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October 19, 2012

Mr. Richard Booth
Chief, TMDL/Basin Planning Unit
California Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Dear Mr. Booth:

Subject: Comment Letter – Triennial Review of the Water Quality Control Plan for the Lahontan Region

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit comments on the triennial review of the Water Quality Control Plan for the Lahontan Region (Basin Plan). LADWP supports Lahontan's Water Quality Control Plan and recognizes its importance in protecting beneficial uses; and submits the following comments:

Hot Creek Water Quality Objectives

LADWP supports the development of revised objectives for Hot Creek, to account for changed naturally-occurring pollutant concentration levels in natural groundwater flows. This would be in line with the Lahontan Regional Water Quality Control Board (RWQCB) policy regarding natural background conditions where concentrations are higher than the beneficial use protective water quality limit. RWQCB has stated that "their authority for protection of water quality from waste discharges is limited to regulation of 'controllable water quality factors' – those actions, conditions, or circumstances resulting from human activities that may influence the quality of waters of the state and that may be reasonably controlled. Where the natural background level is higher than the beneficial use protective water quality limit, the natural background level is considered to comply with the water quality objective. In such cases, other controllable factors are not allowed to cause any further degradation of water quality."

Freshwater Bacterial Objective Revision

LADWP supports Option 2 of the Fact Sheet, in which site specific objectives of 200 colony forming units (CFUs) of E. coli per 100 milliliters (ml) would be used for Bridgeport Valley; then in a second phase, other areas within the Lahontan Region

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Mr. Richard Booth
Page 2
October 19, 2012

would be considered for standard changes as the State Board or USEPA conducts their own actions on this subject. For the second phase, LADWP recommends that all waterbodies within the Lahontan Region be assigned the objective of 200 CFU of E. coli per 100 ml objective; with future data collection, by Waste Discharge Requirement (WDR) permit holders, to be used to reevaluate the objective when needed. This will allow for consistency throughout the Region and State as soon as possible, and allow for antidegradation concerns to be addressed when necessary.

If there are any questions, please contact Mr. Clayton Yoshida of the Wastewater Quality and Compliance Group at 213-367-4651.

Sincerely

A handwritten signature in cursive script, appearing to read "Katherine Rubin".

Katherine Rubin
Manager of Wastewater Quality and Compliance

CY:lr

c: Mr. Clayton Yoshida