



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

February 2, 2010

Anthony Toto
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

Re: Triennial Review for Tulare Lake Basin

Dear Mr. Toto:

This letter is in response to the California Regional Water Quality Control Board, Central Valley Region's (Regional Board's) request for comments on the Triennial Review of the Water Quality Control Plan for the Tulare Lake Basin. EPA previously commented on the plan for the workshop that the Regional Board conducted on September 13, 2007. Our comments are summarized below, and focus on the Triennial Review priorities. We may have specific concerns on each of the priority issues, as they are raised through the basin planning process.

We would like to reiterate our comments from our letter of September 13, 2007, which agreed with the inclusion of issues that would address improving the monitoring and management of ground water in the Basin.

We are also pleased to see the inclusion of issue 2 which calls for the Regional Board to coordinate with the Department of Fish and Game in the area of threats to wetlands, focusing on protection of vernal pools and other wetlands within the Tulare Lake basin.

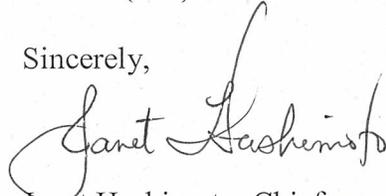
We support as high priorities the following, as summarized in the Issue List and Work Plan: 1. Beneficial Use Designations; 2. Wetlands; 3. Salt and Nitrate Management Plan; 4. Groundwater Assessment and Control Programs; and 5. Electrical Conductivity Effluent Limit.

Several of these priorities can be addressed through the Irrigated Lands program, which is mentioned in the context of nitrates in groundwater. We support directing monitoring conducted for this program to sources and impacts of ground water as well as surface water contamination. Measures to reduce or eliminate problems where community drinking water sources are affected should be a priority.

An additional issue that has come to our attention since the workshop is that it may be necessary to revise, as appropriate, pentachlorophenol (PCP) water quality objectives in waters that support early life stages (ELs) of salmonids. This request is a result of US EPA's Endangered Species Act consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service for the California Toxics Rule. EPA sent a letter to the State Water Resources Control Board on November 14, 2007, requesting that more stringent freshwater chronic criteria for PCP should be adopted, on a site-specific basis, in waters containing ELs of salmonids: 10 ug/l where ELs of salmonids are present, and 5 ug/l in those waters that also have low DO and high temperatures. EPA recommends that the Regional Board address potential revisions to the PCP water quality objectives as a part of this Triennial Review process.

We look forward to working with you further on the priority issues identified through this Triennial Review process. If you have any questions, please do not hesitate to call me at (415) 972-3452 or Matthew Mitchell at (415) 972-3508.

Sincerely,

A handwritten signature in cursive script that reads "Janet Hashimoto". The signature is written in black ink and is positioned above the printed name.

Janet Hashimoto, Chief
Standards and TMDL Office