March 16, 2009

Mr. Danny McClure
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. McClure,

Hume Lake Christian Camps appreciates the opportunity to comment on the proposed addition of Hume Lake to the State of California's 303(d) List of Impaired Water Bodies. We are concerned with two areas in your quantitative analysis and respectfully challenge your conclusion.

The two areas of concern are:

1. The very small and narrow depth of Dissolved Oxygen data; is insufficient to make any extrapolated determination on a body of water. Furthermore, to look at a single string of data without any supporting matrix underlines the insufficient evidence for the determination of an impaired body of water using your current breadth of data.

2. The 'Beneficial Use' determination of a cold water fishery does not fit the intent of this body of water. I know trying to change the beneficial use of Hume Lake exceeds the scope of this determining board. But to acknowledge the questionability of the current 'Beneficial Use' determination further underlines the insufficient evidence to support a determination for the Hume Lake 303(d) listing.

Supporting documentation for the concerned areas is attached.

Hume Lake Christian Camps is a major stakeholder as we use this body of water frequently and would like to be a part of the solution and support the Regional Water Quality Control Board with any further steps needed to conclusively determine the future of Hume Lake's water quality.

Thank you for your consideration,

Jon Nelson
Hume Lake Christian Camps
Utilities Manager
(559) 305-7409
jnelson@humelake.org

The very small and narrow data sampling of Dissolved Oxygen without any secondary stranded matrix is insufficient evidence to make any extrapolated determination on this body of water. The depth of sampling: eight (8) days of sampling taking over 3 years is not even enough to form a baseline, let alone a determination. Here is the data:

Hume Lake DO Sampling Data from SWAMP Records

Date:	Location:	DO reading
4/26/2002	Dam	9.04
	Long Meadow	7.78
	Ten Mile	9.97
Daily average		8.93

Date:	Location:	DO reading
3/13/2003	Dam	7.4
	Long Meadow	8.02
	Ten Mile	8.55
Daily average*		8.0

6/13/2002	Dam	6.72
	Long Meadow	6.51
	Ten Mile	6.83
Daily average		6.69

11/13/2003	Dam	8.75
	Long Meadow	8.09
	Ten Mile	8.15
Daily average		8.33

9/25/2002	Dam	8.12
	Long Meadow	6.58
	Ten Mile	7.45
Daily average		7.38

5/26/2004	Dam	6.24
	Long Meadow	5.75
	Ten Mile	6.25
Daily average		6.08

12/5/2002	Dam	8.71
	Long Meadow	12.3
	Ten Mile	14.3
Daily average*		11.8

10/5/2004	Dam	8.5
	Long Meadow	5.47
	Ten Mile	6.98
Daily average*		7.0

* Rounded to the significant figures given by SWAMP.

*From this sampling, the weak conclusion that I can make is that on **2 of 8 days Hume Lake exceeded** the lower limit of 7.0 mg/L for Dissolved oxygen based on the cold water fisheries habitat of Beneficial uses*.

Furthermore look at a single string of data without any supporting matrix (potential future considerations: water temperature, lake depth, natural variances [Iron springs, silting, drought, fires]) is further evidence of insufficient support for determination of an impaired body of water.

Looking at the Beneficial Use determination, Hume Lake was made for use as a mill pond for the lumbering of Giant Sequoias. Hume Lake was never intended for the purposed use as a cold water fishery. This is evidenced by the lack of fish supporting elements of the dam, no fish ladder or bypass for upstream spawning. Also evidenced by the stumps (organics left in the lake) and the shallowness at Long Meadow Creek inlet. To acknowledge the questionability of the current 'Beneficial Use' determination, further underlines the insufficient evidence to support a determination for the Hume Lake 303(d) listing.