



Via E-mail to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

January 16, 2014

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

**Subject: Comment Letter – Implementation Plans and Schedules for the Los Cerritos Channel Metals TMDL and the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL**

Dear Ms. Townsend:

I am writing on behalf of the City of Lakewood. Our City is partially in the Los Cerritos Channel Watershed and partially in the San Gabriel River Watershed. We participate actively on the Los Cerritos Channel Watershed Group (Watershed Group) and the Lower San Gabriel River Watershed Committee (Watershed Committee). We appreciated the Los Angeles Regional Water Board's willingness to move forward with amendments to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to incorporate Implementation Plans and Schedules for the Metals TMDLs for the Los Cerritos Freshwater Channel and the Total Maximum Daily Loads for Metals and Selenium San Gabriel River and Impaired Tributaries. The adoption of Implementation Plans with Implementation Schedules is essential because these TMDLs were established by USEPA and EPA does not adopt implementation plans and schedules for TMDLs that they establish. Such plans and schedules are needed for realistic implementation of TMDLs, especially complex TMDLs such as metals TMDLs where sources are both direct and indirect and many of the sources are beyond the abilities of local governments to control.

We also appreciate the Regional Water Board's recognition of pollution prevention, including true source control, in Findings 20 and 21. Both Watersheds have concluded that the most effective strategy for addressing water quality impairments in water bodies will be one based initially on a combination of source control (especially true source control), runoff reduction, and soil stabilization. The Watersheds based this conclusion on the fact that if pollutants are not generated or released, they will not be available for transport to receiving waters, and if dry-weather runoff can be eliminated or greatly reduced, a major transport mechanism will be eliminated or greatly reduced. The result of both of these measures will be that many fewer pollutants will reach the receiving waters.

We further appreciate the provision in the Basin Plan Amendment that, subject to Executive Officer approval, if our forthcoming Watershed Management Programs

# Lakewood

Comment Letter - Implementation Plans and Schedules for the Los Cerritos Channel  
Metals TMDL and the San Gabriel River and Impaired Tributaries Metals and Selenium  
TMDL

January 16, 2014

Page 2 of 2

(WMPs) demonstrate that control measures and BMPs will achieve wet-weather water quality-based effluent limitations (WQBELs) consistent with the schedule in Tables 7-20.2 and 7-32.2, then compliance with wet-weather WQBELs may be demonstrated by implementation of these control measures and BMPs. Our City supports the decision of the Watershed Group and the Watershed Committee to proceed with development of WMPs. The Reasonable Assurance Analysis required for a WMP will give us the opportunity to demonstrate that our programs of source control, runoff reduction, and soil stabilization, supplemented by LID, Green Streets, and other structural improvements, will achieve wet-weather water WQBELs consistent with the schedules in Tables 7-20.2 and 7-32.2.

The City of Lakewood supports the detailed comments submitted under separate cover by the Los Cerritos Channel Watershed Group. We made similar comments supporting the Basin Plan Amendment to the Los Angeles Regional Water Board, and urge you to approve the Final Basin Plan Amendment adopted by the Los Angeles Regional Water Quality Control Board.

If you have any questions concerning these comments please contact Ms. Konya Vivanti, Senior Management Analyst at (562) 866-9771 ext. 2507 or [kvivanti@lakewoodcity.org](mailto:kvivanti@lakewoodcity.org).

Sincerely,



Lisa Ann Rapp  
Director of Public Works