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Humboldt
Baykeeper

May 27, 2010

Inland Empire
Waterkeeper

Charlie Hoppin, Chair and Board Members
State Water Resources Control Board
1001 I Street

Klamath
Riverkeeper

Sacramento, CA 95814

Monterey
Coastkeeper

Via Electronic Mail: commentletters@waterboards.ca.gov

Orange County
Coastkeeper

RE: State Water Board's Proposed 2010 California 305(b)/303(d) Integrated Report

Russian
Riverkeeper

On behalf of the California Coastkeeper Alliance (CCKA), which represents 12 Waterkeepers from the Oregon border to San Diego, I welcome the opportunity to submit these comments on the State Water Board's Proposed 2010 California 305(b)/303(d) Integrated Report. CCKA commends the thorough and collaborative effort that State and Regional Water Board staff demonstrated throughout the process of updating California's 303(d) list. CCKA strongly supports the 1,464 new impaired water body-pollutant combinations proposed for addition to the 303(d) list in the 2010 Integrated Report; this unprecedented 57% increase in 303(d) listings since 2006, while of grave concern, is a notable achievement by State and Regional Water Board staff with respect to careful review of and attention to available data. Almost four decades after Congress promised fishable, drinkable waterways with the creation of the Clean Water Act, the 2010 Integrated Report details the severe impairment of more than 1,700 of our waterways, representing over 3,500 303(d) listings. The staggering number of impairments is a stark reminder to all Californians of the extent to which water pollution prevents the enjoyment of beneficial uses that waterways once provided and serves as a disturbing reflection of how very far we are from achieving the goals of the Clean Water Act. To begin to address this gap between goal articulation and goal achievement, CCKA strongly encourages the State Water Board to adopt all of the 1,464 new 303(d) listings proposed in the 2010 Integrated Report, and advocates that State and Regional Water Board staff swiftly implement enforceable, accountable strategies to clean up the state's waters.

San Francisco
Baykeeper

San Luis Obispo
Coastkeeper

Santa Barbara
Channelkeeper

Santa Monica
Baykeeper

Ventura
Coastkeeper

With respect to delistings, we commend the North Coast Regional Water Board for their adoption of our recommendation to oppose the delisting of Wooley Creek, a tributary to the Salmon River, which is impaired by temperature. Temperature observations by the Salmon River Restoration Council supported this listing, and we ask that you support the North Coast Regional Water Board's decision to retain this important listing. Additionally, we oppose the Central Coast Regional Water Board's recommendation to delist San Vicente Creek for impairment from sedimentation and siltation. The supporting Line of Evidence for this proposed delisting does not sufficiently prove that water quality standards are being met to a degree that satisfies the creek's designated beneficial uses. Therefore, as per the State Water Board's 303(d) Listing Policy, CCKA respectfully encourages you to retain this important 303(d) listing, and reject the delisting of San Vicente Creek proposed in the 2010 Integrated Report. Please see comment letter submitted by Monterey Coastkeeper Steve Shimek for a more detailed explanation of opposition to this delisting.

CCKA and member Waterkeepers actively cultivated public participation throughout the State and Regional Water Boards' process for the 303(d) list update in the 2010 Integrated Report. CCKA co-sponsored 15 public workshops with member Waterkeepers in 2009 and 2010 throughout the state's coastal watersheds, actively informing diverse groups of citizens, community leaders, water quality monitoring organizations, fishermen, and conservation-oriented public interest groups on how to get involved in this important process of developing these lists. This task was made far more straightforward after the release of the State Water Board's first online, interactive 303(d) maps; the maps provide an extremely useful, user-friendly tool for the public and decisionmakers to get involved in identifying and cleaning up polluted rivers, lakes, and coastal waters. We anticipate significant local public input on the final 2010 Integrated Report and in the 2012 scoping process as a result of this tool, which will benefit the waterways and people of the state. CCKA strongly urges the State Water Board to expand its use of such user-friendly, interactive maps beyond the Integrated Report as a means of conveying water quality issues, and the programs dedicated to addressing those issues, to the public and decisionmakers.

It should be noted that nearly 75% of the 303(d) listings proposed in the 2010 Integrated Report represent impairments that lie within the six coastal Water Board Regions (2,594 out of 3,507 total listings). CCKA urges the State Water Board to take a close look at coastal water quality issues that are responsible for many of these listings, such as polluted stormwater and agricultural runoff, sewage spills, insufficient flows of water in coastal streams and rivers, and polluted groundwater releases, and develop comprehensive, enforceable, accountable approaches to addressing these pervasive threats to coastal water quality on a coast-wide scale.

California's State and Regional Water Boards must hear the voices of those communities most affected by water pollution; the interactive Integrated Report maps are an excellent start, but more work can be done to ensure that the public's input – particularly with respect to locally collected data – is incorporated into state decisionmaking. CCKA looks forward to working with the State and Regional Water Boards to build a strong voice for clean water up and down the California coastline. CCKA will continue to hold 303(d) workshops throughout the summer to help constituents submit their data and information in formats most useful to State and Regional Water Board staff in their scoping for the 2012 303(d) list.

California deserves clean, thriving, flowing waterways, now and in the future. We urge the State Board's adoption of the recommended additions to the 2010 303(d) list, and look forward to working with you to building a public support network for restoring the state's impaired waters to good health.

Sincerely,

A handwritten signature in black ink that reads "Thomas B. Lyons". The signature is written in a cursive, slightly slanted style.

Tom Lyons, Policy & GIS Analyst
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