



City of South Gate

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GEORGE TROXCIL
Interim City Manager

October 27, 2011



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

commentletters@waterboards.ca.gov

Subject: *TMDL for Toxics Pollutants in the Dominguez Channel and Greater Los Angeles and Long Beach Harbors*

Dear Ms. Townsend:

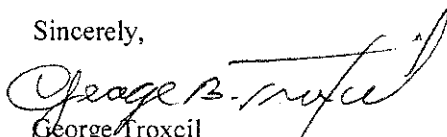
The City of South Gate is tributary to the Los Angeles River which discharges into the Greater Los Angeles and Long Beach Harbor. As such, the City is submitting the following comments:

1. This TMDL combines multiple watersheds, multiple pollutants and two harbors. The net result is a TMDL that is far too complex and cumbersome for municipal agencies to understand, much less implement. Any TMDL should be issued as part of a Los Angeles River TMDL and not the overly board; Los Angeles River and San Gabriel River and Dominguez Channel and Greater Harbor area as presented in the current TMDL.
2. South Gate is already covered by an existing Los Angeles River Metals TMDL and mention of metals in this TMDL introduces another element of confusion.
3. In the 1990s, South Gate was part of the Montrose settlement regarding the discharge of DDT and related compounds. This has already been settled under a previous consent decree and agreement and any reopening would effectively constitute double jeopardy. Thus South Gate (as well as other permittees) should be specifically removed as a responsible party for discharges of DDT and related toxic pollutants.
4. The toxics aspect of this TMDL appears to be more of a clean-up and abatement order than a TMDL.

Further, we understand that other tributary cities are also submitting comments, some of which will be of a highly technical nature, and we wish your attention to those comments as well. This TMDL should be returned to the Regional Board to be revised and made workable.

Thank you in advance for your consideration of these comments.

Sincerely,


George Troxcil
Interim City Manager

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