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June 14, 2004

PETER W. MCGAW  
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**VIA ELECTRONIC MAIL AND U.S. MAIL**

Mr. Craig J. Wilson  
Chief, Monitoring and TMDL Listing Unit  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95812-0100

Subject: 2004 303(d) List (Region 5)  
– Don Pedro Reservoir (Mercury)  
– Harding Drain (Ammonia, Unknown Toxicity,  
Diazinon, Chlorpyrifos)

Dear Mr. Wilson:

We are writing on behalf of the Turlock Irrigation District (TID) to request that the State Water Resources Control Board reexamine the 303(d) listing of Don Pedro Reservoir (referred to in the 2002 303(d) List as "Don Pedro Lake") for impairment by mercury. TID also requests the Board reexamine the listing of the Harding Drain for Ammonia, Unknown Toxicity, Diazinon, and Chlorpyrifos.

As detailed below, the evidence that resulted in Don Pedro Reservoir being put on the 303(d) list in the first place would not pass muster under the new (draft) Listing/Delisting Policy (the "Policy").<sup>1</sup> With respect to the Harding Drain, a man-made agricultural drain, a new Use Attainability Analysis (UAA) has concluded that several of the designated Beneficial Uses for the Harding Drain are inappropriate. This new information should be taken into consideration when reevaluating the listing of the Harding Drain.

**RE-EVALUATION OF IMPAIRED WATER BODIES**

As a threshold matter, TID would like to reiterate its support for the current draft of the Policy to the extent that it provides a mechanism for re-evaluation of water bodies identified on previous 303(d) lists. TID has expressed concern in the past, however, regarding specific

<sup>1</sup> For the purposes of this request, TID assumes the draft Policy will be adopted in substantially the form it now exists. In the event there are changes to the policy, TID would be pleased to submit additional information if necessary to support this request.

Mr. Craig J. Wilson  
Re: 303(d) List – Don Pedro Reservoir  
– Harding Drain

June 14, 2004  
Page 2

provisions of the proposed Policy's mechanism for reviewing previous listings (see attached correspondence from Archer Norris dated February 17, 2004.) In that letter, TID suggested a few specific changes to the Listing/Delisting Policy that would clarify the Policy's intent and would bring the policy into conformance with the many public statements by various Board members and staff. TID requests that you review its present request in light of the comments set out in that letter.

To summarize those earlier suggestions, for at least this first round of consideration under the new Policy, existing listings should be reexamined whenever a requesting party makes a *prima facie* case that the listing would not be made if considered under the new policy. (A "*prima facie* case" is "one that will prevail in the absence of contrary evidence.") This would be consistent with the many public and private statements made by various Board members during the development and approval of the 2002 303(d) list. Had Don Pedro Reservoir been originally considered under the new policy, it would not have been included on the 303(d) list. Similarly, had the information from the UAA for the Harding Drain been available at the time the 2002 303(d) list was prepared, the Harding Drain might well not have been listed either or it may have been put on the "watch" list instead of on the TMDL list.

#### **REEXAMINATION OF THE DON PEDRO RESERVOIR LISTING**

There are two principal reasons the 303(d) listing of Don Pedro Reservoir for Mercury should be reexamined. First, the mercury data relied on to place Don Pedro Reservoir on the 2002 list are extremely suspect. All data were collected over 15 years ago (and some were collected over 20 years ago), before it was understood that "unclean" collection and analysis techniques were corrupting mercury data, resulting in the overstating of mercury levels. Thus, these fish tissue data would not have met the Policy's quality-of-data requirements for listing.

Second, the original listing was based on a misapplication of a USEPA guidance criterion. That criterion for concentrations of methyl mercury in fish tissue was based on an average consumption of fish from various trophic levels. The data evaluated for the Don Pedro Reservoir listing relied exclusively on data gathered from the highest trophic level. These Trophic Level 4 fish (essentially, the top of the aquatic food chain), tend to reflect higher methyl mercury accumulations, so comparing tissue concentrations in these fish to tissue concentrations in a *weighted average* of fish consumption from various trophic levels results in a comparison of "apples to oranges."

**In fact, in its responses to comments during the 2002 listing process, the State Board acknowledged this error and agreed that the appropriate weighted average methodology would be applied to future listings.** (October 2002 Staff Report response to comment, number 5.2.9). Now is the appropriate time to correct this acknowledged error.

In addition, that listing was based on a calculation that eliminated relevant "non-detect" data, inappropriately skewing the average concentration upward. There was no basis for deviating from the USEPA guidance methodology in this respect, any more than there was for

Mr. Craig J. Wilson  
Re: 303(d) List – Don Pedro Reservoir  
– Harding Drain

June 14, 2004

Page 3

comparing an average tissue concentration based on just one trophic level to a criterion based on a weighted average of consumption of various trophic levels.

**Existing Mercury Data for Don Pedro Reservoir would not be used under the Policy Because they are Outdated and are Likely Flawed**

The new Policy places a heavy emphasis on insuring listing decisions are based on good quality data. This reflects a recognition that many earlier listing decisions were based on data of marginal or questionable quality. The new Policy requires, “The quality of the data used in the development of the section 303(d) list shall be of sufficiently high quality to make determinations of water quality standards attainment.” (Policy, section 6.2.4). This Section goes on to state:

Numeric data are considered credible and relevant for listing purposes if the data set submitted meets the minimum quality assurance/quality control requirements outlined below. A QAPP [Quality Assurance Project Plan] or equivalent information must be available containing, at a minimum, the following elements:

- Objectives of the study, project, or monitoring program;
- Methods used for sample collection;
- Field and laboratory analysis;
- Data management procedures; and
- Personnel training.

A site-specific or project-specific sampling and analysis plan for numeric data must also be available containing:

- Data quality objectives or requirements of the project;
- Rationale for the selection of sampling sites, water quality parameters, sampling frequency and methods that assure the samples are spatially and temporally representative of the surface water and representative of conditions within the targeted sampling timeframe; and
- Information to support the conclusion that results are reproducible.

The RWQCBs shall clearly evaluate and make a finding in the fact sheets *on the appropriateness of data collection and analysis practices*.

(Emphasis added).

Mr. Craig J. Wilson  
Re: 303(d) List – Don Pedro Reservoir  
– Harding Drain

June 14, 2004  
Page 4

Section 6.2.4 continues:

If the data collection and analysis is not supported by a QAPP (or equivalent) or if it is not possible to tell if the data collection and analysis was supported by a QAPP (or equivalent), *then the data and information cannot be used by itself to support listing or delisting of a water segment*. These data may only be used to corroborate other data and information with appropriate quality assurance and quality control.

(Emphasis added).

The Policy also requires that data older than 10 years should generally not be used for listing decisions (“Only the most recent 10-year period of data and information shall be used for listing and delisting waters” – Section 6.2.5.2). The Policy specifically requires that, “*Older data must meet all quality requirements presented in this Policy.*” (*Id*; emphasis added)

The mercury data for Don Pedro Reservoir were collected between 16 and 23 years ago, from 1981 to 1987. To TID’s knowledge, there is no Quality Assurance Project Plan or any site-specific sampling and analysis plan for the data collected from Don Pedro Reservoir. Certainly, the fact sheet for the existing listing does not reflect the existence of any such plans. Thus, these data would not support a listing for mercury under the new Policy.

Moreover, the mercury data for Don Pedro Reservoir are likely flawed and clearly do not rise to the level of acceptable quality embodied in the new Policy. As noted above, these data were collected between 1981 and 1987. The data were collected using outdated techniques, which have been replaced with “clean” and “ultraclean” techniques for metals sampling (e.g., EPA method 1669 “Sampling Ambient Water for Trace Metals at EPA Water Quality Criteria Levels”) and analysis (e.g., EPA Method 1631, 245.7, 245.1, and 245.2) (Lee, P. R., An Evaluation of Low-level Mercury Analytical Techniques, WEFTEC 2002).

Since the mid-1990s, it has become clear that outdated techniques have produced historical measurements of trace metals in aquatic environments that were erroneously high because samples were contaminated during sampling, sample handling, and/or sample analysis. Comparisons of historic data that were collected using old techniques versus new techniques have shown significant drops in measured values, based on the difference in sampling techniques.

Frontier Geosciences, an analytical laboratory in Seattle that specializes in ultra-clean method of sampling trace metal, reports that the use of ultra-clean methods led to a drop in total mercury levels monitored in six Minnesota lakes by three orders of magnitude (Gerads, R., Frontier Geosciences Staff Scientist, personal conversation with representatives of Brown & Caldwell, October 30, 2002). In the same tests, a change in techniques led to a drop in methylmercury levels of one to two orders of magnitude. It has recently been reported that the

Mr. Craig J. Wilson  
Re: 303(d) List – Don Pedro Reservoir  
– Harding Drain

June 14, 2004  
Page 5

implementation of ultra-clean sampling and analysis methods reduced or eliminated metals discharge violations at three North Carolina wastewater treatment plants (Oakley, W. and D. Shellenbarger, Clean Techniques for Metal Collection and Analysis, WEFTEC 2002).

Although less work has been done in the area of fish tissue sampling than in the area of ambient water sampling, substantial metals contamination can also occur with fish tissue sampling, especially given the additional handling that is required (Gerads, R., personal conversation with representative of Brown & Caldwell; Kennard, M., Frontier Geosciences Staff Scientist, personal conversation with representative of Brown & Caldwell, October 31, 2002). Contamination can occur when metallic instruments (e.g., razor blades or metal food processor blades) are used for the dissection and homogenization of tissue samples. Only a handful of North American laboratories have documented that their current tissue processing procedures (use of stainless steel blades, thorough cleaning of equipment before and between sample processing) do not result in measurable contamination.

No information is available on the sampling and analysis methods used historically for Don Pedro Reservoir data and the associated level of accuracy. However, given that “clean” and “ultraclean” techniques were not in general use at that time, and in light of the substantial improvements in water column sampling techniques, and the resulting significant decreases in measured levels of mercury (two to three orders of magnitude, i.e. 100 to 1000 times lower than originally reported), it is likely that the fish tissue data from the 1980s is equally flawed.

There are other flaws in the Don Pedro Reservoir data that would not pass muster under the new Policy. For example, the data used to support the listing were not spatially representative of the entire Lake. The data were collected from just the northernmost arm of the Lake (Moccasin Creek, the Tuolumne River, and Woods Creek) between 1981 and 1987 during the Toxic Substances Monitoring Program or TSMP (SWRCB, 1995). Data from this very limited area of the Lake have been extrapolated to the entire 12,960-acre Lake. As observed by USEPA in the 2001 Methylmercury Water Quality Criterion, “Numerous factors can influence the bioaccumulation of mercury in aquatic biota. These include, but are not limited to, acidity (pH) of the water, length of the aquatic food chain, temperature, and dissolved organic material.” (Executive Summary, page xv). Extrapolation of data from a limited area to the entire water body violates section 6.2.5.3 of the new Policy: “Samples shall be collected to be representative of spatial characteristics of the water segment.”

In the fact sheet for the 2002 Don Pedro Reservoir listing, staff briefly concluded, “data is considered to be of adequate quality.” Given the age of the Don Pedro Reservoir mercury data, the findings from other recent studies on mercury sampling and analysis, and the other flaws in the data, it is clear there was no basis for this conclusion. Overall, the data relied on for the original 303(d) listing of Don Pedro Reservoir clearly would not satisfy the current Policy’s requirement for quality data. The listing should be reviewed.

Mr. Craig J. Wilson  
Re: 303(d) List – Don Pedro Reservoir  
– Harding Drain

June 14, 2004  
Page 6

### **The Listing of Don Pedro Reservoir for Mercury failed to properly average Trophic Levels of Fish Consumption**

Section 6.2.5.9 of the Policy memorializes what should be a truism, that application of guidance should be consistent with the guidance's own methodology. It states, "If the water quality objectives, criteria, or guidelines state a specific averaging period and/or mathematical transformation, the data should be transformed in a consistent manner prior to conducting any statistical analysis for placement of the water on the section 303(d) list." Unfortunately, what should be obvious did not occur in the original listing of Don Pedro Reservoir. The USEPA methyl mercury criterion was based on a *weighted average* of consumption of fish of different trophic levels. This criterion was then applied in the Don Pedro Reservoir listing process to an average fish tissue concentration derived from only one trophic level. This failure to follow the methodology that generated the criterion resulted in a skewed analysis, a likely overstatement of any risk, and the erroneous inclusion of Don Pedro Reservoir on the 2002 303(d) list.

In developing the 2001 Methylmercury Water Quality Criterion, the USEPA applied specific consumption rates of various trophic level fish based on the results of a national diet survey that determined human consumption of different types of fish in specific proportions, including Trophic Level 2 (21.7%), Trophic Level 3 (45.7%), and Trophic Level 4 (32.6%). As indicated by USEPA, Trophic Level 3 fish comprise about half of the total consumption, followed by Trophic Level 4, which comprises less than one-third of the total consumption. In addition, USEPA built into the criterion safety factors for pharmacokinetic variability and other uncertainties in order to insure its recommended criterion was protective of human health.

At the time of the original listing, the available data consisted of samples of 67 Trophic Level 3 and 4 fish collected from the Lake in 1981 and 1984-1987. Of these data, 35 samples were ignored, and the listing was based solely on the average tissue concentration derived from 32 Trophic Level 4 fish (largemouth bass). The original listing decision failed to apply the criterion's methodology of a *weighted average* fish consumption. Listing Don Pedro Reservoir based on this decision was inappropriate then; it would violate the new Policy now.<sup>2</sup>

There is an additional flaw in the original analysis. According to the original fact sheet, it appears that "non-detect" sample results were dropped from the analysis, rather than being included in the calculation. Non-detects are valid data that should be included in any analysis. Ignoring non-detects improperly increases the average. Indeed, the new Policy specifically requires that non-detects be considered in the analysis. (See Section 6.2.5.8).

It should also be noted that the original listing was not based on any evidence of health impairment or use impairment. No health or environmental agency has ever issued a fish consumption advisory for Don Pedro Reservoir. A representative of the Tuolumne County

<sup>2</sup> As noted earlier, the October 2002 Staff Report response to comments acknowledged this error and agreed that the appropriate weighted average methodology would be applied to future listings. (October 2002 Staff Report response to comment, number 5.2.9).

Mr. Craig J. Wilson  
Re: 303(d) List – Don Pedro Reservoir  
– Harding Drain

June 14, 2004  
Page 7

Health Department indicated that he was aware of the proposed 2002 303(d) listing of Don Pedro Reservoir, but was “very surprised” because he did not think that existing data warranted listing (Cruz, Walt, personal communication, October 2001). A representative from the Office of Environmental Health and Hazard Assessment (OEHHA) indicated that the TSMP data are not intended for health risk analysis and that they had not performed any risk analysis on the Lake (personal communication with Bob Brodberg, October 2001).

**Conclusion: Don Pedro Reservoir was not Properly Included on the 2002 303(d) List, and its Listing Should be Reexamined Now**

Taken together, potential contamination issues associated with historic data and problems with the analysis (i.e., use of incorrect consumption percentages and removal of non-detect values), cast serious doubt on whether there is a mercury problem in Don Pedro Reservoir. Given these flaws, it seems likely that new data and correct analysis would show that mercury bioaccumulation is not a problem in Don Pedro Reservoir.

At the very least, however, it is clear that the current listing of Don Pedro Reservoir would never have occurred under the new Policy. The existing data simply do not meet the new Policy’s appropriate requirement that listing decisions be based on valid, reproducible, reliable data. The listing of Don Pedro Reservoir for mercury should not have occurred in the first place, and that decision should now be reexamined under the new Policy.

**PLACEMENT OF THE HARDING DRAIN ON THE TMDL LIST SHOULD BE RECONSIDERED**

A number of events that could affect water quality objectives and water quality conditions in the Harding Drain have occurred since the 1998 listing and should be taken into consideration. A Use Attainability Analysis (UAA) for Harding Drain was completed in January 2004. This UAA was the result of a coordinated effort by the State Board, the Regional Board, and US EPA Region 9. The UAA concludes that several of the uses currently assigned to the Harding Drain cannot be attained (Revised Final Report, prepared by Tetra Tech for EPA Region 9, under EPA Contract No. 68-C-99-249, Work Assignment 2-63). Hydrologic modifications and physical conditions were cited in the UAA report as the basis for the removal of Cold Freshwater Habitat, Migration of Aquatic Organisms, and Spawning, Reproduction and/or Early Development uses for the drain. The UAA also concludes that the Municipal and Domestic Drinking Water Supply is not attainable on the Harding Drain and should be removed. The UAA notes particularly that the source is not suitable for drinking water given that the Harding Drain is a constructed agricultural drain, does not have a watershed that would supply source water, and consists primarily of agricultural return water and effluent from the Turlock wastewater treatment plant (WWTP).

In addition, it is TID’s understanding that the City of Turlock is actively working on plans to move its effluent outfall from the City’s WWTP out of the drain and discharge directly into the San Joaquin River. The City’s WWTP effluent is a significant source of ammonia to the drain and its removal would significantly reduce ammonia concentrations.

Mr. Craig J. Wilson  
Re: 303(d) List – Don Pedro Reservoir  
– Harding Drain

June 14, 2004  
Page 8

Finally, TID, along with others, has been taking steps to study and improve water quality in the Harding Drain. TID has recently been the recipient of two grants (Prop 13 and Prop 50) to reduce irrigation return flows, to study water quality in the drain, and develop a watershed assessment and plan to support water quality improvements. This ongoing work and new data to be generated should be considered in the future before any action would be taken on a TMDL for the Harding Drain. In the meantime, the Drain should remain a low priority or be removed entirely from the 303(d) list to a Watch List until better data are available and until the effectiveness of locally-driven actions can be assessed.

Thank you for your consideration. Please feel free to contact me at if you have any questions or would like to discuss these matters further.

Very truly yours,

ARCHER NORRIS



Peter W. McGaw

PWM:sea

Enclosure

cc: Mr. Robert Nees, Turlock Irrigation District  
Ms. Debra Liebersbach, Turlock Irrigation District  
Dr. Cynthia Paulson, Brown & Caldwell





162

#14

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February 17, 2004

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Via Facsimile (916) 341-5550  
and U.S. Mail

Craig J. Wilson  
TMDL Listing Unit, Division of Water Quality  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Re: WATER QUALITY CONTROL POLICY FOR DEVELOPING CALIFORNIA'S CLEAN  
WATER ACT SECTION 303(D) LIST

Dear Mr. Wilson:

On behalf of the Turlock Irrigation District (TID), we would like to thank the Board for this opportunity to comment on the proposed Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List ("Listing Policy"). The 303(d) List is an important regulatory precursor to developing TMDLs and it will be a significant step forward for the State to have a consistent, workable policy for adding and removing water bodies from the 303(d) list. We commend the Board and its staff for all of their hard work developing the proposed Listing Policy. TID's specific comments follow.

#### **Statistically Defensible Data Requirement.**

TID supports many of the proposals that have been incorporated in the current draft of the Listing Policy, particularly the emphasis on sound, statistically defensible scientific data to make listing decisions. We urge you to preserve these provisions as the Listing Policy goes through further revision.

#### **Re-evaluation of Impaired Water Bodies.**

TID also commends the Board for providing a mechanism for re-evaluation of water bodies identified on previous 303(d) lists using the Listing Policy. TID does have a concern, however, regarding the proposed Policy's provisions for reviewing previous listings. As currently proposed, the Listing Policy would require the party contesting the inclusion of a water body on the 303(d) list to produce new data or information demonstrating that the listing is improper (Section 6.1).

This provision conflicts with the many statements made publicly during the adoption of the 2002 303(d) list. On multiple occasions, the staff and the Board itself reassured the public that all listings on the 2002 303(d) list would be reviewed to see that they fit with the new Listing Policy. As a gesture of reciprocal good faith, many parties contemplating challenges to the 2002 List, including TID, refrained from bringing those challenges based on their understanding that the controversial listings on that List would be given a full, fresh review the next time around.

At least for the next 303(d) list, reevaluation should not be limited to solely those instances where new data or information are available. Many listings included on previous 303(d) lists are inappropriate because of inadequate data quantity or quality, evidence that natural sources have caused or contributed to the impairment, and/or water quality standards upon which listings were based are inappropriate. TID does not suggest that *every* listing cycle must begin the evaluation process anew, but, to ensure that TMDLs are conducted only where necessary and appropriate, the Listing Policy should clearly require a re-evaluation of water bodies identified on the 2002 303(d) list even if just based on existing information, at least when requested to in writing. To conserve staff resources, it would be appropriate for the Policy to require the requesting party to make a *prima facie* case that the listing would not be made if considered under the new policy. (A "*prima facie* case" is "one that will prevail in the absence of contrary evidence.")

This recommendation is consistent with the July 2003 Draft Policy and will assist in prioritizing scarce state resources. It is also appropriate, given that the 2002 303(d) list was developed without any consistent standards in place and at least some of those listings do not meet the requirement for listing under the proposed Policy. At least for the first round under the new policy, the Regional Board should be required to look at contested 2002 listings and affirmatively determine that the information for listing meets the requirements of the new policy, as if it were a new listing decision.

There is a paragraph near the end of section 6.1 that suggests the foregoing may in fact be what the Listing Policy intends to accomplish. If so, the paragraph, which starts, "An interested party may request an existing listing be reassessed . . ." should be clarified. First, it should be put into a separate section. Section 6.1 should address situations where a Regional Board obtains new, relevant information and conducts a review of a listing on its own initiative. A separate section (e.g., a new section 6.2) should address the situation where an interested party requests a review of an existing listing. The paragraph now located at the end of Section 6.1 should be moved to a new section and modified as follows:

6.2 An interested party may request an existing listing be reassessed under the provisions of the Policy. In requesting the reevaluation, the interested party must describe the reason(s) the listing is inappropriate, state the reason the Policy would lead to a different outcome, and provide the any new data and information

~~necessary to enable~~ that would assist the RWQCB and SWRCB to in conducting the review.

Finally, the last sentence of the present section 6.1 states, "The most recently completed section 303(d) list shall form the basis for any subsequent lists." This sentence is misplaced and confusing in its current location at the end of the "Evaluating Existing Listings" section. Because it is a general statement of the foundation for each subsequent listing process, it seems to belong at the beginning of section 4, "California Delisting Factors." The opening paragraph of section 4 would then read:

The most recently completed section 303(d) list shall form the basis for any subsequent lists. This section provides the methodology for removing waters from the section 303(d) list (including the water quality limited segments category, enforceable program category, and TMDLs completed category).

In this way, the Listing Policy would be clear that the prior 303(d) list is the starting point, not the end of the analysis.

#### **"Planning/Monitoring" List.**

A water body that does not meet the requirements of the Policy but which nonetheless raises some water quality concerns should be placed on a separate "planning/monitoring" list, as was proposed in the July 2003 Draft Policy for Guidance on Assessing California Surface Waters and which the Listing Policy should restore. This could be the result of a water body on the 2002 list being removed due to inadequate data quality, or as a result of identifying a disturbing water quality trend. Use of a planning list has been strongly recommended by the National Academy of Sciences (NAS) in its report to Congress and would avoid inappropriate listings, unnecessary TMDLs, and misdirection of resources.

#### **Reliance on Health Advisories.**

Section 3.1.4 is confusing. It is unclear from this section as it is now written whether the existence of a health advisory, alone, is sufficient to justify listing a water body. Health advisories against the consumption of edible organisms or a shellfish harvesting ban are just that: *advisory*. They are based on entirely different standards than are incorporated in every other section of the proposed Listing Policy. If the *data* that lead to the issuance of the health advisory meets the data quality and statistical significance requirements of the Listing Policy, then the water body should be added to the 303(d) list. If the data resulting in the issuance of the health advisory do *not* meet the Listing Policy's requirements, then the health advisory alone should not override this inadequate data and act as a separate, sufficient basis for adding the waterbody to the 303(d) list. As presently drafted, it is not clear whether the Listing Policy would allow this anomalous result.

It may be that the final sentence this section 3.1.4 is meant to address this issue and require that the *data* support the listing, not just the existence of a health advisory. If so, the sentence needs to be clarified. It states, "In addition, water segment-specific data are available indicating the evaluation guideline for tissue is exceeded." Does this mean that, in addition to a health advisory these additional data *must* exist in order to list a waterbody under this section, or are these data, if they exist, simply additional evidence that may be considered?

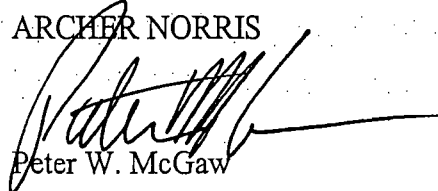
With either interpretation, the data supporting the health advisory may not be sufficient to meet the data requirements necessary to support a decision to list the water body. The sentence should be clarified so that it is clear that the data indicating that tissue residues exceed evaluation guidelines are of sufficient quantity and quality to justify the listing of the waterbody under the data requirements of the Listing Policy. TID suggests modifying the final sentence of section 3.1.4 to read as follows:

In addition, water segment-specific data meeting the data requirements of this Policy must be are available indicating the evaluation guideline for tissue is exceeded.

Again, TID appreciates this opportunity to comment on the proposed Listing Policy. With the simple changes identified above, this Policy will represent dramatic progress toward protecting and restoring California's waterways in a transparent and scientifically defensible fashion.

Very truly yours,

ARCHER NORRIS



Peter W. McGaw

PWM:sea

cc: Robert Nees, Assistant General Manager, TID  
Debra Liebersbach, Senior Civil Engineer, TID  
Dr. Cynthia Paulson, Brown & Caldwell

162

3-14

**From:** Craig J. Wilson  
**To:** Melenee Emanuel; Tim Stevens  
**Date:** 6/15/04 8:08AM  
**Subject:** Fwd: 2004-303(d) List - Request to Reexamine Don Pedro Reservoir and Harding Drain

For the record.

>>> "McGaw, Peter W" <pmcgaw@archernorris.com> Monday, June 14, 2004 >>>  
Dear Mr. Wilson:

Please find attached correspondence on behalf of the Turlock Irrigation District requesting a reexamination of the 303(d) listings of Don Pedro Reservoir and Harding Drain. A hard copy will follow by mail.

Please let me know if you have any difficulty opening the attachment. Thank you for your courtesies.

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<<TID - request to reconsider 303(d) Listings.pdf>>

*Electronic file*

**From:** Craig J. Wilson  
**To:** Melenee Emanuel; Tim Stevens  
**Date:** 6/15/04 8:16AM  
**Subject:** Fwd: 2004-303(d) List - Request to Reexamine Don Pedro Reservoir and Harding Drain

For the record. 2 of 2.

>>> "McGaw, Peter W" <pmcgaw@archernorris.com> Monday, June 14, 2004 >>>

Dear Mr. Wilson:

Please find attached correspondence on behalf of the Turlock Irrigation District requesting a reexamination of the 303(d) listings of Don Pedro Reservoir and Harding Drain. A hard copy will follow by mail.

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