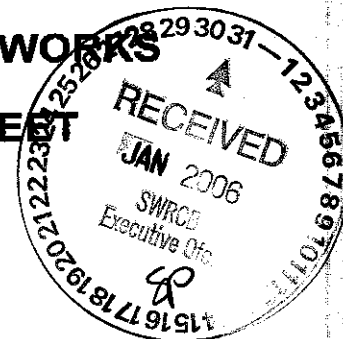


DEPARTMENT OF PUBLIC WORKS
FACSIMILE COVER SHEET

303 (d) Deadline: 1/31/06



Tuesday, January 31, 2006

TO: Selica Potter

COMPANY: State Water Resources Control Board

FAX NO.: (916) 341-5620

RE: Comments on 2006 303(d) List/Request for Delisting - City of Monrovia

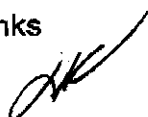
FROM: Louis A. Celaya for David Fike

NUMBER OF PAGES: Cover +6

MESSAGE:
Mr. Potter:

Our comment letter and request for de-listing. We are also sending this via email and US Mail. The facsimile does not include the sampling lab reports as there are numerous pages. Reports will come in US Mail package.

Questions, please call me at (626) 932-5577.

Thanks


Please advise of any discrepancies in Transmission
Telephone: 626-932-5562 OR 626-932-5575

415 S. Ivy Avenue

Monrovia, California 91016-2888

Phone: 626-932-5575
Facsimile: 626-932-5559

City of MONROVIA

Department of Public Works

1887

**VIA FACIMILE/EMAIL/US MAIL**

January 31, 2006

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

Re: Comments on the 2006 303(d) List/Request for Delisting – Monrovia Canyon Creek

Dear Ms. Potter:

The City of Monrovia wishes to express its appreciation for the opportunity to comment on the developed 2006 303(d) list. The document is much improved from the previous efforts as it appears the 2004 adopted "Water Quality Control Policy for Developing the California's Clean Water Act Section 303(d) List" is being implemented. State Board staff is to be commended for what is a difficult and tedious development process.

At this time the City of Monrovia is requesting the State Water Resources Control Board consider re-assessment of the listing of Monrovia Canyon Creek, currently listed as impaired for lead. The basis for this request is outlined below. During the 2002 Clean Water Act Section 303(d) list process, the City of Monrovia commented on the validity of the listing for Monrovia Canyon Creek. During this comment period, the City addressed the issue of using sampling data from the late 1980's (1988) to early 1990's (1994), questionable sampling location outside the limits of the City of Monrovia and change in priority from low to high based solely on the application of TMDL Consent Decree. In the State's response to all commenters during the 2002 Clean Water Act 303(d) list process, the City was provided responses to its submitted comments. In short the City was advised "*In many instances, however the SWRCB and RWQCB received no new data or information about many of the waters. As such the SWRCB has no new evidence to reexamine the 1998 conclusions.*"¹

Since the 2002 Clean Water Act 303(d) list process, the City has embarked on sampling of Monrovia Canyon Creek for the identified pollutant of concern. At this time the City of Monrovia respectfully submits data from 31 samples within Monrovia Canyon Creek for the State Board's

¹ Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments – Response to Comments, October 2002. State Water Resources Control Board – Responses-254, Comment No. G11.12

206 303(d) List Comment Letter
January 31, 2006
Page 2

consideration. The samples were taken from January 2003 to January 2006. In addition to the laboratory reports of the samples taken, also include are: 1) Aerial Map showing sampling locations of Monrovia Canyon Creek during January 2003 to January 2006; 2) Toxic Substance Monitoring Stations 1992-93 - Los Angeles Region (4) Figure Four sheet identifying the closest sampling station to be Station 70 - Peck Road Lake, located in the City of El Monte. This sheet was taken from the Regional Board - Region 4 office's Monrovia Canyon Creek file back in 2002, and was also submitted during the 2002 comment period by the City. Once again the location appears to be where the initial data originated to list Monrovia Canyon Creek.

The State Water Resources Control Board's Water Quality Control Policy for Developing California Clean Water Act Section 303(d) List identifies the California Delisting Factors. Amongst the many factors listed, a listing may be removed based on faulty data, including but not limited to typographical errors, improper quality assurance/quality control procedures, or limitation related to analytical methods that would lead to improper conclusions regarding the water quality status of the segment. Also, by use of binomial distribution, an impaired water body shall be removed from the list if the number of measured exceedences supports rejection of the null hypothesis presented in tables 4.1 of the policy for Developing Clean Water Act Section 303(d) List.

Examination of the sampling data demonstrates that Monrovia Canyon Creek has rejected the null hypothesis presented in table 4.1. This factor should be the primary reason for delisting the water body. Secondly, based on how previous sampling data was derived at a sampling station outside the City limits demonstrates that previous listings were based on faulty data. It should also be noted that this station also serves as a collection point of urban runoff from various local and state neighboring jurisdictions. To presume the collection point is strictly from the Monrovia Canyon Creek water body is an improper and flawed assumption.

Based on this new sampling data, the State's policy for California Delisting Factors, the City of Monrovia respectfully request the State Water Resources Control Board de-list Monrovia Canyon Creek at this time.

Should you have any questions or require additional information, please contact me at (626) 932-5544 or Louis Celaya at (626) 932-5577.

Sincerely,



David Fike
Director of Public Works

cc: City Manager
City Attorney
Senior Management Analyst

NPDES - Canyon Creek Sampling

Monrovia Canyon Creek



CONFIDENTIAL - ACP

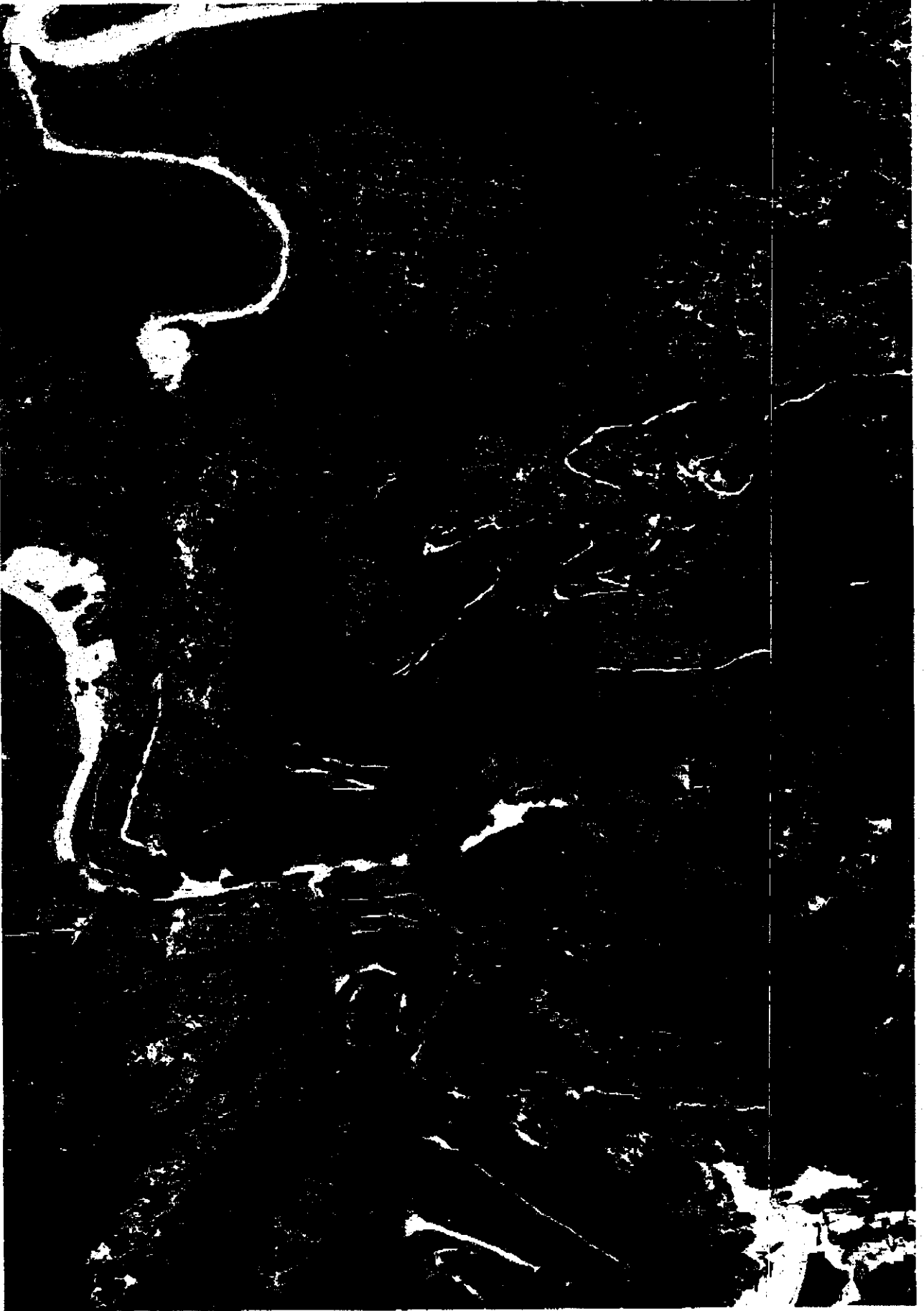
Sample Date	Location 1	Location 2 ug/l	Location 3 ug/l
30-Jan-03		0	0
19-Mar-03		0	0
27-May-03		0	0
24-Jun-03		0	0
30-Jul-03		0	0
19-Aug-03		0	0
23-Sep-03		0	0
22-Oct-03		0	0
25-Nov-03		0	0
23-Dec-03		0	0
28-Jan-04		0	0
25-Feb-04		0	0
16-Mar-04		0	0
15-Apr-04		0	0
18-May-04		0	0
29-Jun-04		0	0
2-Nov-04		0	0
7-Dec-04		0	0
5-Jan-05		0	0.71
2-Feb-05		0	0
2-Mar-05		0	0
15-Apr-05		0	0
11-May-05		0	0
8-Jun-05		0	0
7-Jul-05		0	0
3-Aug-05		0	0
7-Sep-05		2.6	0
6-Oct-05		0	0
2-Nov-05		0	0
7-Dec-05		0	0
4-Jan-06		0	0
	1.81	2.6	0.71

Median	0	0	0
Sampling Avg	0.06	0.09	0.02
	0	0	0
Location Avg - All	0.000	0.000	0.000
Location Median - All	0.000	0.000	0.000

BINOMDIST	Location 1	Location 2	Location 3
	1.00	1.00	1.00

0 - Non Detect
Green Columns Indicates Down Stream from Monrovia Canyon Creek

**Monrovia Canyon Park (Aerial Photo)
Monrovia Canyon Creel - Sampling Locations: 1, 2, 3**



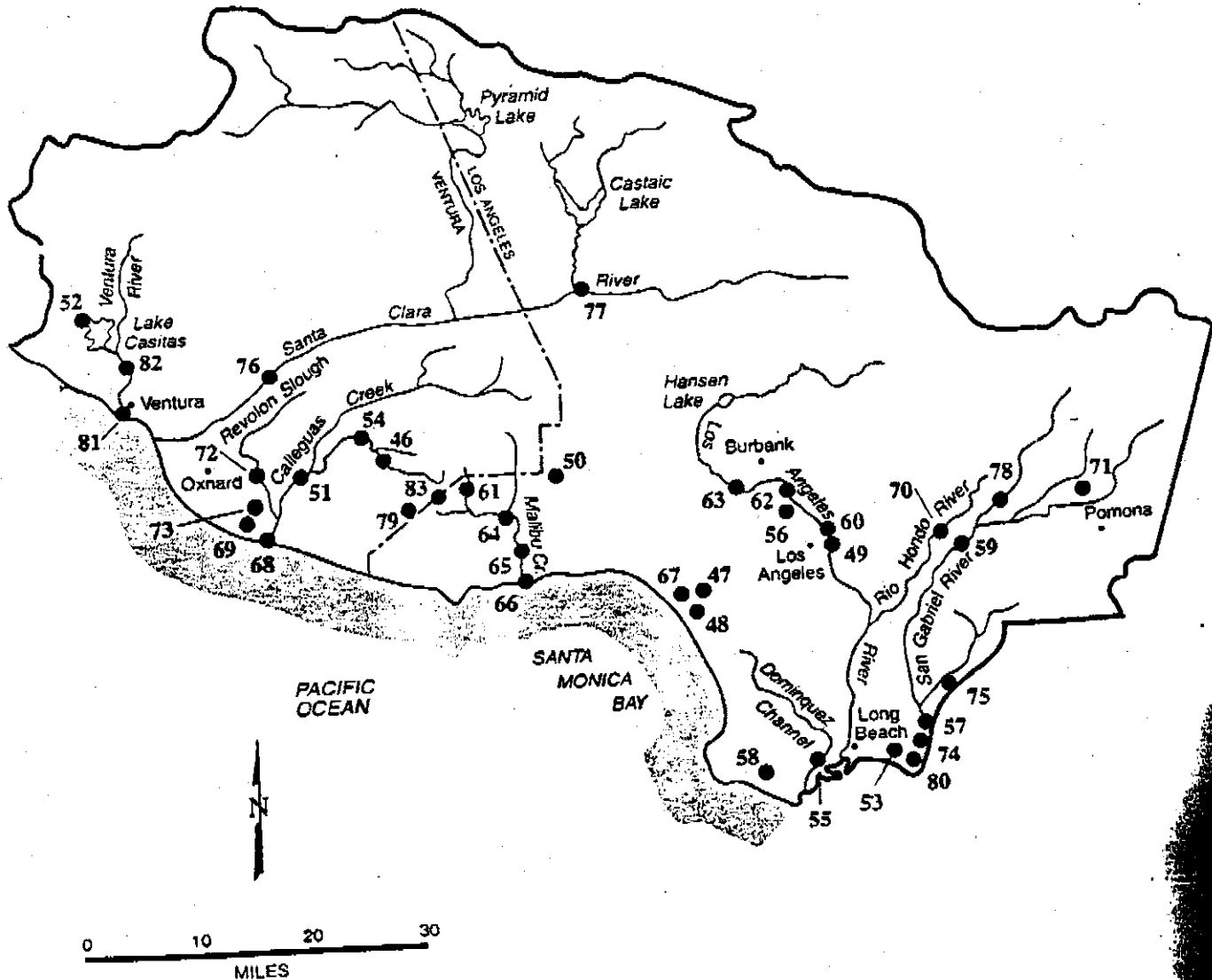
Monrovia Canyon Creek plot is best estimate based on staff's knowledge of terrain with-
out use of GIS. Blue - Monrovia Canyon Creek; Orange - Saw Pit Creek

Figure 4. TSMP Monitoring Stations 1992-93 - Los Angeles Region (4)

LOS ANGELES HYDROLOGIC BASIN PLANNING AREA (LA)
SANTA CLARA AND LOS ANGELES RIVER BASINS

- 46 Arroyo Conejo/d/s Forks
- 47 Ballona Creek
- 48 Ballona Wetlands
- 49 Belvedere Park Lake
- 50 Calabasas Lake
- 51 Calleguas Creek
- 52 Casitas Lake
- 53 Colorado Lagoon
- 54 Conejo Creek
- 55 Dominguez Channel
- 56 Echo Park Lake
- 57 El Dorado Park Lake
- 58 Harbor Park Lake
- 59 Legg Lake
- 60 Lincoln Park Lake
- 61 Lindero Lake
- 62 Los Angeles River/Los Feliz Road
- 63 Los Angeles River/Sepulveda Basin
- 64 Malibou Lake

- 65 Malibu Creek/Tapia Park
- 66 Malibu Lagoon
- 67 Marina del Rey
- 68 Mugu Lagoon
- 69 Oxnard Drainage Ditch 2
- 70 Peck Road Lake
- 71 Puddingstone Reservoir
- 72 Revolon Slough
- 73 Rio de Santa Clara/Oxnard Drain
- 74 San Gabriel River
- 75 San Gabriel River/Coyote Creek
- 76 Santa Clara River/Santa Paula
- 77 Santa Clara River/Valencia
- 78 Santa Fe Dam Park
- 79 Sherwood Lake
- 80 Simms Pond
- 81 Ventura River Estuary
- 82 Ventura River/Oaji
- 83 Westlake Lake



APPENDIX B (continued)
Toxic Substances Monitoring Program
1992-93 Station Descriptions

Station Number	Station Name	County	Description
405.15.99	Lincoln Park Lake	Los Angeles	Station located in the City of Los Angeles approximately two miles northeast of Union Station.
405.21.03	Calabasas Lake	Los Angeles	Station located at Park Serrano off Park Granada in Calabasas.
405.21.06	Los Angeles R/Los Feliz Rd	Los Angeles	Station located below Los Feliz Bridge.
405.21.16	Los Angeles R/Sepulveda Basin	Los Angeles	Station located east of Highway 405 at Burbank Blvd.
405.41.01	Legg Lake	Los Angeles	Station located in the western quarter of the northern end of Legg Lake in the Whittier Narrows Recreational Area.
405.41.08	Peck Road Lake	Los Angeles	Station located in the western end of the lake.
405.41.11	Santa Fe Dam Park	Los Angeles	Station located around margins and islands.
405.52.01	Puddingstone Res	Los Angeles	Station located from the middle cove on the west shore and from the inlet cove on the northeast shore.
508.10.42	Sacramento R/Keswick	Shasta	Station located about 1/2 mile above the railroad bridge over Lake Redding.
510.00.30	Sacramento R/Hood	Sacramento/Yolo	Station located in the river stretch from Clarksburg to Courtland along the Sacramento/Yolo County line.
519.21.09	American R/d/s Watt Ave Brg	Sacramento	Station located between the Howe Avenue and Watt Avenue Bridges in Sacramento.
519.22.90	Feather R/d/s HWY 99 Brg	Sutter/Yuba	Station located from 1/2 mile below the Highway 99 Bridge and upstream to the confluence with the Bear River.
541.20.07	Salt Slough	Merced	Station located upstream of bridge on Highway 165.
541.20.16	Mud Slough	Merced	Station located on Highway 140, 1/2 mile north of Kesterson National Wildlife Refuge.
544.00.90	San Joaquin R/Mossdale	San Joaquin	Station located 1 1/2 miles upstream Mossdale launch ramp.
553.44.01	Lake Kaweah	Tulare	Station located in the center of this lake.
558.90.08	Kern R/Bakersfield	Kern	Station located at the east end of Hart Park on Alfred Harrell Road off Highway 178 east of Bakersfield.
601.00.92	June Lake	Mono	Station located in entire marginal area of lake.