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October 2, 2015

Mr. Samuel Unger, Executive Officer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Via Email: Samuel.Unger@waterboards.ca.gov; Deborah.Smith@waterboards.ca.gov;
Renee.Purdy@waterboards.ca.gov; Celine.Gallon@waterboards.ca.gov;
losangeles@waterboards.ca.gov

Re: 2014-2016 Triennial Review

Dear Mr. Unger,

On behalf of Heal the Bay, we submit the following comments on the *Tentative 2014-2016 Triennial Review Selection of Basin Planning Projects, Resolution No. R15-XX* ("Triennial Review"). Heal the Bay is an environmental organization with over 15,000 members dedicated to improving water quality in Santa Monica Bay and Southern California coastal water for people and marine life. We appreciate this opportunity to provide comments on the Triennial Review.

We support several of the projects recommended by Staff in the Staff Report. Specifically, we support staff pursuing the following projects:

- Continued development of Salt and Nutrient Management Plans for local groundwater basins
- Regional strategy to address water quality impacts of climate change

We also support staff's decision to not pursue several of the projects suggested by stakeholders, such as reconsideration of the designation of the Lower San Gabriel River Estuary, and development of technical guidance for making natural source determinations, though we do not believe that the latter should be included as a priority project for the next Triennial Review either. The following are comments on some of the other projects discussed in the Triennial Review.

Update Freshwater Ammonia Objectives

We are concerned about the proposed priority project to update freshwater ammonia objectives based on EPA water quality criteria since this criteria allows for determination of site specific objectives. While we understand that different sites may offer different levels of "protectiveness" to toxicity based on geochemical characteristics. Practically speaking, however, determining these differences with a high degree of certainty, and accounting for all the variability inherent to a watershed due to seasonality, weather, etc. while still ensuring that water quality objectives are adequately protective is challenging to say the least due to the complex nature of watersheds. Pursuing site specific objectives should be done



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with caution, and using robust and rigorous study design. In general, we are very concerned with adopting any new criteria that offer the potential of relaxing water quality standards.

Miscellaneous

While we were glad to see exploration of surface water recharge as a new beneficial use recommended as a priority along with identification and update of beneficial uses for coastal and spring-fed streams, we were disappointed that these projects were not identified as priorities for this Triennial Review. In particular for the surface water recharge beneficial use, since this project was identified as a priority by several stakeholders, it seems that it should be considered. In general, the Regional Board should prioritize projects that would strengthen water quality protections and deprioritize those projects that would weaken them. Updating and identifying beneficial uses is a critical first step to ensuring that water resources are properly protected.

Thank you for your consideration of these comments. If you have any questions or would like to discuss any of these comments, please feel free to contact us at (310) 451-1500.

Sincerely,

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