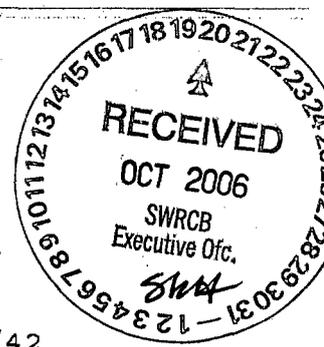




UNITED STATES MARINE CORPS
MARINE CORPS BASE
BOX 555008
CAMP PENDLETON, CALIFORNIA 92055-5008



832

5090.7
ENVSEC/42
October 20, 2006

Ms. Song Her, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Members of the Board:

SUBJECT: COMMENTS ON PROPOSED 303(d) LISTINGS IN DE LUZ CREEK

In accordance with the Board's Notice for Public Comments of September 20, 2006, Camp Pendleton hereby reiterates our concerns, previously expressed in our letter of January 31, 2006, over the proposed listing of De Luz Creek for Iron and Manganese.

Assuming Iron and Manganese exceed numeric water quality objectives as alleged, to the best of our knowledge both of these substances naturally occur in the watershed. We know of no anthropogenic sources or activities which would increase loadings of Iron and Manganese above naturally occurring, background concentrations to merit development of a TMDL.

We are also concerned over the reliability and geographic relevance of data used to support the listing for De Luz Creek. Staff relies on nine non-verified samples as its basis for impairment, notwithstanding the 2004 Listing Policy that seems to require 26 samples before a reliable conclusion of impairment can be made on the basis of five exceedances.

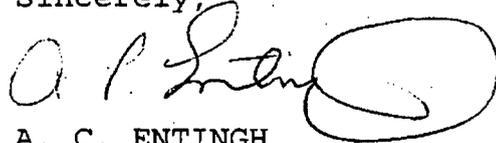
Moreover, the fact sheets supporting the proposed listings seem to indicate that all of the De Luz Creek sites sampled to support the proposed listing are located up-gradient of Camp Pendleton. It is quite possible that alleged impairment for these substances does not occur in the segments of De Luz Creek on Camp Pendleton. We suggest additional data gathering, and consideration of the beneficial uses supported, before a determination of impairment can be made in any portion of the watershed.

SN 7540-01-317-7366		5099-101		GENERAL SERVICES ADMINISTRATION	
Fax # (916) 341-5620		768-725-4247			
Phone # SWRCB		768-725-4557			
From Song Her		Camp Pendleton			
# of pages		2		FAX TRANSMITTAL	

5090.7
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Accordingly, we request the Board reconsider the proposed listing for Iron and Manganese in De Luz Creek. If there are any questions, please do not hesitate to contact me at (760) 725-4557 or Dr. Khalique Khan at (760) 725-9753.

Sincerely,



A. C. ENTINGH
Env Compliance Department Head
Assistant Chief of Staff,
Environmental Security
By direction of the
Commanding Officer

Copy to:
Region 9 RWQCB