

# SAN JOAQUIN VALLEY DRAINAGE AUTHORITY

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March 16, 2009

Danny McClure  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun center Dr., #200  
Rancho Cordova, CA 95670

Subject: Proposed Revisions to the 303(d) List of Impaired Water Bodies

Dear Danny,

I am writing as Watershed Coordinator for the Westside San Joaquin River Watershed Coalition formed under the Irrigated Lands Regulatory Program (ILRP).

I am following up on my earlier letter with supplemental comments that relate to the monitoring sites for the ILRP. The Westside Coalition has implemented a monitoring program to identify any issues that are present within our coalition. As I mentioned in my earlier comment letter we have an approved Management Plan for these sites. It is unfortunate that in many cases the monitoring information we are gathering as part of our program is now being used to add these sites to the 303d list, complicating the regulatory process just as we work to obtain water quality benefits by implementing our Management Plan.

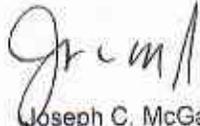
In addition many of the parameters that are being added are not water quality objectives in the Basin Plan. The Technical Committee of the ILRP is engaged in reviewing determinations of these "non-basin plan objectives". It appears inappropriate to list constituents that are not adopted objectives in the Basin Plan, especially in light of the fact that ongoing review of these numbers is taking place. We would request that these constituents be removed from the proposed 303d listing until further review and/or adoption into the Basin Plan has taken place. This would give our coalition time to deal with the issues without using our efforts against us in adding new requirements at this early stage.

An additional comment, the listing for Panoche Creek inappropriately lists the potential source for sedimentation/siltation and selenium as agriculture and agriculture-grazing. Panoche Creek is a highly erodible watershed on the Westside of the San Joaquin Valley. In fact it is the source of much of the alluvium in the valley, deposited long before any agricultural activities. Selenium is a natural constituent present in the coastal range foothills and is present in Panoche Creek through natural erosion processes in the watershed upstream of any agriculture activities. A more accurate explanation of the source would be natural erosion processes.

If you have any questions I can be contacted directly at:

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887 N. Irwin St.  
P. O. Box 1122  
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Phone: 559-582-9237  
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Very truly yours,

A handwritten signature in black ink, appearing to read "J. McGahan". The signature is written in a cursive, flowing style.

Joseph C. McGahan  
Watershed Coordinator  
Westside San Joaquin River Watershed Coalition