:**

Mule Creek State Prison, Storm Water Microbiological Study

**Project Developed by:**

California Department of Corrections and Rehabilitation (CDCR)

**Project to be Performed by:**

California Department of Corrections and Rehabilitation

**Contact:**

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**Description of Project:**

The purpose of this ECA is to characterize the microbiological quality of the Mule Creek State Prison (MCSP) storm water collection system discharges and any effects these discharges have on Mule Creek water quality.

**ECA Goals:**

1. Characterize the microbiological quality of storm water discharges from the Mule Creek State Prison storm water system.
2. Determine the effects to Mule Creek of MCSP storm water system discharges

## Compliance with ECA Criteria

### 1. Benefit to Water Quality and Beneficial Uses

This ECA is an environmental quality assessment of the impact of MCSP storm water discharges to Mule Creek, and will allow for the appropriate address of issues identified.

### 2. ECA is not an Obligation of Discharger

The CDCR is not required to develop, implement, or fund the proposed ECA by any permit, order, or local, state, or federal law.

### 3. No Fiscal Benefit to Regional Water Quality Control Board

This ECA does not provide any fiscal benefit to the RWQCB, or fund any functions, members, or staff of the RWQCB.

### 4. Nexus between Violation and ECA

A nexus exists between the MCSP non-storm water flows and the proposed ECA. The Storm Water Microbiological Study will aid in defining the impact of MCSP storm water system discharge to Mule Creek.

### 5. Key Personnel Involved in ECA

The CDCR's Facility Planning, Construction and Management Division will oversee completion of the ECA.

### 6. Project Milestones and Budget

The overall project cost is at least a minimum of \$400,000. This project is planned to be funded utilizing the Department's Special Repair budget allocation. The ECA will address the following three questions through the completion of tasks addressing each. The nature of the study necessitates concurrent performance of tasks.

Question 1: What is the microbial water quality of storm water effluent from Mule Creek prison and to what extent do they influence water quality in the creek?

Task 1: Compare E. coli concentrations upstream and downstream of Mule Creek State Prison.

Task 2: Compare mass loadings at four locations.

Question 2: What fecal sources are part of any prison contribution?

Task 1: Investigate human sources within prison grounds

Task 2: Investigate avian sources within prison grounds

Task 3: Closed circuit television investigation

Question 3: What other fecal sources are contributing to creek exceedances of microbial water quality criteria?

Task 1: Investigate cattle sources to Mule Creek, upstream of prison grounds

## REFERENCE SETTLEMENT or ENFORCEMENT ACTION #?

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Task 2: Investigate human sources to Mule Creek, upstream of prison grounds

Task 3: Investigate avian sources to Mule Creek, upstream of prison grounds

Task 4: Investigate contributions from treated effluent spray fields to Mule Creek

### **Schedule for Completing ECA**

Tasks will be performed concurrently and rely on analytical data that will come from sampling at multiple locations to represent conditions during wet and dry seasons. The study is estimated to require 30 months for completion.

### **Reports to the Regional Water Quality Control Board**

The CDCR intends to comply with quarterly reporting requirements associated with an ECA with a duration of greater than one year. The CDCR will also submit a final quarterly report as required upon completion of the ECA.

### **Project Compliance with CEQA**

The ECA does not require CEQA requirements.