



Inland Empire Waterkeeper

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February 28, 2007

Pavlova Vitale
Santa Ana Regional Water Quality Control Board
3737 Main St., Suite 500
Riverside, CA 92501

Subject: Comments for the 2008 303(d) List of Water Quality Limited Segments

Dear Ms. Vitale,

Inland Empire Waterkeeper (IEWK) is the newly formed chapter of Orange County Coastkeeper (OCCK) whose purpose is to advocate on behalf of the upper Santa Ana River Watershed. As such, we are submitting herein the results that pertain to waterbodies in the upper Santa Ana River Watershed, which were identified by OCCK's recent monitoring efforts. OCCK will be submitting their findings for waterbodies in Orange County separately.

The findings below come from the Santa Ana River Watershed Citizen Monitoring Project, and the Orange County Coastal Watersheds Monitoring Project. Since the databases, QAPP's, and Final Reports from these projects are already in your possession, they are not included with this letter. After analyzing the data from both projects in accordance with the current state guidelines for developing 303(d) listings, we found a sufficient number of samples exceeding USEPA recommendations for *E. Coli* (235 mpn/100 ml for a single sample/126 mpn per 100ml for a geometric mean). The geometric mean for this purpose is all *E. Coli* measurements for the stream for the entire project duration. Please see the attached spreadsheet for details.

The following waterbodies should be considered for listing in the 2008 impaired waters list for impairment of recreational use by *E. Coli*.

- Golden Star Creek, (per monitoring sites 1 and 2)
- Temescal Creek, (per monitoring sites 1, 2, and 3)

OCCK and IEWK believe the data submitted to the Regional Board for the above-mentioned waters is complete and accurate for listing purposes. It meets the guidelines detailed in the project QAPP's and SWAMP guidelines. All of the quality control data to back up the recommendations is available. We will be glad to assist the Regional Board in reviewing the data if there are any questions regarding its development or quality. Thank your for the opportunity to submit our comments on this important issue.

Sincerely,

Mandy Revell
Director and Waterkeeper