

From: [Melinda Fleming](#)
To: Simi_Jay@Waterboards
Cc: [Melinda Fleming](#)
Subject: Comment: 303(d) List Revisions
Date: Thursday, October 20, 2016 4:50:06 PM

RE: Proposed Revisions to the 2012 Clean Water Act Section 303(d) list of impaired water bodies

To: Central Valley Regional Water Quality Control Board (CVRWQCB)

Tuolumne County Alliance for Resources & Environment, (TuCARE) does not support the revisions proposed for the addition of the following six water bodies:

Bell Creek; Bull Meadow Creek; Jawbone Creek; Jawbone Creek, unnamed tributary; Niagara Creek; and Rose Creek.

Based on the cited "evidence" from one collecting entity known to have bias and previous false data regarding grazing in these areas, the CVRWQCB should not render any decisions until further, unbiased studies and data collection can take place. With no evidence other than that collected by the Central Sierra Environmental Research Center, without actual empirical collecting methodology by experts/scientists in the field, the collected data should not be considered other than anecdotal and subject to interpretation and bias.

Furthermore, research that has been done by scientific experts is being ignored due to the date of collection falling after the 2010 date. To refuse to use science-based/gathered data because it falls outside of the study period, when said data is in opposition to the older, less reliable data is poor judgement and bad science. The data gathered by UC Davis should be considered superior to the layperson collection by a biased and unregulated organization.

TuCARE seeks an alternative action by the CVRWQCB: Re-analysis of data to include data that was collected on those six water bodies, post 2010, with a special emphasis on data that was collected by experts and scientists in the process of empirical studies, using peer-reviewed evidence.

TuCARE is a community based non-profit organization founded in 1988. Our membership is made up of a cross-section of our community including local businesspersons, educators, retirees and those actively engaged in working on a daily basis with our natural resources. TuCARE supports conservation and the multiple-use of the many resources on our federal lands. Multiple-use policies allow for everyone to benefit. TuCARE firmly believes that man must play an active role to ensure our resources are available both now and in the future.

On behalf of TuCARE's over 700+ constituents we ask the CVRWQCB to delay revisions to the list of water bodies (cited above) till better and more accurate monitoring data can be included in the decision making process.

Sincerely,

Melinda Fleming

Executive Director

Tuolumne County Alliance for Resources & Environment (TuCARE)

P. O. Box 1056 Twain Harte, CA 95383

tucare@mlode.com or resources_4_all@sbcglobal.net

www.tucare.com

(209) 586-7816 office

(209) 352-8012 cell