



May 13, 2010

Pamela Creedon, Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, California 95670-6114

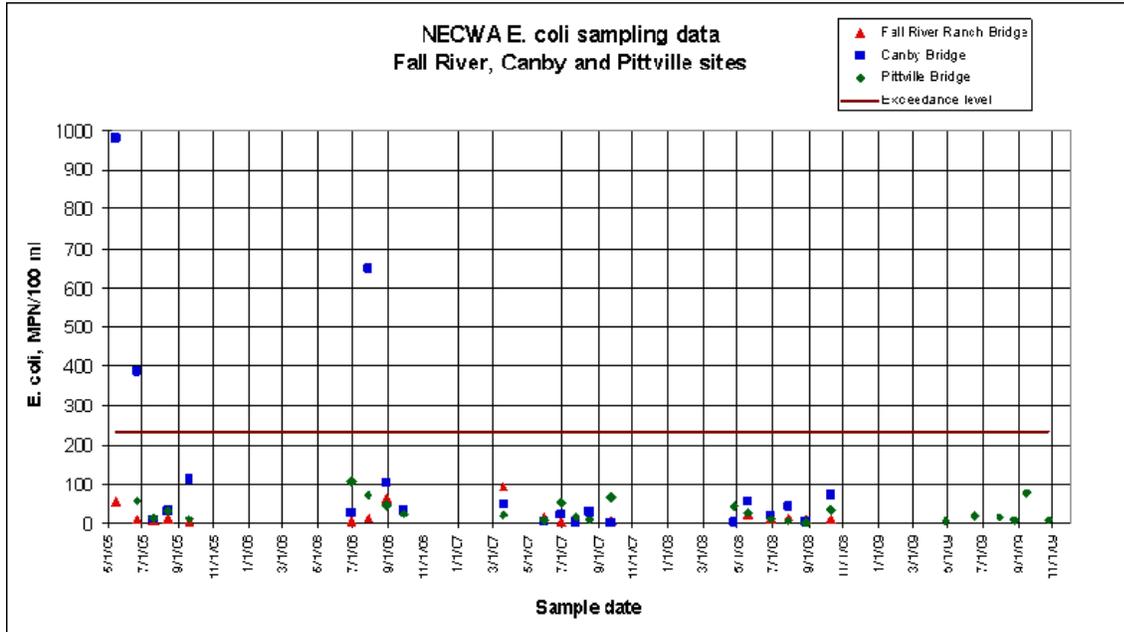
**RE: Request to Eliminate E. coli Management Plan Requirement – Pit River**

Dear Ms. Creedon

The Sacramento Valley Water Quality Coalition (SVWQC) and its growers and partners in the Northeast California Water Association (a.k.a. Pit River Subwatershed) have been conducting Assessment, Core and Special Project monitoring of surface water quality at the Pit River at Pittville, and Special Project monitoring at the Pit River at Canby and the Fall River at the Fall River Bridge since 2005. The Upper Pit River Subwatershed encompasses approximately 2,767,000 acres, extending from the Warner Mountains along the South Fork Pit River, to Shasta Lake in Shasta County. The subwatershed includes portions of Modoc, Lassen and Shasta counties. The topography is characterized by mountainous terrain with elevations ranging from approximately 3,200 to 9,833 feet above sea level. The low gradient of valley floors throughout the watershed is attributed to the deposition of large amounts of volcanic material. Approximately 44% of the acreage is privately owned, with predominant uses in timber, livestock grazing, and production agriculture (ranching, hay/alfalfa, and wild rice), timber, and livestock grazing. It is estimated that 152,196 irrigated acres of privately owned land are currently in production. The remaining 56% of the subwatershed is held by federal and state agencies.

Furthermore, the *Existing Conditions Report (December 2008)* that will be used in the development of the Long Term Irrigated Lands Regulatory Program (LT ILRP) states, "More than 95 percent of the Pit River Watershed is classified as native vegetation".

During five (5) years of monitoring and sampling there have been three (3) exceedances out of a total of 69 *E. coli* analyses in the Pit River Subwatershed. All of the exceedances occurred at the Pit River at Canby site, but as the chart below shows those exceedances haven't occurred since the summer of 2006. No exceedances have been observed at the lower Pit River site at Pittville. Additionally, no exceedances have been observed since the Alturas Wastewater Treatment upgraded the facility in 2008 to address exceedances of effluent limits for coliform bacteria and other parameters. The Alturas treatment facility is upstream from the Pit River site at Canby and was the likely source of some of the exceedances observed at that site.



While the SVWQC Management Plan (approved February 2009) reflects the monitoring results and management plan requirements triggered prior to September 2007, there have been no exceedances in the past three years and these more recent results would NOT warrant the Management Plan requirement.

Therefore the SVWQC on behalf of the NeCWA members request the Management Plan be modified to eliminate the Management Plan requirements.

Thank you in advance for your consideration of this request.

Sincerely,

Bruce Houdesheldt  
Director of Regulatory Affairs  
Northern California Water Association/Sacramento Valley Water Quality Coalition

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|-----|-----------------|---------------|------------------|
| Cc: | Joe Karkoski    | Susan Fregien | Mark Cady        |
|     | Robert Holscher | Helen Albaugh | Rod McArthur     |
|     | Henry Giacomini | Ted deBraga   | Claus Suverkropp |
|     |                 |               | Craig McArthur   |