

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

March 30, 2017

Rene Purdy, Section Chief Regional Programs
Los Angeles Regional Water Quality Control Board

Electronically Transmitted to
losangeles@waterboards.ca.gov

Attention Jun Zhu:

Subject: **Comment Letter- Revisions to the Los Angeles Region 303(d) list**

The Lower San Gabriel River (LSGR) Watershed Committee appreciates this opportunity to provide comments regarding the pending 303(d) list changes applicable to the LSGR Watershed. Comments will be limited to three pollutants proposed to be added to the 303(d) list.

The LSGR Watershed Committee recognizes the recommendation regarding Temperature in Reach 1 and Reach 2 of the San Gabriel River and requests that the Regional Board take into consideration the characterization of these Reaches of the San Gabriel River in its determination of temperature as a pollutant. As described as a Water Quality Objective:

*“the natural receiving water temperature of all regional waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does **not adversely affect** beneficial uses.”*

Beginning upstream, Reach 2 is a 7-mile stretch from the outlet of the Whittier Narrows Dam and ends where the San Gabriel River crosses Firestone Blvd. Reach 2 is confined by engineered levees and rip-rap. The river remains a soft-bottom channel and during dry-weather has no measurable flow reaching Reach 1 due to having the most productive spreading grounds in Los Angeles County.

Reach 1 is a 10-mile stretch beginning at Firestone Blvd in Downey and extends to the confluence of the San Gabriel River with Coyote Creek. It is a heavily urbanized reach with a concrete bottom. Two significant POTWs discharge into this Reach. During dry weather, these POTWs discharge vastly more water than enters the river channel through the combined MS4 outfalls. The volume of the POTW discharge will quickly render any potentially elevated temperature from discharges of MS4 outfalls as negligible.

The Committee believes that a Water Quality Objective for Temperature in these Reaches is not applicable.

In regards to Iron and Malathion in Coyote Creek; the LSGR Watershed Committee requests the Regional Board suspend the recommendation of Iron and Malathion due to monitoring data inconsistent with recent water body improvements. The LSGR Watershed has made a considerable effort in developing and implementing its Coordinated Integrated Monitoring Program (CIMP) and suggest monitoring data should reflect more recent and current outfall conditions and that any conclusions should be drawn from a more current and comprehensive data set. The LSGR believes this request is justified when considering that Iron and Malathion are derived from nationally Recommended Water Quality Standards and not based on an established EPA TMDL or conditions characteristic of Southern California waters.

The LSGR Watershed Committee appreciates the Regional Board's attention to detail and the efforts to protect the Lower San Gabriel Watershed. Thank you for your time and consideration.

Sincerely,

Lower San Gabriel River Watershed