



City of Commerce

Office of the
City Administrator

March 16, 2015

Via electronic mail

California Regional Water Quality Control Board
Los Angeles Region
ATTN: Jenny Newman
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

SUBJECT: Comments on the Proposed Amendment to the *Water Quality Control Plan - Los Angeles Region (Basin Plan)* to Adopt Site-Specific Objectives for Lead and Copper in the Los Angeles River Watershed and to Revise the Total Maximum Daily Load (TMDL) for Metals in the Los Angeles River and Tributaries

Dear Ms. Newman:

The City of Commerce values the opportunity to provide comments on the Proposed Amendment to the *Water Quality Control Plan - Los Angeles Region (Basin Plan)* to Adopt Site-Specific Objectives for Lead and Copper in the Los Angeles River Watershed and to Revise the Total Maximum Daily Load (TMDL) for Metals in the Los Angeles River and Tributaries. The City of Commerce appreciates the efforts of the Los Angeles Regional Water Quality Control Board (Regional Board) staff to consistently and thoughtfully engage during study development and implementation. The City of Commerce joined with over 30 other cities, the County of Los Angeles, and the California Department of Transportation (Caltrans) over seven years ago to identify special studies to improve our understanding the watershed and support implementation efforts to reduce the effects of urban runoff on water quality. As part of those efforts, the studies that form the basis of the proposed amendments were identified as an appropriate step in ensuring the latest science specific to our watershed is applied.

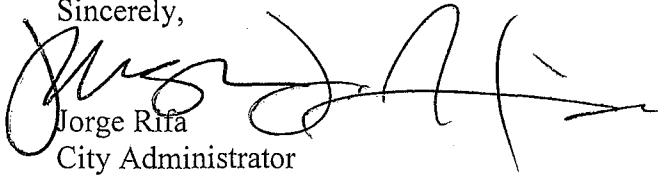
Based on the available data, we are concerned that we will not be able to consistently meet the interim and final TMDL limits in our MS4 Permit at this time. However, the results of the studies demonstrate that the current TMDL targets for copper and lead can be revised without adversely affecting the beneficial uses. The revised targets will still be as protective as intended by the TMDL. The development of information to support this determination occurred through a thorough scientific review process that included Regional Board staff and an independent Technical Advisory Committee. The copper WER and lead recalculation studies followed established USEPA methods and were applied as intended when the California Toxics Rule (CTR) was promulgated.

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A significant number of the watershed's communities and census tracts are identified by the State of California as communities with an annual Median Household Income (MHI) that is less than 80% of the Statewide MHI. This includes [portions of] our community. As such, it is important that our limited resources are used as effectively as possible. By adopting appropriately developed site-specific objectives and corresponding changes to the TMDL, the Regional Board helps to protect our financially challenged communities from the implementation of an unnecessary level of control measures. This in turn allows us to focus on other issues in the watershed, such as the Los Angeles River Bacteria TMDL and the reduction of or capture and beneficial reuse of urban runoff.

The City of Commerce appreciates the Regional Board's consideration and adoption of the proposed amendments with the incorporation of the detailed technical comments provided by the Los Angeles River Watershed Metals TMDL Steering Committee.

Sincerely,



Jorge Rifa
City Administrator