



May 3, 2007

Mr. Joe Karkoski  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

**Re: Comments on Basin Plan Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Diazinon and Chlorpyrifos Runoff into the Sacramento and Feather Rivers**

Dear Mr. Karkoski:

The Sacramento Valley Water Quality Coalition (Coalition) reviewed the *Basin Plan Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Diazinon and Chlorpyrifos Runoff into the Sacramento and Feather Rivers* and is providing the following comments:

- (1) The Coalition does not believe that a Chlorpyrifos Total Maximum Daily Load (TMDL) is necessary at this time as our monitoring results have shown no exceedances.

In response to the Sacramento and Feather Rivers TMDL for Diazinon, and as part of the Coalition's commitment to address water quality issues, the Coalition is implementing the *Diazinon Runoff Management Plan for Orchard Growers in the Sacramento Valley (Plan)*. The Coalition has been conducting monitoring for Diazinon since 2005. When analyzing water samples for compliance with the Plan, Chlorpyrifos is among the suite of constituents monitored. All water samples for Diazinon and Chlorpyrifos were below the criteria or not detected.

- (2) The Coalition urges the Board to limit the scope of monitoring required by the proposed Basin Plan Amendment.

The Coalition is currently monitoring 22 sites for Diazinon and Chlorpyrifos (as well as toxicity to sensitive aquatic species) on tributaries to the Sacramento and Feather Rivers, nearly all of which are below major dams. It is the Coalition's position that the tributary monitoring being conducted by the Coalition for compliance with the Irrigated Lands Program (ILP) will provide more than adequate compliance monitoring for the TMDL, and the Basin Plan Amendment should not require any additional monitoring beyond that being conducted by the Coalition. Furthermore, the staff report and amendments do not provide any specific information regarding the required number of monitoring sites, or the required frequency and methods of monitoring. The Coalition recommends the monitoring requirements be revised to clarify that the required monitoring for the TMDL is being adequately addressed by the current monitoring program under the ILP.

Sincerely yours,

David J. Guy

cc. Pamela Creedon, Executive Officer  
Bill Croyle, Irrigated Lands Conditional Waiver Program Manager