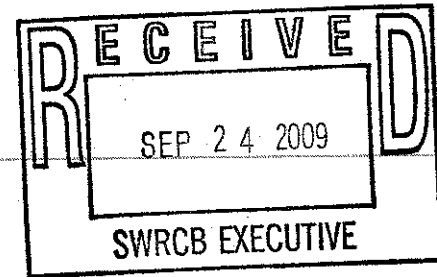


commentletters - Comment Letter - Guadalupe River Watershed Mercury TMDLs

From: <Fleck.Diane@epamail.epa.gov>
To: <commentletters@waterboards.ca.gov>
Date: Wednesday, September 23, 2009 3:26 PM
Subject: Comment Letter - Guadalupe River Watershed Mercury TMDLs



Dear Ms. Townsend:

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to comment on the San Francisco Regional Water Quality Control Board's Basin Plan Amendment to adopt water quality objectives and TMDLs for mercury in the Guadalupe River Watershed. EPA supports the objectives and TMDLs, and urges the State Water Resources Control Board to adopt the Basin Plan Amendment. We thank the Regional Board's staff for their hard work in completing this complicated project, and the Santa Clara Valley Water District for their generous funding of the underlying technical analyses. As part of the development for these TMDLs, we were pleased to be able to provide some early TMDL funding and lab support for fish tissue analyses and air deposition monitoring within the watershed.

We have reviewed both the water quality objectives and TMDLs, and find them appropriate and reasonable. In particular, we support the fish tissue objectives to protect aquatic organisms and piscivorous wildlife in the watershed, including listed threatened and endangered species. We appreciate the Regional Board staff working with the U.S. Fish and Wildlife Service to address their concerns. We agree that the proposed objectives will also protect most human consumers of fish within the watershed.

The TMDL source analysis, numeric targets, linkage analysis, TMDLs, and allocations are all supported with thorough scientific analyses. We support the use of total mercury allocations for mining waste, mercury-laden sediment and stormwater discharges, while using methylmercury allocations for reservoirs and lakes. The science supports the use of both mercury and methylmercury allocations in this instance, to lower fish tissue levels of mercury and restore beneficial uses.

In summary, we support the water quality standards and TMDL package. Please note that this letter is preliminary in nature and does not constitute a determination by EPA under Clean Water Act 303(c) or 303 (d). Approval/disapproval decisions will be made by EPA following adoption of the package and submittal to EPA.

Thank you for the opportunity to comment. If you have any comments or questions, please do not hesitate to contact me.

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