

The City of Bellflower

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Via E-mail to: 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



Re: 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:

The City of Bellflower (City) appreciates the opportunity to provide comments on the amendments to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to incorporate Implementation Plans and Schedules for the Metals Total Maximum Daily Loads (TMDLs) for the Los Cerritos Freshwater Channel and the TMDLs for Metals and Selenium in the San Gabriel River and Impaired Tributaries. The 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 and the Lower San Gabriel River Watershed Committee (Watersheds). The adoption of Implementation Plans with Implementation Schedules is essential because these TMDLs were established by the USEPA, which does not adopt implementation plans and schedules for the 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 appreciate the Regional 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.

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Council Member

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

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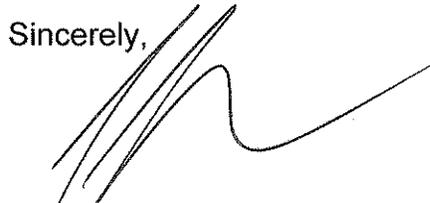
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We further appreciate the provision in the Basin Plan Amendment that, subject to Executive Officer approval, if our forthcoming Watershed Management Programs (WMPs) demonstrate that control measures and BMPs will achieve wet-weather water quality-based 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. Our City supports the decision of the Watersheds 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 WQBELs consistent with the schedules in Tables 7-20.2 and 7-32.2.

The City supports the detailed comments submitted under separate cover by the Los Cerritos Channel Watershed Group. We urge the State Water Resources Control Board to approve the Final Basin Plan Amendment, as adopted by the Regional Board.

If you have any questions concerning these comments, please contact Bernardo Iniguez, Environmental Services Manager, at 562-804-1424, ext. 2233.

Sincerely,



Jeffrey L. Stewart
City Manager

c: City Council