

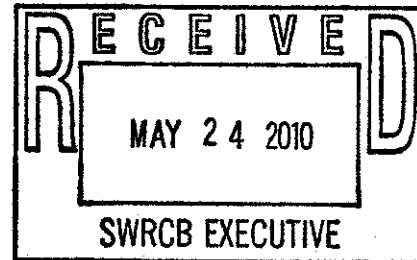


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San Diego Chapter
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May 24, 2010

Ms. Jeanine Townsend Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Subject: Comment Letter- Phase II 1 Sediment Quality Objectives

Dear Members of the Board:

The Sierra Club San Diego Chapter has reviewed the Staff CEQA Scoping Informational Document for the Phase II Sediment Quality Objectives dated April 21, 2010. We wish to submit these following comments.

Section 6.3.1. Tissue Chemistry. The measurement of contaminant concentration in fish tissue does not state explicitly whether it is with the skin on or off. The concentration of lipophilic contaminants in fish tissue is higher than with the skin taken off because the skin contains lipids. Because fish are often grilled with the skin on the measurement of contaminant should be with the skin on. OEHHA sets fish advisories base on tissue concentrations with the skin off. Measuring fish tissue contaminant concentration for as one of the indirect assessment tools should be with the skin on because this provides a higher level of protection for human health.

Section 6.3.3. The discussion on fish target selection should make it clear that this Phase is to develop sediment quality objectives based on fish that are predominantly benthic feeders. Fish at the higher trophic levels are not

That concludes my comments. Thank you.

Sincerely,

Edward Kimura
Chair Water Committee
Sierra Club San Diego Chapter