



Public Works Department

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10/25/06 BdMtg Item 10
303(d) List
Deadline: 10/20/06 5pm



October 17, 2006

Ms. Song Her, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – 2006 Federal CWA Section 303(d) List

Dear Ms. Her:

The City appreciates the opportunity to provide comments on the 2006 Federal CWA Section 303(d) list generated by the State Water Resources Control Board. The City recognizes the benefit of this program and the significant effort by State Water Resources Control Board (SWRCB) staff in the preparation of this list.

The City is under the impression that water bodies placed on the 303(d) list are those impaired or impacted by some form of chemical contamination. However, the Cosumnes River is on the list due to "exotic fish species" creating a decline in "native fish species". Although this is a serious issue, it does not appear to meet the criteria for placement on the 303(d) list. The City's concern is that this "narrative" form of "contamination" will be converted into a numeric limit in future SWRCB policy documents, which will then be placed in National Pollutant Discharge Elimination (NPDES) Permits for all dischargers that discharge into the Cosumnes River or a tributary to the Cosumnes River. The City requests that the SWRCB remove the exotic fish listing for the Cosumnes River from the 303(d) list.

If you have any questions or concerns regarding this letter, please contact me at (209) 366-7260.

Sincerely,

Gregg L. Halladay, P.E.
Director of Public Works

cc: Ted Anderson, City Manager, City of Galt