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February 2, 2007

**BROWN AND  
CALDWELL**

Mr. Joe Karkoski and Mr. Gene Davis  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

**Subject: Response to Notice of Public Solicitation of Water Quality Data and Information for 2008 Integrated Report – List of Impaired Waters and Surface Water Quality Assessment [303(d)/305(b)]**

Dear Mr. Karkoski and Mr. Davis,

As representatives of the Turlock Irrigation District (TID), we are responding to the Notice of Public Solicitation of Water Quality Data and Information for 2008 Integrated Report – List of Impaired Waters and Surface Water Quality Assessment [303(d)/305(b)].

In January 2006, the TID submitted chlorpyrifos data to the State Water Resources Control Board in a comment letter that responded to the 2006 303(d) list. The data showed significant improvements in water quality in recent years. The letter also discussed changes within the watershed that have resulted in the water quality improvements evident in the data submitted.

Additional work is being conducted within the watershed to address water quality impairments. The TID is in the midst of implementing a Proposition 50 project aimed at improving water quality in the Harding Drain. The project includes detailed monitoring of water quality in the drain and tributary sources, a watershed assessment, a watershed management plan, and education and outreach. New data to be collected under the Proposition 50 project for the remaining two 303(d)-listed constituents on the Harding Drain, chlorpyrifos and unknown toxicity, will be available by or before March 2008.

The TID respectfully requests that you allow this data to be integrated into the 2008 303(d) listing process when it becomes available. Also, given the local efforts that are currently underway to address water quality issues in the Harding Drain, we ask that the proposed chlorpyrifos TMDL date be delayed from 2008 to 2010 or later to allow for completion of those efforts. Developing the TMDLs before local initiatives are completed would undermine these efforts, rather than enabling and encouraging local watershed stakeholders to “do the right thing” and take positive actions to address historic impairments and restore water quality.

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Thank you for your consideration. We would be happy to answer any questions or discuss the Proposition 50 project and preliminary results with you at any time (925-210-2477).

Very truly yours,

BROWN AND CALDWELL

A handwritten signature in black ink, appearing to read "Cyn Paulson", followed by a long horizontal line extending to the right.

Cynthia Paulson, Ph.D.  
Senior Vice President