



Inland Empire Waterkeeper

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June 2, 2006

Mark Adelson
Senior Environmental Scientist
Santa Ana Regional Water Quality Control Board

RE: 2006 BASIN PLAN TRIENNIAL REVIEW PRIORITY LIST

Dear Mr. Adelson,

Inland Empire Waterkeeper is pleased to submit the following comments regarding the 2006 Basin Plan Triennial Review Priority List.

1. IEWK supports item one to amend the Basin Plan to include a prohibition on the use of septic tank subsurface disposal systems in the Quail Valley area.
2. IEWK does not support revisions to the SHEL beneficial use definition to include “harvesting for bait purposes” and exclude “human consumption.” From an ecological perspective, to minimize water quality standards in this manner fails to consider the negative environmental impact that biomagnification (the increase in concentration of a pollutant from one link in a food chain to another) may have on human health. Therefore, this item should be dropped from the list and not considered.
3. IEWK strongly supports items seven, eight, and nine. All three should be developed/added and given higher priority on the list.
4. IEWK does not support removing site-specific objectives for copper, cadmium, and lead for the middle SAR and their tributaries.
5. Revisions of numeric objectives for residual chlorine for discharges to surface waters in item 11 should only be considered if this revision lowers the numeric standard for these discharges.
6. IEWK strongly supports the addition of the listed beneficial use designations discussed in item 13.1. We would like to see this item receive higher priority on the list.
7. Item 13.2 to re-designate the appropriate beneficial uses listed should only be considered after thorough temperature monitoring has been conducted for Mill Creek.
8. IEWK strongly supports the addition of the listed waters to Tables 3-1 and 4-1 and the assignment of appropriate WQS. This item merits higher priority.
9. IEWK also supports items 17, 18, and 19.
10. IEWK supports item 20 to revise and make clear that WQSs apply to intermittent surface waters and would like this item to receive higher priority on the list.
11. We also support items 22, 25, 26, 27, and 30 and would like to see them receive higher priority in the triennial review.

Thank you for the opportunity to provide you with these comments. If you have any questions relating to these comments please do not hesitate to contact me.

Sincerely,

Mandy Revell
Director
Inland Empire Waterkeeper