

Comments on the Proposed Amendment to the Los Angeles Region Basin Plan to Incorporate a Los Angeles River Bacteria TMDL

Presented by

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On Behalf of the Cities of
Downy, Signal Hill and South Gate

State Water Resources Control Board Hearing
November 1, 2011
Sacramento, CA

Significant environmental
issues not adequately
addressed in response to
comments

Policy question:

- In Reaches 1 and 2, REC uses in the river channel are prohibited
- Fire department swift water rescues occur annually



Source: *Los Angeles Times*, June 24, 2010



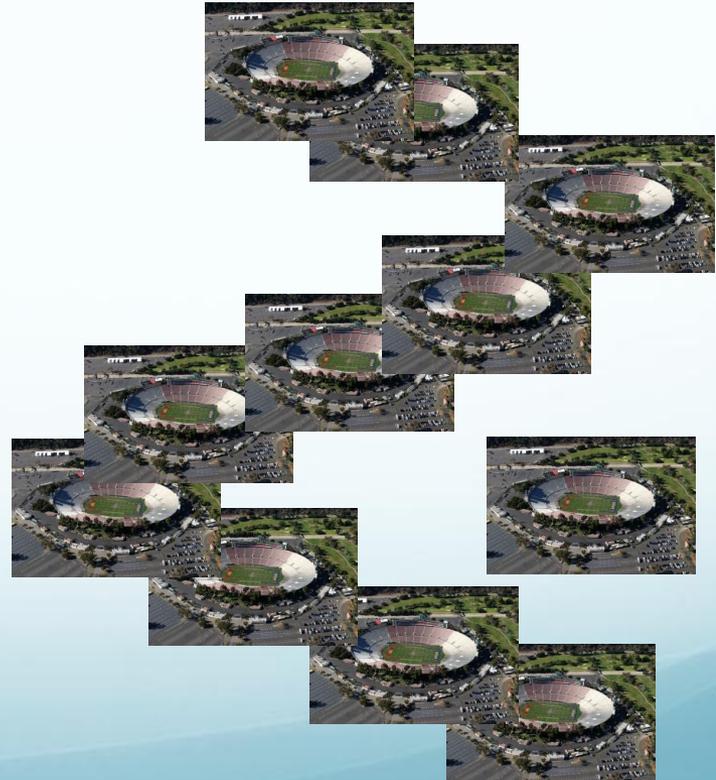
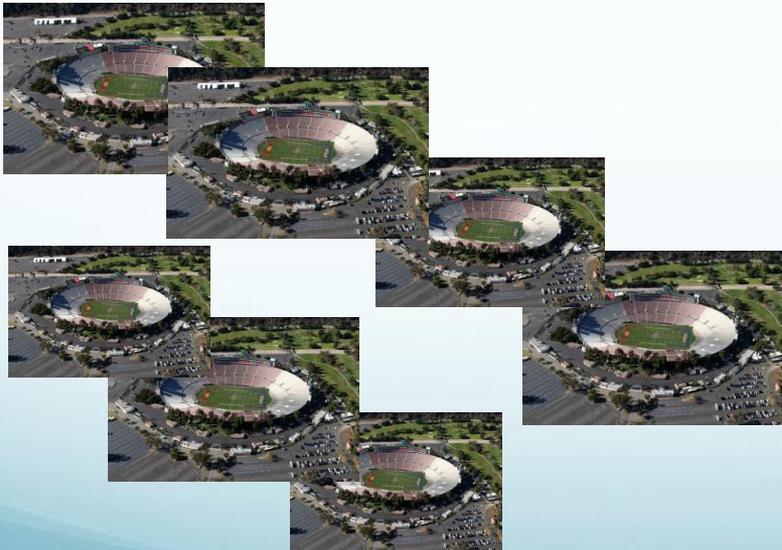
Other outstanding Issues

- TMDL's approach to **natural/uncontrollable sources** is inadequate, and even full implementation is unlikely to result in attainment
- There are **no known means of compliance for wet weather conditions**
- TMDL is **unaffordable and unworkable**, and **benefits do not justify expenditures**

Wet weather compliance

Using data from WY 2005, with HFS and allowable exceedances:

- Arroyo Seco: 570 million gallons per day (7 Rose Bowls)
- Los Angeles River: 924 mgd (11 Rose Bowls)



TMDL is costly and unworkable

- Regional Board's cost estimate is **\$5.4 billion**
- Board's response to community: there is flexibility and a long enough compliance schedule. But compliance points start 2.5 years after effective date

Alternatives not addressed

- Responses to comments referred to a 31-year implementation period developed by CREST.
- But that is only for dry weather.

Wet Weather

- Wet weather is far more problematic
- Reasonable alternatives were not considered in the SED

Conclusions

- State Water Board should defer approval at this time
- Standards changes should be evaluated before TMDL development and adoption
- Re-evaluate REC-1 and REC-2 in the LA River