

Artesia  
Bellflower  
Cerritos  
Diamond Bar  
Downey  
Hawaiian Gardens  
La Mirada  
Lakewood  
Long Beach  
Norwalk  
Pico Rivera  
Santa Fe Springs  
Whittier

## Lower San Gabriel River Watershed Committee

May 18, 2015

ATTN: Kangshi Wang  
California Regional Water Quality Control Board  
Los Angeles Region  
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Los Angeles, California 90013

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### Comment Letter- SGR Bacteria TMDL

The Lower San Gabriel River (LSGR) Watershed Committee<sup>1</sup> appreciates this opportunity to provide comments regarding the pending San Gabriel Bacteria TMDL. The LSGR Watershed committee's comments<sup>2</sup> are:

The compliance strategy in the proposed TMDL is broad and allows Permittees flexibility to follow various implementation strategies, which the LSGR Watershed Committee appreciates. But it should be noted that the Watershed Management Program (WMP), which was recently approved by the Regional Board, and Coordinated Integrated Monitoring Program (CIMP), which has been revised and re-submitted to the Regional Board for approval, recognized and established bacteria (e. Coli) as a category 2 water quality priority. The LSGR Watershed Committee established the same water quality objectives as contained within the proposed TMDL and has already established as a category 2 water quality priority and the WMP has already established a timeline and the development of watershed control measures to reduce bacteria levels. This included the potential need for "adaptive management" to achieve the bacteria targets. As the WMP involved an extensive development and watershed modeling, bacteria should remain as a category 2 pollutant at least until the first adaptive management review is completed.

Recognizing that the Regional Board is likely to adopt this TMDL, as it has similarly done for the Ballona Creek and Los Angeles River watersheds, the need for a longer compliance periods is demonstrated by the need for a Time Schedule Order (TSO) for the Ballona Creek Bacteria TMDL. That TMDL was originally adopted by the Regional Board on June 8, 2006. The TSO found that, despite past and ongoing efforts by the Ballona Creek Permittees, additional implementation time was necessary. Bacteria are very difficult to control, and compliance with wet-weather standards is likely to take many years, especially if widespread stormwater capture is required. It is therefore suggested by the LSGR Watershed Committee, that a similar TSO

<sup>1</sup> The LSGR does not extend into the SGR Estuary and these comments do not necessarily apply to that waterbody.

<sup>2</sup> These comments do not reflect those of the Los Angeles County Flood Control District which will be submitting comments separately

would likely be necessary if the TMDL deadlines are adopted as proposed. Rather than adopting a timeline that would knowingly result in the need for a TSO in approximately 10 years, the compliance period should be extended from the proposed 10 and 20 years to 15 to 25 years.

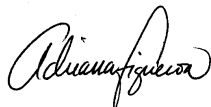
While the LSGR Watershed Committee appreciates the Regional Board's efforts to protect existing and potential REC1 and REC2 uses, public entry to the San Gabriel River and Tributaries within the LSGRs area is restricted and therefore REC1 and REC 2 use standards are not appropriate.

There are large stretches of the San Gabriel River within the LSGR jurisdictional area that are dry during the dry-season. This area is the soft-bottom channel extending from Firestone Boulevard upstream to Whittier narrows. That should be recognized in the TMDL and that monitoring and dry-weather targets will not be applicable when there is no measurable flow in the main channel.

The proposed standards establish compliance standards based on daily or weekly sampling. Sampling at this frequency may be appropriate where frequent human contact occurs, such as beaches; but in the case of the Lower San Gabriel River and its tributaries, the concrete walls and fences along the channels coupled with legal prohibitions against entry into the channels will prevent the vast majority of water contact. In the case of the LSGR, the proposed TMDL should recognize that the proposed sampling frequency in the CIMP will be sufficient, at least through the WMP's 35 percent milestone of 2020. And finally, there is no need for the preparation and submittal of a separate monitoring plan just for bacteria, supplemental review of bacteria monitoring can be addressed as needed through the adaptive management process.

Thank you for your time and consideration,

Sincerely

A handwritten signature in black ink, appearing to read 'Adriana Figueroa', with a stylized, cursive script.

Adriana Figueroa, Chair  
Lower San Gabriel River Watershed Committee