



Western States Petroleum Association
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Handwritten marks: a stylized 'E', a circled '151' with a slash through it, '624', and a circled '8'.

Steven Arta
Senior Coordinator

January 31, 2006

Selica Potter, Acting Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814



303 (d) Deadline:
1/31/06

Subject: Western States Petroleum Association (WSPA) comments on 2006 proposed changes to the California 303(d) List for the Dominguez Channel Watershed.

Dear Ms. Potter,

On behalf of the Western States Petroleum Association ("WSPA"), we appreciate the opportunity to provide comments on the proposal by the State Water Resources Control Board ("State Board") to amend the 303(d) List of Impaired Waters for the Dominguez Channel Watershed. WSPA members operate numerous facilities in Dominguez Channel Watershed including petroleum refineries, bulk terminals, tank farms, retail service stations and pipeline distribution facilities which discharge storm water associated with these industrial operations and therefore have a direct interest the State Board's effort to amend the 303(d) listings for Dominguez Channel.

WSPA and its members support both the State Board and Regional Board's ongoing efforts to address water quality issues and impairments within the Dominguez Channel Watershed. However, we do have several concerns regarding the proposed listings related to sediment quality. Our comments are detailed below.

1. The New State 303(d) Listing Policy Greatly Improves the Draft 2006 List; WSPA Supports Proposed Delistings for Dominguez Channel:

First, WSPA notes that we appreciate the clarity and objectivity brought by the State's New Listing Policy (September 2004). While we do not agree with all of the recommended listing decisions, the Board's recommendations – and the basis for those recommendations – are far clearer than in previous listing cycles.