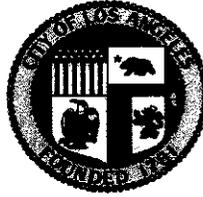


CITY OF LOS ANGELES
CALIFORNIA



ANTONIO R. VILLARAIGOSA
MAYOR

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF SANITATION

ENRIQUE C. ZALDIVAR
DIRECTOR

VAROUJ S. ABKIAN
ADEL H. HAGEKHALIL
ALEXANDER E. HELOU
TRACI J. MINAMIDE
ASSISTANT DIRECTORS

1149 SOUTH BROADWAY STREET, 9TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-2210
FAX: (213) 485-2979

BOARD OF
PUBLIC WORKS

COMMISSIONERS

CYNTHIA M. RUIZ
PRESIDENT

VALERIE LYNNE SHAW
VICE PRESIDENT

PAULA A. DANIELS
PRESIDENT PRO TEMPORE

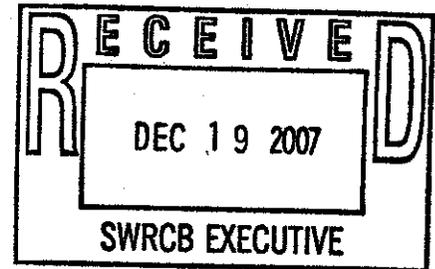
ERNESTO CÁRDENAS

JULIE B. GUTMAN

December 19, 2007

Ms. Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Townsend:



Subject: COMMENT LETTER – LOS ANGELES REGION AMMONIA SITE-SPECIFIC WATER QUALITY OBJECTIVE

These comments are being submitted on behalf of the City of Los Angeles' Bureau of Sanitation (Bureau). In conjunction with the County Sanitation Districts of Los Angeles County (Districts) and the City of Burbank, the Bureau was able to participate in the development of the Ammonia Site-Specific Objectives (SSOs) with the Los Angeles Regional Water Quality Control Board (Regional Board) staff. The Bureau fully supports the approval of the amendment under consideration by the State Water Resources Control Board (State Water Board).

The Bureau believes that the collaborative process that was used to develop the SSOs, including independent technical review by a separate Technical Advisory Committee (TAC) and a stakeholder committee made up of a wide variety of interests in the watersheds, resulted in technically sound ammonia SSOs for the Los Angeles Region. The continuous participation of the TAC, Regional Board staff and stakeholders resulted in SSOs that are protective of the beneficial uses in these waterbodies.

The SSOs were developed using US EPA guidelines that acknowledge that site specific conditions in local waterbodies, including hardness and ionic composition, can reduce ammonia toxicity. In the 1999 Update to the 1985 Ambient Water Quality Criteria for Ammonia, US EPA stated that local effects of the exposure water could be addressed through "water effect ratios or other site specific approaches." The SSOs developed within this study make adjustments for the higher hardness and ionic concentration of the Los Angeles Region's waterbodies. The



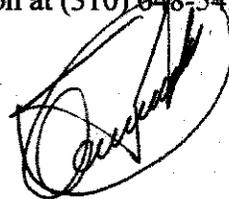
Ms. Jeanine Townsend, Acting Clerk to the Board
State Water Resources Control Board
December 19, 2007
Page 2

development of the SSOs ensures that water quality objectives are an accurate representation of the local waterbodies.

The SSOs developed in this study will also allow treatment plants operating in the nitrification/de-nitrification (N/DN) mode, the operational flexibility necessary to meet ammonia limits while ensuring adequate disinfection and reducing the formation of Trihalomethanes (THMs) during chlorination. Additionally, the SSOs are an important part of the strategy for addressing nitrogen impairments through the Los Angeles River Nutrient TMDL. As a result, the Bureau would also request that the TMDL be reconsidered to include the SSOs as soon as possible after they become effective.

The Bureau appreciates the State Water Board's consideration of the Ammonia SSOs and strongly supports their adoption at the January 2008 hearing. The Bureau looks forward to continuing to work with the Regional Board and the State Water Board on future collaborative scientific efforts that result in the development of accurate water quality objectives that are protective of the local environment. If you have any questions regarding this letter, please contact Mr. H. R. (Omar) Moghaddam of the Regulatory Affairs Division at (310) 648-5423 or Mr. Gus Dembegiotes of the Regulatory Affairs Division at (310) 648-5439.

Sincerely,



ENRIQUE C. ZALDIVAR, Director
Bureau of Sanitation

cc: Nancy Sutley, Mayor's Office
Cynthia Ruiz, Board of Public Works
Tracey Egosque, RWQCB
Ann Heil, County Sanitation Districts of Los Angeles County
Rodney Andersen, City of Burbank
Ashli Desai, Larry Walker Associates
Rafael Prieto, Chief Legislative Analyst Office
Traci Minamide, Bureau of Sanitation/EXEC
Varouj Abkian, Bureau of Sanitation/EXEC
Adel Hagekhalil, Bureau of Sanitation/EXEC
Hiddo Netto, Bureau of Sanitation/WRD
Omar Moghaddam, Bureau of Sanitation/RAD
Shahram Kharaghani, Bureau of Sanitation/WPD