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WATERSHED PROTECTION DIVISION  
1149 SOUTH BROADWAY, 10<sup>TH</sup> FLOOR  
LOS ANGELES, CA 90015  
TEL: (213) 485-0587  
FAX: (213) 485-3939  
WWW.LACITYSAN.ORG

September 16, 2015

## ELECTRONIC MAIL

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

Dear Ms. Townsend:

### **COMMENT LETTER: PROPOSED APPROVAL OF AN AMENDMENT TO THE WATER QUALITY CONTROL PLAN FOR THE LOS ANGELES REGION (BASIN PLAN) TO ADOPT SITE-SPECIFIC OBJECTIVES FOR LEAD AND COPPER IN THE LOS ANGELES RIVER WATERSHED AND TO REVISE THE TOTAL MAXIMUM DAILY LOAD (TMDL)**

The City of Los Angeles (City) Bureau of Sanitation (LASAN) appreciates the opportunity to provide technical comments on the Amendment to the Water Quality Control Plan - Los Angeles Region (Basin Plan) to Adopt Site-Specific Objectives for Lead and Copper in the Los Angeles River Watershed and to Revise the Total Maximum Daily Load (TMDL) for Metals in the Los Angeles River and Tributaries. LASAN would like to reiterate our support for the adoption of the proposed amendments.

The copper water-effect ratio (WER) and lead recalculation studies followed established USEPA guidance. The studies were rigorously reviewed by Los Angeles Regional Water Board staff and an independent Technical Advisory Committee. The multiple reviews of the work plan, interim work products, and final reports resulted in the most comprehensive site-specific objective study in Southern California. Additionally, the results of the copper WER study are consistent with the findings of previous efforts within the watershed, which were incorporated into the 2010 Metals TMDL Amendment.

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Page 2 of 2

LASAN finds the amendments overwhelmingly consistent with the findings of the studies and honors the commitment of both Los Angeles Regional Water Board staff and stakeholders' commitment to productively work together on these technical challenging issues.

If you have any questions, please e-mail me at [Shahram.Kharaghani@lacity.org](mailto:Shahram.Kharaghani@lacity.org) or call me at (213) 485-0587, or e-mail Ms. Vivian Marquez, of my staff, at [Vivian.Marquez@lacity.org](mailto:Vivian.Marquez@lacity.org) or call her at (213) 485-3928.

Sincerely,

  
SHAHRAM KHARAGHANI, Ph.D., PE, BCEE  
Program Manager

VM:SK:vm  
WPDCR9219

c: Jon Ball, LASAN  
Alfredo Magallanes, LASAN  
Vivian Marquez, LASAN