UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Tam M. Doduc
Board Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Ms Doduc,

The U.S. Environmental Protection Agency (EPA) supports the Los Angeles Regional Water Quality Control Board's proposed amendment Basin Plan to establish Total Maximum Daily Loads (TMDLs) for metals in Ballona Creek and Sepulveda Canyon Channel. In 2005, EPA previously approved these TMDLs because the state's submittal met all federal requirements under the Clean Water Act. We support the current version of these TMDLs, based on the similar technical approach and the adaptive implementation plan to reduce metals loadings to both waterbodies.

EPA has reviewed the proposed amendment for these TMDLs and we note the addition of an alternatives analysis as required by the California Environmental Quality Act (CEQA). We agree with the Los Angeles Water Board's staff finding that the previously adopted TMDL contains the best approach to ensure the identified impaired segments will attain applicable water quality standards; i.e., the California Toxics Rule. We find these TMDLs, including the waste load allocations and load allocations, will appropriately restore the beneficial uses of the impaired Ballona Creek and Sepulveda Canyon Channel. The implementation plan proposes using reasonable best management practice controls that are consistent with EPA's 2002 national guidance on development of TMDLs to address storm water sources. Finally, EPA agrees the compliance schedule established in the previously adopted TMDL should be maintained to allow the most expeditious completion of the TMDL.

We urge the State Board to promptly approve these metals TMDLs for Ballona Creek and Sepulveda Canyon Channel. If you wish to discuss this matter further, please call me at (415) 972-3572.

Sincerely,

Alexis Strauss 14 May 2008
Alexis Strauss
Director, Water Division

cc: Tracy Egoscue, Los Angeles RWQCB