

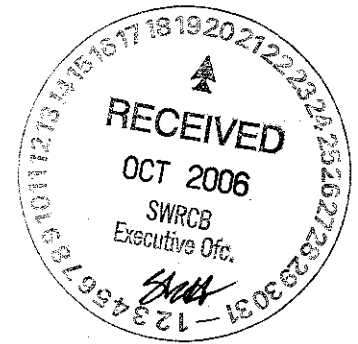


Heal the Bay

1444 9th Street
Santa Monica CA 90401

ph 310 451 1550
fax 310 496 1902

info@healthebay.org
www.healthebay.org



October 20, 2006

Chairwoman Doduc and Board Members
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

**Re: Comments on the Proposed Basin Plan Amendment to Establish a TMDL for Bacteria
in Ballona Creek, Ballona Estuary, and Sepulveda Channel**

Dear Chairwomen Doduc and Board Members:

On behalf of Heal the Bay, we submit the following comments on the proposed Basin Plan Amendment to establish a TMDL for Bacteria in Ballona Creek, Ballona Estuary, and Sepulveda Channel ("TMDL"). We appreciate the opportunity to provide comments.

Heal the Bay supports the TMDL adopted by the Los Angeles Regional Water Quality Control Board on June 8, 2006 (Resolution No. R4-2006-011). In particular, we strongly support the decision to make the final wet-weather compliance deadline (10 years from the effective date) consistent with the Santa Monica Bay Beaches Wet Weather Bacteria TMDL schedule. As Ballona Creek is a major source of bacteria to Santa Monica Bay, properly aligned compliance schedules are necessary to ensure compliance in the Bay.

In sum, we believe that implementation of this TMDL will lead to water quality standards attainment. This TMDL is not only critical for achieving bacteria water quality standards in Ballona Creek and Estuary but also for ensuring water quality standards attainment in Santa Monica Bay near the Estuary's outlet. We therefore urge the State Board to adopt the Resolution approving the TMDL.

If you have any questions or would like to discuss any of these comments, please feel free to contact us at (310) 451-1500. Thank you for your consideration of these comments.

Sincerely,

Kirsten James, MESM
Staff Scientist

Mark Gold, D. Env.
Executive Director