

Artesia
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Downey
Hawaiian Gardens
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Long Beach
Norwalk
Pico Rivera
Santa Fe Springs
Whittier

Board Meeting
Los Cerritos & San Gabriel River TMDL
Deadline: 1/20/14 by 12:00 noon

Lower San Gabriel River Watershed Committee



January 16, 2014

commentletters@waterboards.ca.gov

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

Subject: Comment Letter – In Support of the 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:

The Lower San Gabriel River Watershed Committee, comprised of agencies tributary to Reach 1 and 2 and portions of Reach 3 of the San Gabriel River, held its regular meeting on January 16, 2014. At this meeting, the committee voted in favor of expressing **support** of the adoption and approval of the Implementation plan and schedule for the San Gabriel River (and as several agencies are also in the Los Cerritos Channel drainage area, support of that implementation plan and schedule as well).

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.

The Lower San Gabriel River Watershed Committee also appreciates 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.

The Lower San Gabriel River Watershed Committee further appreciates the provision in the Basin Plan Amendment that, subject to Executive Officer approval, if our forthcoming Watershed Management Programs (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. 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.

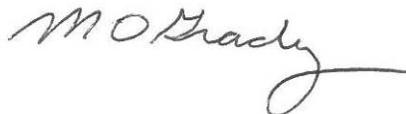
Similar comments supporting the Basin Plan Amendments were previously made to the Los Angeles Regional Water Board, and urge you to approve the Final Basin Plan Amendment adopted by the Los Angeles Regional Water Quality Control Board.

If you have any questions concerning these comments please contact Adriana Figueroa at (562-929-5915 or afigueroa@norwalkca.gov).

Sincerely,



Adriana Figueroa, Chair
Lower San Gabriel River
Watershed Committee



Mike O'Grady, Co-Chair
Lower San Gabriel River
Watershed Committee

Cc: Lower San Gabriel River Committee Agencies