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2/11/04

**Draft Policy on Statewide Section 303(d) Listing Process  
Document Review Comments**

**February 11, 2004 fax to Craig J. Wilson/SWRCB from City of Norwalk**

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*The following comments on the documents identified below are submitted on behalf of the City of Norwalk by:*

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***"Water Quality Control Policy for Guidance on Assessing California's Surface Waters", 7/1/03 Draft (Policy) and "Functional Equivalent Document", 12/03 Draft***

Based on our review of the draft Policy, we have no suggested revisions at this time and support the document as currently drafted. The Policy represents a positive step forward in the Statewide standardization of the Section 303(d) List development process. The basis for our support includes the following observations on the Policy which are viewed as positive in the development of TMDLs:

- Promotes the assessment of water quality data using scientifically defensible procedures and standard statistical tests.
- Establishes that TMDL development shall be priority-based, with TMDLs being developed for the most severely impacted waters first.
- Addresses water quality concerns on the basis of individual water body segments, rather than entire water bodies.
- 303(d) List Development Methodology excludes water quality objective exceedances due to:
  - known spills and violations of permit/WDR requirements
  - uncontrollable physical water body alterations
  - natural background conditions (i.e., natural pollutant/pollution sources shall not cause a water body segment to be listed)
  - beach closure postings not backed by water quality data
- Provides for the comprehensive reevaluation of the 2002 Section 303(d) List based on this Policy.
- 303(d) List development shall be based on only the most recent data and information available (data generated within 10 years).
- Provides for the assessment of data quality and quantity in accordance with appropriate quality assurance and control procedures.
- Provides for Regional Board preparation of fact sheets summarizing the data and information collected for each water and pollutant/pollution combination proposed for inclusion in the California Integrated Water Quality Report.



**Charles Abbott Associates, Inc.**

# Fax Sheet

Date 2/11/04

Number of Pages (includes cover page) 2

### Message To

Name	Craig L. Wilson	Fax number	916/341-5550
Firm	SWRCB	Phone number	
cc:			

### From

Name	Mark Smith <i>MS</i>	Department	Environmental
File Locator	(see footer)	Project	Draft 303(d) List Policy
	PHONE/Fax : 310/548-8454		

- Urgent  
  FYI  
  Original To Follow  
  Comment Upon Review  
  Copy to Distribution List

**RE: Draft Policy on Statewide Section 303(d) Listing Process  
Document Review Comments from City of Norwalk**

Attached for your use are the referenced comments, respectfully submitted on behalf of the City of Norwalk.

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