



City of Downey

FUTURE LIMITED



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 Downey is tributary to the Los Angeles River, The San Gabriel River and the Los Cerritos Channel, all of which discharge into the Greater Los Angeles and Long Beach Harbor. The City is concerned regarding the scope and complexity of the TMDL for Toxics Pollutants in the Dominguez Channel and Greater Los Angeles and Long Beach Harbors. As such, the city is submitted 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.
2. The City of Downey is already covered by: (1) an existing Los Angeles River Metals TMDL and (2) and existing San Gabriel Metals TMDL and (3) and existing Los Cerritos Channel Metals TMDL. Approval of this TMDL in its current format would add an unnecessary level of complexity to the city's stormwater program, as well as introducing another element of confusion (ie: which TMDL takes precedence?)
3. Downey was part of the Montrose settlement of the 1990s thus should be specifically removed as a responsible party for discharges of DDT and related toxic pollutants.
4. The Toxics aspect of this TMDL is more of a clean-up and abatement order rather than a TMDL.

The City requests that this TMDL be returned to the Regional Board to: (1) eliminate any reference to Metals TMDLs or Metals Waste Load Allocations from waterbodies already covered by a metals TMDL allocations, and (2) Eliminate and toxics TMDLs and Waste Load Allocations from cities already having participated in the Montrose Chemical agreement. 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.

Thank you in advance for your attention to these comments.

Sincerely,


Louis A. Atwell
Deputy Director of Public Works