



7/15/08 Bd Mtg. Item 10
Chollas Creek Metals TMDL
Deadline: 7/7/08 by 12 p.m.

California Stormwater Quality Association
Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

July 7, 2008

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board

Subject: Consideration of a Resolution approving an amendment to the Water Quality Control Plan for the San Diego Basin (Basin Plan) to incorporate Total Maximum Daily Loads for dissolved copper, lead, and zinc in Chollas Creek, Tributary to San Diego Bay

Dear Ms. Townsend:

The California Stormwater Quality Association (CASQA)¹ thanks the State Water Resources Control Board (State Water Board) for this opportunity to comment on the proposed resolution. We have two comments. First, CASQA strongly encourages the State Water Board to agree to the City of San Diego's request² that the subject resolution include similar considerations regarding indirect atmospheric deposition adopted by the State Water Board last month in the Los Angeles River Metals TMDL Resolution (2008-0046). Second, we believe it is important for the State Water Board to know that the City of San Diego is one of over 200 local governments throughout California addressing separate metals/copper listings/TMDLs in which urban runoff has been identified as a significant pathway, including in the San Francisco Bay Area, as well as seven major urban watersheds in Sacramento, Ventura, Los Angeles, Orange, and San Diego counties. According to extensive research, funded in large part by a State Water Board Proposition 13 grant, copper from brake pad wear is estimated to be the largest source of copper releases in highly urbanized watersheds. To help address the copper portion of these listings/TMDLs in a consistent way across the state, CASQA formed a "Brake Pad Partnership (BPP) Team", comprised of representatives from the affected local governments, to develop comprehensive, long term control measures to address copper impairments caused by brake pad wear debris. The City of San Diego was an early adopter of this approach and continues to be a proactive participant in the CASQA BPP Team.

We thank you again for the opportunity to comment. If you have questions, please contact me.

Sincerely,

Geoff Brosseau, Executive Director

cc: CASQA Board of Directors, Executive Program Committee, and Brake Pad Partnership Team

¹ CASQA is composed of stormwater quality management organizations and individuals, including cities, counties, special districts, industries, and consulting firms throughout California. Our membership provides stormwater quality management services to over 26 million people in California and includes most every Phase I and many Phase II municipal programs in the State. CASQA was formed in 1989 to recommend approaches for stormwater quality management to the State Water Resources Control Board.

² City of San Diego Comments Letter – San Diego TMDL for Dissolved Copper, Lead and Zinc in Chollas Creek; July 7, 2008; City of San Diego