



City of Signal Hill

2175 Cherry Avenue ♦ Signal Hill, CA 90755

March 5, 2015

VIA ELECTRONIC MAIL

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

Re: 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 Signal Hill is providing the following 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 appreciates the efforts of the Regional Board staff to assist the cities, Los Angeles County and Caltrans during the study development and implementation. We are very appreciative of the efforts of Ms. Jenny Newman, who has been our key contact for the special studies over the course of the last five years.

Signal Hill joined with 32 cities, Los Angeles County and Caltrans over seven years ago to identify special studies to improve our collective understanding of the watershed and to support implementation of 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 application of the latest science to the watershed.

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 Permits at this time. However, the results of the scientific studies demonstrate that TMDL targets for copper and lead can

be revised without adversely affecting the beneficial uses of the river and tributaries. The revised targets will be as protective as intended by the TMDL.

The development of information to support this determination was the result of a rigorous scientific review process that included the Regional Board staff and an independent Technical Advisory Committee of nationally recognized scientists. The copper WER and lead recalculation studies followed the established U.S. Environmental Protection Agency methods and were applied as intended under the California Toxics Rule requirements.

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. A portion of our community is designated under CESII by the State of California is meeting this definition. 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 and households from the implementation of an unnecessary level of control measures. This in turn allows us to focus on other issues within the watershed, such as the Los Angeles River Bacteria TMDL and the reduction of or capture and beneficial reuse of urban runoff.

Signal Hill appreciates the Regional Board's consideration and adoption of the proposed amendments with the incorporation of the technical comments provided by the Los Angeles River Metals TMDL Steering Committee outlined in separate letter to the Regional Board.

Sincerely,



Edward H.J. Wilson
Mayor

cc: City Council
City Manager
Deputy City Manager
Public Works Director