

~~840~~ 840



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

EPI-Center, 1013 Monterey Street, Suite 202 San Luis Obispo, CA 93401  
Phone: 805-781-9932 • Fax: 805-781-9384

## San Luis Obispo COASTKEEPER®

October 19, 2006

State Water Resources Control Board  
ATTN: Song Ho, Clerk to the Board  
1001 I Street  
Sacramento, CA 95814



VIA FACSIMILE: 916-342-5620

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

Dear Ms Ho,

Thank you for the opportunity to review and comment on the proposed Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments for California.

The San Luis Obispo COASTKEEPER®, a program of Environment in the Public Interest, is organized for the purpose of ensuring that the public has a voice with agencies and official responsible for enforcing water quality and watershed protection regulations on the California Central Coast. As such, the SLO COASTKEEPER® and our central coast members have a very high interest in the proposed Revisions.

San Luis Obispo COASTKEEPER® is part of a larger coalition of environmental organizations that will submit additional comment, however I am submitting the following comments specific to our interests in Region 3.



San Luis Obispo COASTKEEPER® a Program of Environment in the Public Interest is a trademark and service mark of WATERKEEPER® Alliance, Inc. and is licensed for use herein.

### 1. DO NOT LIST RECOMENDATIONS:

San Luis Obispo **COASTKEEPER**® supports Staff's "Do Not Delist" recommendations.

### 2. LISTING RECOMMENDATIONS:

San Luis Obispo **COASTKEEPER**® supports Staff's "List" recommendations.

### 3. DELISTING RECOMMENDATIONS:

Staff as recommended 16 water segments be delisted in Region 3. However, the evidence used to support the majority of the proposed delistings conflicts with data available from the CCAMP program and/or the Morro Bay National Estuary Program. San Luis Obispo **COASTKEEPER**® urges the following be removed from the delist category.

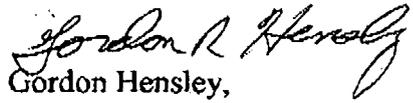
- Blosser Channel is recommended for delisting for the pollutant fecal coliform. The data presented conflicts with CCAMP data no demonstration that Blosser Channel has currently reached attainment.
- Carpenteria Marsh is recommended for delisting for the pollutant sedimentation/siltation because the original data has been lost. However, this rationale is inconsistent with the Listing Policy.
- Chumash Creek is recommended for delisting of the pollutant dissolved oxygen. The data presented conflicts with CCAMP and MBNEP data and the recommendation lacks demonstration that Chumash has currently reached attainment for dissolved oxygen.
- Monterey Bay South (Coastline) is recommended for delisting for pesticides due to failure to identify the specific pollutant causing the impairment. However the waterbody receives significant runoff from agricultural areas and Staff has provided no demonstration that attainment of water quality standards for specific pesticides has been achieved. San Luis Obispo **COASTKEEPER**® urges that this listing be corrected and the recommendation be reassigned to the "additions" category.
- Salinas Reclamation Canal is recommended for delisting for the pollutant nitrogen/nitrate. The data presented conflicts with CCAMP data and Staff has made no demonstration that the Salinas Reclamation Canal has currently reached attainment of the water quality standard for nitrogen/nitrate.
- Salinas River (lower) is recommended for delisting for the pollutant sedimentation/siltation. The data presented conflicts with CCAMP data and Staff has presented no demonstration that the lower Salinas River has currently reached attainment of the water quality standard for this pollutant.



- Salinas River (middle) is recommended for delisting for the pollutant sedimentation/siltation. The data presented conflicts with CCAMP data and Staff has presented no demonstration that the Salinas River (middle) has currently reached attainment of the water quality standard for this sedimentation/siltation.
- Salinas River Lagoon (North) is recommended for delisting for the pollutant sedimentation/siltation. The data presented conflicts with CCAMP data and Staff has presented no demonstration that the Salinas River Lagoon North has currently reached attainment of the water quality standard for this pollutant.
- Salinas River Lagoon (South) is recommended for delisting for the pollutant TDS. The data presented conflicts with CCAMP data and Staff has presented no demonstration that the Salinas River Lagoon South has currently reached attainment of the water quality standard for TDS.

Thank you for consideration of our comments.

Respectfully Submitted,

  
Gordon Hensley,  
San Luis Obispo COASTKEEPER\*



San Luis Obispo COASTKEEPER\* a Program of Environment in the Public Interest is a trademark and service mark of WATERKEEPER\* Alliance, Inc. and is licensed for use herein.