



RESOURCE MANAGEMENT AGENCY PLANNING DEPARTMENT

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March 16, 2009

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

RE: Proposed 303(d) List Revisions

Dear Mr. McClure,

Madera County has reviewed the proposed revisions to the 303(d) List of Impaired Water Bodies and Integrated Report. County Staff disagrees with the findings of the Regional Water Quality Control Board (RWQCB) specifically relating to Decision ID #8636 of the Integrated Report. This claims that the dissolved oxygen levels in the upper Fresno River do not meet current standards of the RWQCB. Staff has reviewed the report and disagrees with the findings for the following reasons:

- The samples collected were taken 8 years ago.
- The samples were collected in the late summer months from mostly stagnant / low-flow waters.
- The report states "The Basin Plan Objective sets the minimum Dissolved Oxygen content at 8 mg/L. However, after reviewing *Appendix 3 Basin Plan Water Quality Objectives*, this number is incorrect. The required level is only 5 mg/L in inland surface waters designated as Marine Habitat or Warm Freshwater Habitat. According to this, the number of exceedances (based on the RWQCB samples) would drop from 11 occurrences of 15 samples, to only 5 occurrences of 15 samples.

I would conclude by stating that these samples are outdated and should be redone. Madera County is currently undergoing efforts to conduct an overall analysis of the existing watershed. This includes extensive field studies to evaluate sedimentation, exotic invasive species, water quality, etc.

Madera County would like to set up a meeting with RWQCB to further discuss the dissolved oxygen content matter of the upper Fresno River Watershed. Please contact me at (559) 675-7821 at your earliest convenience.

Sincerely,

JERALD JAMES
Planning Director

cc: Tom Wheeler, Board of Supervisors