



Port of
LONG BEACH
The Green Port

Public Comment
Sediment Quality Objectives
Deadline: 12/14/17 by 12 noon



December 14, 2017

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

Subject: Comments on the Proposed Amendments to the Water Quality Control Plan for Enclosed Bays and Estuaries: Sediment Quality Provisions

Dear Ms. Townsend:

The Port of Long Beach and the Port of Los Angeles appreciate the opportunity to submit comments on the proposed amendments to the Water Quality Control Plan for Enclosed Bays and Estuaries. The Ports are supportive of the adoption of the proposed amendments because Sediment Quality Objectives are comprehensive, science-based assessment tools. We have three comments on the proposed Plan, which we respectfully offer below:

Fish Sampling Methods:

The Draft Amendment provides guidance on field collection procedures as page 18 and 19, Section IV.A.2.b.3.b states, "Fish shall meet sportfish angling size requirements." Meeting angling size requirements is often a challenge and could significantly hamper the success of field collection efforts.

Recommendation: Modify the language to state, "Fish shall meet sportfish angling size requirements where possible."

Consistency with SQO Direct Effects in the interpretation of "Possibly Impacted" category for the protection of aquatic life:

On page 33, Section IV.A.4.c.2.a, the guidance suggests "Possibly Impacted" is a final result and is treated the same as "Likely Impacted." This seems inconsistent with flexibility provided on page 38 under Stressor Identification for direct effects which allows further evaluation of the "Possibly Impacted" result.

Recommendation: Add clarification that further evaluation of "Possibly Impacted" results to determine actual impairment may be conducted, as recommended in Section IV.A.4.f.

Consistency with SQO Direct Effects in the interpretation of "Possibly Impacted" category for the protection for Human Health:

On page 33, Section IV.A.4.c.2.c, the guidance states an indirect effects category of "Possibly Impacted" results in a categorization of "Impaired." This seems inconsistent with flexibility provided on page 38 under Stressor Identification for direct effects which allows further evaluation of a "Possibly Impacted" result.

Recommendation: Provide guidance for interpretation “Possibly Impacted” category consistent with direct effects.

We appreciate your consideration. Thank you.

Sincerely,



Heather A. Tomley
Director of Environmental Planning
Port of Long Beach



Christopher Cannon
Director of Environmental Management
Port of Los Angeles

JBV