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May 20, 2013

Danny McClure, P.E.
Senior Water Resource Control Engineer
Pesticide TMDL Unit
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive
Rancho Cordova, CA 95670-6114

Subject: March 2013 Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins ("Basin Plan") for the Control of Diazinon and Chlorpyrifos

Dear Mr. McClure:

Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to comment on the draft Amendments to the Basin Plan for the Control of Diazinon and Chlorpyrifos ("Draft Amendments") and the Draft Staff Report (March 2013) that accompanies and is intended to explain the Draft Amendments. SRCSD has the same concerns as the Central Valley Clean Water Associations (CVCWA), and therefore supports CVCWAs comments regarding:

- Application of WLAs only to domestic wastewater dischargers when reasonable potential exists, and then only applying to 303(d) listed waterbodies.
- Completeness of Water code 13241 analyses.
- Deleting the monitoring provision for POTWs to "determine whether alternatives should be performed by the manufacturers of alternative pesticides to diazinon and chlorpyrifos, as part of pesticide registration and review.

In SRCSDs October 26, 2012 letter we encouraged the Central Valley Regional Water Board to consider methods for compliance with the TMDL other than establishing an objective, prescribing waste load allocations (WLA), and then monitoring to confirm the objective and WLAs are met. The implementation plan could contain a comprehensive implementation strategy calling on Federal, State, local agencies, and others, to take actions to reduce the potential for pesticides to degrade water quality. This approach has been successful in the San Francisco Bay Region for diazinon.

We appreciate the opportunity to provide these comments, if you have any questions or need more information please contact me, at dornl@sacsewer.com, 916-876-6030.

Sincerely,

Linda Dorn
Environmental Program Manager

cc: Debbie Webster, Executive Officer CVCWA
Terrie Mitchell, Legislative and Regulatory Affairs Manager
Prabhakar Somavarapu, Director Policy and Planning
Vyomini Pandya, Associate Engineer