

# CITY OF LOS ANGELES

CALIFORNIA



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February 13, 2013



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

Dear Ms. Townsend:

**COMMENT LETTER – (1) SANTA MONICA BAY BEACHES; (2) MARINA DEL REY HARBOR MOTHERS' BEACH AND BACK BASINS; (3) LOS ANGELES HARBOR, INNER CABRILLO BEACH, AND MAIN SHIP CHANNEL; (4) BALLONA CREEK, BALLONA ESTUARY, AND SEPULVEDA CHANNEL; (5) MALIBU CREEK AND LAGOON; AND TO AMEND CHAPTER 3 TO MODIFY THE IMPLEMENTATION PROVISIONS FOR WATER CONTACT RECREATION BACTERIA OBJECTIVES**

On January 16, 2013, the California State Water Resources Control Board released an announcement that it would accept comments on the proposed approval of the Los Angeles Regional Water Quality Control Board's amendments to the Basin Plan to revise the Bacteria Total Maximum Daily Load (TMDL) for (1) Santa Monica Bay Beaches; (2) Marina del Rey Harbor Mothers' Beach and Back Basins; (3) Los Angeles Harbor, Inner Cabrillo Beach, and Main Ship Channel; (4) Ballona Creek, Ballona Estuary, and Sepulveda Channel. The City of Los Angeles, Bureau of Sanitation (Bureau) appreciates the opportunity to comment on the TMDL revisions.

Water quality at our beaches is one of our highest priorities, and the City's efforts to reduce and eliminate discharges of bacteria began in the 1990's, where early efforts include implementing over twenty-three low flow diversion facilities along Santa Monica Bay Beaches. Later City efforts include spending \$20M for capital improvement and beach remediation projects at Inner Cabrillo Beach, and working with other watershed agencies in Marina del Rey to implement three low flow diversions to protect the back basins, and implementation of green projects to improve water quality in Ballona Creek.

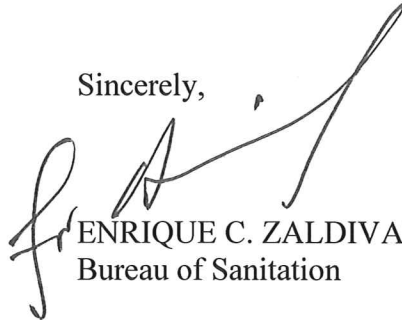


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Page 2

We support the revisions to the TMDLs and believe they have markedly improved the TMDLs by taking recent data, monitoring, and implementation experience into account. We also support the additional reconsideration scheduled for 2018 for all the TMDLs to further refine them and help us ensure that public resources are most effectively utilized. Finally, we also thank the Los Angeles Regional Board staff for their time and energy in meeting with us during the TMDL re-opener process.

If you have any questions, please contact Ms. Donna Chen, TMDL Development Section Manager at (213) 485-3928, or Mr. Zora Baharians, staff lead for bacteria TMDLs, at (213) 485-3918.

Sincerely,



ENRIQUE C. ZALDIVAR, Director  
Bureau of Sanitation

ECZ:SK:DC:ZB  
WPDCR9010

cc: Sam Unger, California Regional Water Quality Control Board – Los Angeles Region  
Deborah J. Smith, Regional Water Quality Control Board – Los Angeles Region  
Renee Purdy, Regional Water Quality Control Board – Los Angeles Region  
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