



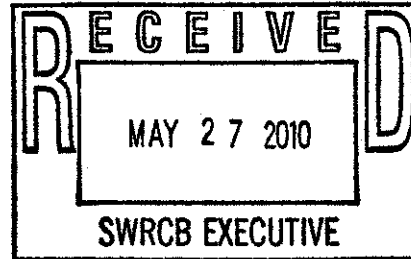
CITY OF STOCKTON

DEPARTMENT OF MUNICIPAL UTILITIES

2500 Navy Drive • Stockton, CA 95206-1191 • 209/937-8750 • Fax 209/937-8708
www.stocktongov.com

May 28, 2010

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



COMMENT LETTER – 2010 INTEGRATED REPORT / SECTION 303(D) LIST

The City of Stockton (City) appreciates the opportunity to review and provide comments on the *2010 Integrated Report – Clean Water Act Sections 303(d) and 305(b)* (Integrated Report). The City has completed its review of the proposed 2010 Section 303(d) List of Water Quality Limited Segments included in the Integrated Report and offers the following comments.

After reviewing the proposed 2010 303(d) list, the City recommends that Simazine in Pixley Slough (Region 5)¹ not be listed. The City's rationale for this recommendation is provided below.

- The supporting information for the listing states that Pixley Slough is being considered for placement on the 2010 303(d) list for Simazine pursuant to Section 3.1 of the Listing Policy², which only requires a single line of evidence necessary to assess the listing status³.
- The line of evidence provided is that "Two of 27 samples available concentrations exceeded drinking water standard (4 µg/L) and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy."
- This conclusion is inconsistent with the Listing Policy. Table 3.1 of the Listing Policy specifies that a water body should be listed if three or more exceedances exist in a dataset containing between 25-36 data points.

¹ Water Body ID CAR5312000020080803212723, Decision ID 12425

² *Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List*, September 2004.

³ One line of evidence is provided to support this listing.

http://www.waterboards.ca.gov/water_issues/programs/tmdl/2010state_ir_reports/02122.shtml#12425



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Since the single line of evidence used to support the listing is inconsistent with the Listing Policy, the City recommends that Pixley Slough not be listed for Simazine in the 2010 303(d) List.

The City appreciates your consideration of this comment. If you have any questions, please contact **Courtney Vasquez** at (209) 937-8705.



MARK J. MADISON
DIRECTOR OF MUNICIPAL UTILITIES

MJM:JW:ep