



October 20, 2006

Song Hur, Clerk to the Board
State Water Resource Control Board
1001 I St.
Sacramento, Ca 95814



Subject: Comment Letter 2006 Federal Clean Water Act Section 303D List

I previously commented by letter of January 30, 2006 (141 on your list of commenters).

You responded to comment 131.60 on page 122 that Salt Slough upstream of the San Joaquin River should not be listed. Because of the Grassland Bypass Project selenium standards are met in Salt Slough. Therefore, we agree with that determination.

The Bureau of Reclamation commented (comment 56.3, page 110) that the analysis was performed using a model that did not accurately reflect the basin and recommends use of CALSIM II, the model of choice for both Reclamation and DWR. Regional Board Staff has rejected that recommendation. Staff has not, however, addressed the issue that the model used by the Regional Board does not contain accurate information. For example, a significant reduction in salt loading from the 97,000 acres comprising the Grassland Drainage Area has occurred since 1996. Rejecting the model (CALSIM II) that incorporates that data based on the purported deficiency of the modeling continues an inaccurate portrait of the true salinity values in the San Joaquin River at present and over the past 10 years. This rejection skews the analysis toward higher salinity values which over predicts the need for 303(d) listings. The Regional Board needs to address this defect.

Very truly yours

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