

From: "Bruce Houdesheldt" <BruceH@norcalwater.org>
To: <dmccclure@waterboards.ca.gov>
CC: "Claus" <ClausS@LWA.com>
Date: 3/16/2009 1:17 PM
Subject: 303d Comments
Attachments: Bruce Houdesheldt (bruceh@norcalwater.org).vcf; 2008 303d review Memo.doc

Danny McClure
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Dear Mr. McClure:

Attached you will find the comments prepared on behalf of the Sacramento Valley Water Quality Coalition (Coalition) by its consultant Claus Suverkropp of Larry Walker Associates on the Proposed Revisions to the 303(d) List of Impaired Water Bodies attributed to agriculture in the Sacramento River Watershed. The Coalition represents close to 8600 irrigators organized into ten (10) subwatersheds covering approximately 1.3 million acres under the Irrigated Lands Regulatory Program (ILRP).

The comments are grouped into four (4) general categories: 1) Incorrectly assessed based on the State listing policy; 2) Invalid Evaluation Guidelines; 3) Listings incorrectly attributed to agriculture; and 4) Listings with incomplete assessments. In some instances the data actually supports delisting of the waterbody included in the Proposed Revisions to the 303d list.

The Coalition looks forward to your analysis of the comments provided and a continued dialog on revisions that should be made based on these comments.

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