



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street**

**San Francisco, CA 94105-3901**

MAY 18 2015

Samuel Unger  
Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Unger,

EPA is providing comments on the proposed amendments to the Basin Plan to revise the Total Maximum Daily Load for Trash in the Ballona Creek Watershed and in the Los Angeles River Watershed, dated April 3, 2015. We note that this reconsideration is not making significant changes to the existing numeric targets, loading capacity, waste load allocations, load allocations, margin of safety, seasonal variations, and critical conditions.

We reviewed the proposed revisions to the TMDLs in Ballona Creek Watershed and Los Angeles River Watershed, including expanded clarifications on implementation actions and the addition of receiving water monitoring. In general, EPA supports efforts to provide clarity and consistency for all the trash TMDLs in both Ballona Creek Watershed and the Los Angeles River Watershed. This should prevent inefficiencies and allow for better consistent actions among all entities in the Los Angeles region (e.g., adding the Los Angeles Country Flood Control District as an entity to both the Ballona Creek and Los Angeles River Watershed TMDLs). The proposed revisions also identified the specific municipal stormwater permittees responsible for the waste load allocations, in addition to the specific entities responsible for load allocations. We believe this is a positive addition to the revised TMDLs since it describes clearly each entity's responsibility.

We support the specificity of the Trash Monitoring and Reporting Plan to include monitoring sites at representative and critical locations, alternate monitoring locations, frequency of monitoring, and annual sampling assessment at the same location to better track progress over time. The addition of a water monitoring component to the implementation of the TMDLs will provide critical data to demonstrate water quality improvement over time.

Finally, we support the additional language better defining compliance with "100% trash reduction" for partial capture efforts and addressing nonpoint sources generating substantial trash. These additions are necessary to address trash as a pollutant and can help practically inform future trash implementation practices in California. As always, we appreciate working with you, and value your proactive efforts towards improving these trash TMDLs. If you have questions, please contact me at 213-244-1803.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cindy Lin", with a long horizontal flourish extending to the right.

Cindy Lin

TMDL Coordinator, Water Division

cc: Rik Rasmussen, SWRCB

Renee Purdy, LA RWQCB