

Heal the Bay

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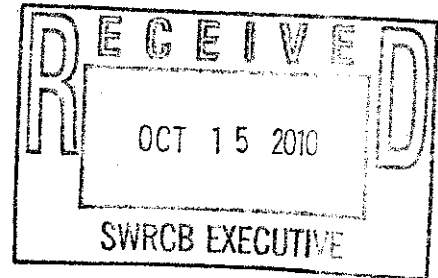
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Public Comment  
Colorado Lagoon TMDL  
Deadline: 10/20/10 by 12 noon

October 15, 2010

Chairman Charles R. Hoppin and Board Members  
State Water Resources Control Board  
1101 I Street, 24th Floor  
Sacramento, CA 95814  
Sent Via Email [commentletters@waterboard.ca.gov]



**Re: Comment Letter – Colorado Lagoon Toxicity TMDL**

Dear Chair Hoppin and Board Members:

On behalf of Heal the Bay, we submit the following comments on the proposed Amendment to the Water Quality Control Plan to Incorporate Total Maximum Daily Loads for Organochloride (OC) Pesticides, Polychlorinated Biphenyls (PCBs), Sediment Toxicity, Polycyclic Aromatic Hydrocarbons (PAHs), and Metals in Colorado Lagoon (“Draft TMDL” or “Draft Toxics TMDL”). We appreciate the opportunity to provide these comments.

We strongly support the Draft TMDL adopted by the Los Angeles Regional Water Quality Control Board on October 1, 2009 (Resolution No. R09-005). In particular, we support the reasonable seven-year deadline for compliance and the waste load allocations (“WLAs”) chosen for this TMDL. The choice of WLAs based on CTR water quality criteria for protection of human health (consumption only) are more stringent than those for the protection of aquatic life, and as a result, these objectives will appropriately protect both aquatic life and fish consumption beneficial uses. The sediment targets based on ERLs are reasonable and protective numeric limits. Most importantly, we strongly support the inclusion of an explicit margin of safety. We urge the State Board to retain these positive attributes of the TMDL.

In sum, we believe the Draft TMDL is the best way to meet the threshold of attaining and maintaining water quality standards as set forth in the Clean Water Act, and thus, strongly support the proposed TMDL. If you have any questions, please contact us at 310-451-1500.

Sincerely,

Kirsten James, MESM  
Water Quality Director

W. Susie Santilena, MS, E.I.T.  
Water Quality Scientist