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Councilmember
LUIGI VERNOLA
Councilmember
MICHAEL J. EGAN
City Manager

Public Comment
Dominguez Channel/LA/Long Beach
Waters Toxic Pollutants TMDL
Deadline: 10/28/11 by 12:00 noon



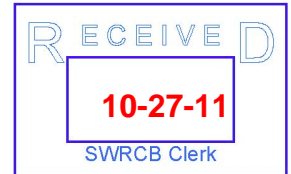
City of
NORWALK

12700 NORWALK BLVD., P.O. BOX 1030, NORWALK, CA 90651-1030 * PHONE: 562/929-5700 * FACSIMILE: 562/929-5773 *

October 27, 2011

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

commentletters@water



Subject: Comments regarding TMDL for Toxics Pollutants in the Dominguez Channel and Greater Los Angeles and Long Beach Harbors.

Dear Ms. Townsend:

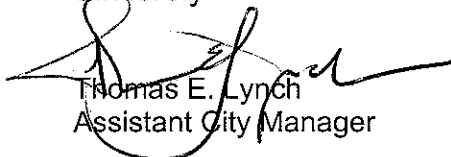
The City of Norwalk is tributary to the San Gabriel River, which discharges into the Greater Los Angeles and Long Beach Harbor. As such, the city is submitting the following comments:

1. This TMDL combines multiple watersheds, multiple pollutants and two harbors. The net result is a TMDL that is far too complex and cumbersome for municipal agencies to understand much less implement. Since runoff from the City of Norwalk discharges into the San Gabriel River and only afterwards reach the Greater Harbor area, any TMDL should be in a separate document solely addressing the San Gabriel River.
2. The City of Norwalk is already covered by an existing US EPA Metals TMDL for the San Gabriel River and mention of metals in this TMDL introduces another element of confusion.
3. Norwalk was part of the Montrose Chemical settlement of the 1990s and thus should be specifically removed as a responsible party for discharges of DDT and related toxic pollutants.
4. The Toxics portion of the TMDL is more of a clean up and abatement order rather than a TMDL.

We understand that other tributary cities and other potentially affected parties such as the Port of Long Beach are submitting comments, some of which are of a highly technical nature, and wish to call your attention to those comments as well. This TMDL should be returned to the Regional Board with the recommendation that as the City of Norwalk is already under a metals TMDL, this portion of the TMDL should be eliminated. Similarly, as the City of Norwalk was part of the previous DDT settlement, this portion of the TMDL should be eliminated as well.

Thank you in advance for your attention to these comments.

Sincerely


Thomas E. Lynch
Assistant City Manager