



Heal the Bay

1444 9th Street  
Santa Monica CA 90401

ph 310 451 1500  
fax 310 496 1902

info@healthebay.org  
www.healthebay.org

October 18, 2011

Chair 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: Proposed Approval of an Amendment to the Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties to Incorporate a Total Maximum Daily Load for Pesticides and Polychlorinated Biphenyls in Machado Lake**

Dear Chair Hoppin and Board Members:

On behalf of Heal the Bay, we submit the following comments on the Draft Machado Lake Pesticides and PCBs TMDL. Heal the Bay is an environmental organization with over 13,000 members dedicated to protecting water quality for human health and aquatic life. We thank you for the opportunity to provide these comments.

We support the approval of the Machado Lake Pesticides TMDL. This TMDL has many positive aspects, such as the inclusion of concentration-based waste load allocations (WLAs) for the constituents of concern in the water column and the call for development of a Lake Water Quality Management Plan (LWQMP). In particular, we support the coordinated timeline for implementation with the Machado Lake Nutrient TMDL and the inclusion of an explicit margin of safety in the loading capacity for the lake.

We support the seven-year schedule for meeting final WLAs and LAs, as this is consistent with the timeframe for the TMDL for Eutrophic, Algae, Ammonia, and Odors in Machado Lake. It makes sense for the implementation schedule for this TMDL to be shorter relative to other Region IV TMDLs because the City of LA has already completed a conceptual design of the Machado Lake Ecosystem Rehabilitation Project and Wilmington Drain Multi-Use Project -- a comprehensive project to restore and dredge the lake. The City has earmarked Proposition O funding to implement the project by mid-2014. This 117 million dollar project will be the key to meeting the WLAs in this TMDL.

We also support the inclusion of an explicit 10% margin of safety to the loading capacities for constituents of concern in the lake. The Regional Board's decision to include an explicit margin of safety for LAs in the proposed TMDL is reasonable and justified. Regional Board staff appropriately highlights uncertainties in the calculation including:

- Limited data on the amount of pesticides and PCBs residing within the lake sediments
- Limited data on the amount of pesticides and PCBs entering the lake
- Estimated information on the depth to firm sediment in Machado Lake
- Estimated information on the watershed sediment deposition rate

(Staff Report Page 41). We believe these uncertainties warrant the 10% explicit margin of safety appropriately included in this TMDL.



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In conclusion, we are supportive of many aspects of the Machado Lake Pesticides and PCBs TMDL, and we urge the State Board to adopt it. 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,

A handwritten signature in cursive script that reads "Kirsten James".

Kirsten James, MESM  
Water Quality Director  
Heal the Bay

A handwritten signature in cursive script that reads "W. Susie Santilena".

W. Susie Santilena, MS, EIT  
Environmental Engineer  
Heal the Bay