Comment	Response
Department of Water and Power the City of Los Angeles ANTONIO R. VILLARAIGOSA *Mayor* Commission THOMAS S. SAYLES, *President* ERIC HOLOMAN, *Vice President* RICHARD F. MOSS CHRISTINA E. NOONAN JONATHAN PARFREY BARBARA E. MOSCHOS, *Secretary* RONALD O. NICHOLS *General Manager* October 19, 2012 Mr. Richard Booth Chief, TMDL/Basin Planning Unit California Regional Water Quality Control Board Lahontan Region 2501 Lake Tahoe Boulevard South Lake Tahoe, CA 96150 Dear Mr. Booth: Subject: Comment Letter – Triennial Review of the Water Quality Control Plan for the Lahontan Region The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit comments on the triennial review of the Water Quality Control Plan for the Lahontan Region (Basin Plan). LADWP supports Lahontan's Water Quality Control Plan and recognizes its importance in protecting beneficial uses; and submits the following comments: **Hot Creek Water Quality Objectives** LADWP supports the development of revised objectives for Hot Creek, to account for changed naturally-occurring pollutant concentration levels in natural groundwater flows. This would be in line with the Lahontan Regional Water Quality Control Board (RWQCB) policy regarding natural background conditions where concentrations are higher than the beneficial use protective water quality limit. RWQCB has stated that "their authority for protection of water quality from waste discharges is limited to regulation of 'controllable water quality factors' – those actions, conditions, or circumstances resulting from human activities that may influence the quality of waters of the state and that may be reasonably controlled. Where the natural background level is higher than the beneficial use protective water quality limit, the natural background level is considered to comply with the water quality objective. In such cases, other controllable factors are not allowed to cause any further degradation of water quality." **Freshwater Bacterial Objective Revision** LADWP supports Option 2 of the Fact Sheet, in which site specific objectives of 200 colony forming units (CFUs) of E. coli per 100 milliliters (ml) would be used for Bridgeport Valley; then in a second phase, other areas within the Lahontan Region Water and Power Conservation ...a way of life 111 North Hope Street, Los Angeles, California 90012-2607 *Mailing address:* Box 51111, Los Angeles 90051-5700 *Telephone:* (213) 367-4211 *Cable address:* DEWAPOLA Recyclable and made from recycled waste.	**LA-1**: Lahontan and State Water Board staff continue to work on developing amendments to the state listing policy to address water body impairments due solely to natural sources. In the absence of a statewide natural source exclusion policy, the only way to revise the Hot Creek Water Quality objectives is to develop site-specific objectives that are scientifically defensible. To expedite the work on this, LADWP can assist the Water Board staff on many tasks for this project. The recommendation in the 2012 Triennial Review Staff Report assigns this project a moderate priority and suggests working on it if additional resources become available. **LA-2**: The 2012 Triennial Review Staff Report recommends that Water Board staff continue to work on the water quality bacteria objectives as one of its highest basin planning priorities over the next three years (see Table 2 in Attachment A). The Triennial Review Staff Report does not include a recommendation for choosing one of the three options. Rather, it describes specific tasks that must be completed as part of the Water Board's continuing focus on the water quality bacteria objectives project (see 2012 Triennial Review Staff Report Table 3, Water Quality Bacteria Objectives tasks). For example, one such task is consideration of new federal and state bacteria guidance. In November 2012, USEPA released its *2012 Recreational Water Quality Criteria*; these guidelines include suggested values for *E. Coli* and enterococci values but not for fecal coliform. State Water Board staff is considering this new USEPA guidance as it develops its own state recreational water policy with bacteria standards. Any changes to existing water quality objectives must be scientifically defensible and protective of the region's beneficial uses.

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Mr. Richard Booth Page 2 October 19, 2012 would be considered for standard changes as the State Board or USEPA conducts their own actions on this subject. For the second phase, LADWP recommends that all waterbodies within the Lahontan Region be assigned the objective of 200 CFU of E. coli per 100 ml objective; with future data collection, by Waste Discharge Requirement (WDR) permit holders, to be used to reevaluate the objective when needed. This will allow for consistency throughout the Region and State as soon as possible, and allow for antidegradation concerns to be addressed when necessary. If there are any questions, please contact Mr. Clayton Yoshida of the Wastewater Quality and Compliance Group at 213-367-4651. Sincerely Katherine Rubin Manager of Wastewater Quality and Compliance CY:lr c: Mr. Clayton Yoshida	