October 26, 2009

San Diego Regional Water Quality Control Board
9174 Sky Park Court Ste 100
San Diego, CA 92123

Subject: TMDL 656901 – Draft CWA Section 305(b), 303(d) 2008 Integrated Report

To Whom It May Concern,

Upon review of the proposed 303(d) listings which have the potential to impact the City of La Mesa, the following inconsistencies were found.

Decision ID 17605 Alvarado Creek Selenium:

- The latitude/longitude coordinates of 32.7831, -117.0748 which are recorded for all the water chemistry samples taken in Alvarado Creek regarding Decision ID 17605/Selenium are not located within, or adjacent to, the Alvarado Creek Channel. This location is consistent with both the SWAMP January 2008 Report, as well as the SWAMP data results available from the http://www.bdat.ca.gov.

- The water quality sample which was taken on 5/18/2004 at 18:50 is non-compliant with the associated Quality Assurance Project Plan (QAPP), according to the SWAMP data results available from the http://www.bdat.ca.gov. This comprises 1 of 4 samples, which were sampled/recorded in an incorrect location, as mentioned above.

Due to the fact that the sole sampling location for all Selenium samples on Alvarado Creek shows an incorrect location which is not within proximity to the waterbody, and has QA/QC issues which invalidates some results; there is serious question as to the validity of the proposed listing. The City of La Mesa recommends not listing Alvarado Creek as beneficial use impaired for Selenium at this time.

Thank you,

Joe Kuhn
Storm Water Program Manager
City of La Mesa