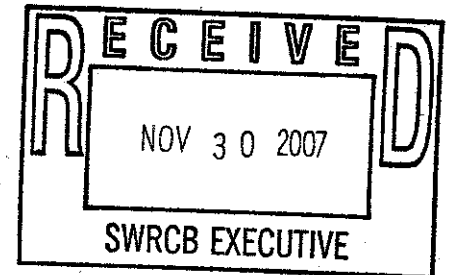


**California Rice Commission**  
**East San Joaquin Water Quality Coalition**  
**Sacramento Valley Water Quality Coalition**

VIA ELECTRONIC MAIL: [cbeegan@waterboards.ca.gov](mailto:cbeegan@waterboards.ca.gov)

November 30, 2007

Mr. Chris Beegan  
State Water Resources Control Board (SWRCB)  
Division of Water Quality  
P.O. Box 100  
Sacramento, CA 95812-0100



**Re: Draft Staff Report Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1  
Sediment Quality**

Dear Mr. Beegan:

On behalf of the California Rice Commission, East San Joaquin Water Quality Coalition and the Sacramento Valley Water Quality Coalition, collectively hereafter referred to as Coalitions, this letter serves to comment on the State Water Resources Control Board's (SWRCB) report entitled "Draft Staff Report Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality."

The SWRCB staff is to be commended in the development of this sediment quality objective (SQO) through a transparent, diverse stakeholder process and the use of the Scientific Steering Committee, which has resulted in this scientifically sound approach to measure sediment impairment, the first of its kind in the entire nation. The Coalitions would like to offer our support for the multiple lines of evidence (MLOE) approach to interpreting narrative SQOs.

The Coalitions believe that the Regional Water Quality Control Board (RWQCB) is embarking on sediment quality regulatory programs for agricultural pesticides and other toxic chemicals would serve the SWRCB's interest well by wholly adopting these narrative SQOs indicators and threshold used to interpret the narrative objectives and the program of implementation, where sufficient data exists.

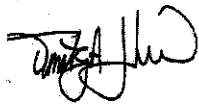
Although the water bodies described in the staff report are enclosed bays and estuaries, our organization supports Western Plant Health Association's (WPHA) scientific conclusion that there is no conceptual difference between them and inland surface waters other than the nature of the benthos and the habitat supporting the benthic community. Furthermore, we support WPHA's position that the MLOE method for enclosed bays and estuaries are directly applicable to inland surface waters and need only the data unique to these water bodies to successfully implement a MLOE SQO program.

Under the SWRCB's draft plan the RWQCBs would list water bodies as exceeding the SQOs if the MLOE has demonstrated with sufficient data to indicate sediment impairment. This requirement for additional evidence of impairment could potentially reduce the number of water bodies incorrectly listed as impaired for chemical constituents of concern that be used by our agricultural sector. Reliance on

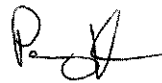
MLOE to make listing decisions logically should provide greater confidence in the decision-making process and result in fewer false positives and false negatives. The Coalitions believe the outcome will be a greater efficiency in the use of state resources to administer SQO programs and would result in the reduction in the amount of unnecessary economic burden on the regulated agricultural community, while still protecting sediment quality. Our Coalitions firmly supports the SQO's successful adoption and implementation by all nine of the RWQCBs. Accordingly, our Coalitions recommend that the SWRCB provide guidance and oversight to the RWQCBs in order to ensure uniformity and consistency in implementing the SQO throughout California.

In closing, the Coalitions thank the SWRCB for considering the agricultural industry's comments on the draft SQO part 1.

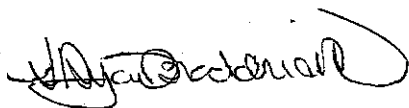
Sincerely,



Tim Johnson  
California Rice Commission



Parry Klassen  
East San Joaquin Water Quality Coalition



L. Ryan Broddrick  
Sacramento Valley Water Quality Coalition