

# CITY OF INDUSTRY

Incorporated June 18, 1957

October 27, 2006

Attn: Song Her, Clerk to the Board  
Honorable Tam Doduc, Board Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



**Subject: Comment Letter Regarding the San Gabriel River Metals TMDL**

Chair Doduc:

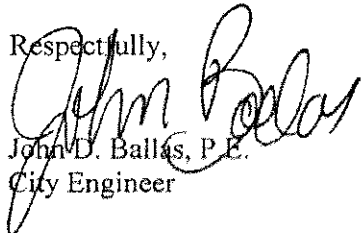
I am submitting the following comments regarding the San Gabriel River Metals TMDL for the City of Industry. While we agree with the Board's water quality goals, regulations must be based on sound science and implemented in a practical, achievable and cost-effective manner. The sources of many runoff-borne metals, are beyond the regulatory control of local government and the iterative approaches required to remove them are either expensive or do not achieve California Toxics Rule (CTR) standards.

The City of Industry agrees and supports the information provided to the Los Angeles Regional Water Quality Control Board (LARWQCB), by the Coalition for Practical Regulation (CPR) speaker group and its special counsel Richard Montevideo, as well as the information provided by the City of Downey.

The City of Industry requests that the State Board remand the San Gabriel River Metals TMDL to the Regional Board to correct the many deficiencies noted in the above referenced letters and await your final adoption of the 2006 303(d) list, which differs significantly from the TMDL. The Regional Board should conduct the required technical studies, Porter-Cologne analyses, and prepare a Master EIR to accompany the TMDL. The City of Industry is contributing to improving water quality by enforcing the SUSMP requirements on new development and conducting numerous construction, industrial and commercial inspections. The State and Regional Boards need to undertake the necessary studies, to define the combined adverse impacts from the many proposed TMDLs and conduct a Master EIR to determine the combined cost of the implementation programs.

Thank you for your consideration of our comments.

Respectfully,

  
John D. Ballas, P.E.  
City Engineer

c: Eduardo Pereira, CNC Engineering, Inc.  
Richard Walker, CNC Engineering, Inc.  
Michael Kolbenschlager, AEI-CASC Engineering, Inc.  
Gary W. LaForge, AEI-CASC Engineering, Inc.