

TURLOCK IRRIGATION DISTRICT
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March 7, 2008

VIA E-MAIL

Sue McConnell, P.E.
Senior Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Ms. McConnell,

RE: February 29, 2008 Draft Cleanup and Abatement Order, Stanislaus Almond Ranch LLC
and Lake Road Grizzly Ranch LLC, Stanislaus County

The Turlock Irrigation District appreciates the Regional Board's efforts in addressing recent sedimentation related stormwater impacts to the Tuolumne River downstream of Peaslee Creek. It is the District's hope that the Draft Cleanup and Abatement Order will not only help ensure the river is protected from future sedimentation from this source, but also provide a mechanism for remediating the impacts from the 2008 stormwater season. The comments provided below were developed to assist the Regional Board in understanding the District's concerns with respect to potential river habitat impacts, as well as the information and resources available to help the discharger and Regional Board in their efforts.

As you may know, the Tuolumne River provides important habitat for numerous species. Nineteen miles of the river downstream of Peaslee Creek is a designated salmonid spawning area (Fish and Game Code 1505), with additional riffles areas extending further downstream. Of particular concern to the District are the initial and ongoing impacts to the river's salmonid populations, their habitats and food sources. The 2007 Tuolumne River fall salmon run was near record low levels. Life stages within gravels (eggs/alevins) both this year, as well as in future years, may be directly impacted due to sedimentation accumulated in the spawning reaches. In addition, growth and survival of swimming life stages may continue to be negatively affected. There are similar concerns for rainbow trout, including impacts to winter spawning success. Another concern is that accumulated deposits of fine sediments in the river below Peaslee Creek may be further mobilized when river flow increases occur later next month, during spring pulse flow operations, unless remediation is quickly pursued.

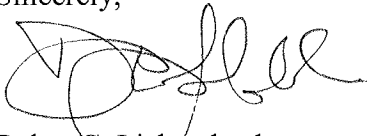
The District believes the Stabilization and Cleanup Plan (Plan) required by the Draft Order should identify and require complete clean up and full mitigation of damages to the river's biological and physical environment, including spawning gravel areas. Examples of analyses to evaluate impacts could include:

- (1) bulk gravel samples examining fine sediment infiltration into gravels,
- (2) other sampling examining degradation of spawning gravel quality,
- (3) photo documentation of surface storage of fine sediment,
- (4) surface substrate counts and/or mapping documenting storage of fine sediment,
- (5) cross section surveys and determination of fine sediment storage within pool areas, and
- (6) macrobenthic invertebrate and other biotic surveys.

The Tuolumne River is the site of recent restoration projects to improve instream salmonid habitat, including several downstream of Peaslee Creek. There is some baseline data that could be useful for initial impact assessment as a result of prior work on a river, including a restoration project completed just two miles downstream of Peaslee Creek. The District's aquatic biologist, Tim Ford, has worked for over 25 years studying the river and developing programs to preserve and protect Tuolumne River habitat and fisheries. He has an extensive knowledge and understanding of the river. Please do not hesitate to contact Tim for further information on the data available to assist in evaluating the temporal and/or spatial impacts associated with the sedimentation.

The Turlock Irrigation District thanks the Regional Water Quality Control Board for their attention to this serious issue impacting the Tuolumne River. Should you have any questions regarding the above comments, please do not hesitate to contact either Tim Ford at (209) 883-8275 or myself at (209) 883-8428.

Sincerely,



Debra C. Liebersbach
Water Planning Department Manager

cc: Walter Ward - Modesto Irrigation District
Donn Furman - City and County of San Francisco
Kirk Ford - Stanislaus County
California Department of Fish and Game - Fresno office
NMFS - Sacramento office
USFWS - Sacramento office
ACOE - Sacramento office
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