



Chair Tam Doduc  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
Via Electronic Mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

July 6, 2008

**Re: Basin Plan Amendment to Incorporate TMDLs for metals in Chollas Creek**

Dear Chair Doduc:

San Diego Coastkeeper ("Coastkeeper") is a non-profit organization working to protect the region's bays, beaches, watersheds, and ocean. Coastkeeper believes the implementation of TMDLs for metals in Chollas Creek is an important step toward achieving water quality objectives and minimizing adverse affects on the beneficial uses for this water body.

We hope that the State Board will approve the Basin Plan Amendment as adopted by the San Diego Regional Water Board. Chollas Creek has been on the EPA's 303(d) list for over ten years. Urban runoff and storm water discharges into the MS4s have elevated the levels of dissolved metals in Chollas Creek beyond water quality standards. These elevated concentrations of dissolved metals impair the beneficial uses of Chollas Creek as Warm Freshwater Habitat and Wildlife Habitat that require water quality suitable for the protection of aquatic life and aquatic dependent wildlife. The concentrations of dissolved metals in Chollas Creek exceed the levels necessary to support these beneficial uses and must be decreased as quickly as possible to prevent further harm on these habitats and wildlife.

Although we support the compliance period set forth in the Amendment, the toxicity of metals in Chollas Creek cannot be decreased without the prompt implementation of the TMDL. Action on this matter has been postponed long enough. We hope that the State Board will approve the Amendment as soon as possible in order to curtail further delays.

Thank you for your consideration regarding this important matter and the opportunity to submit our comment.

Sincerely,

Fidelia Chieng  
*Legal Intern*

Gabriel Solmer  
*Supervising Attorney*

