

CITY OF HAWTHORNE



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Department of Public Works, Engineering Division

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Mr. Sam Unger, Executive Officer
California Regional Water Quality Control Board, Los Angeles Region
320 W. 4th Street, suite 200
Los Angeles California 90013

February 14, 2100

Attention: Ms. Thanhloan Nguyen
Tnguyen@waterboards.ca.gov

Subject: Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters
Toxic Pollutant TMDL.

Dear Mr. Unger:

Thank you for extending the comment period for this TMDL and taking the time to hold and attend the February 7th workshop on this extremely complex TMDL. As one of the many municipalities that will be impacted by this TMDL, the City of Hawthorne has the following comments.

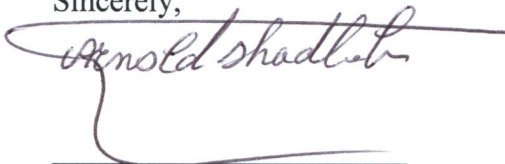
1. This is probably the most technically complex TMDL the Regional Board has issued to date and as such, flexibility needs to be built into the compliance tasks, deadlines and limits. Specifically, the interim compliance limits for the freshwater portion of the Dominguez Channel need to be adjusted to take into account the current conditions and sampling data outliers that will undoubtedly occur in future monitoring. It is recommended that the interim limits not be enforceable until the permittees have initiated and completed a special study, in consultation with Regional Board staff, to review the first several years of monitoring data (the time period is to be established in consultation with the Regional Board staff and other affected MS4 permittees).
2. Page 104 of the staff report includes the City of Hawthorne among the Responsible Parties for the Dominguez Channel, Torrance Lateral and Dominguez Channel Estuary. The Tentative Basin Plan Amendment only establishes WLAs for Hawthorne for the freshwater portion of the Dominguez Channel. Hawthorne requests the Regional Board acknowledge that only the Dominguez Channel Freshwater WLA's apply to Hawthorne.

3. Page 27 of the Tentative Basin Plan Amendment calls for the MS4 permittees to develop a Sediment Management Plan to address contaminated sediment in the Dominguez Channel and Dominguez Channel Estuary. For other existing sediment beds covered by this TMDL, including the Los Angeles River estuary, the cities and ports of Los Angeles and Long Beach and the State Lands Commission are explicitly listed as responsible agencies. However, for the Dominguez Channel and Estuary it appears that the MS4 dischargers would all be jointly responsible for this material. In addition, there are no sediment WLAs assigned to permittees discharging to the freshwater portion of the Dominguez Channel; therefore these cities should not be included in this requirement.
4. A typographical error is noted for the interim goals for lead on page 10 which are set lower (35.8) than the final goals on page 11 (39.3) and this needs to be corrected.

Finally, the Dominguez Channel Watershed Management Committee as well as other affected municipalities will be submitting comments as well and we trust those comments will be given serious consideration by your office.

Thank you for this opportunity to comment. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Arnold Shadbehr". The signature is written in black ink and is positioned above a horizontal line.

Arnold Shadbehr, P.E.
Director of Public Works/City Engineer