



CITY OF COVINA

125 East College Street • Covina, California 91723-2199

October 26, 2006

Honorable Tam Doduc, Board Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Attn: Song Her, Clerk to the Board



Subject: Comment Letter -- San Gabriel River Metals and Selenium TMDL

Dear Chair Doduc:

The City of Covina submits the following comment on the San Gabriel River Metals and Selenium Total Maximum Daily Load (TMDL) for your consideration.

As quoted in "Environmental Protection" magazine, October 2006, page 6, "Water bodies that do not meet the state water-quality standards are listed as "impaired" under Section 303 (d). The listing then triggers development of a TMDL specifically designed to remove the contaminated river, stream, or lake from the impaired waters list."

Yesterday, your Board took action and approved the proposed 2006 303(d) list. Copper, zinc, and selenium were "delisted" for the San Gabriel River and its tributaries as Board staff concluded that "applicable water quality standards for the pollutants are not being exceeded."

Since the subject TMDL addresses three contaminants that no longer exist and one (lead) that needs further research, the TMDL should be rejected and returned to the Regional Board for revision or cancellation.

Thank you for your consideration of our comment.

Sincerely,

Paul Philips
City Manager

cc: Coalition for Practical Regulation
File