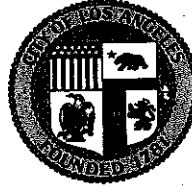


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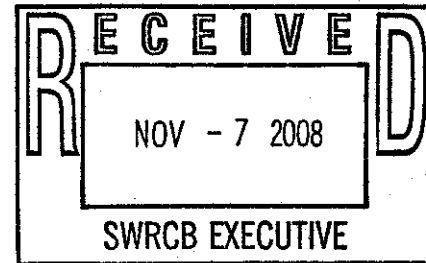
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November 7, 2008

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



**TECHNICAL COMMENT LETTER FOR DRAFT AMENDMENT TO THE WATER
QUALITY CONTROL PLAN THAT WOULD ESTABLISH A TMDL FOR
EUTROPHIC, ALGAE, AMMONIA, AND ODORS (NUTRIENTS) IN MACHADO
LAKE**

Dear Ms. Townsend,

The City of Los Angeles Bureau of Sanitation (Bureau of Sanitation) appreciates the opportunity to provide technical comments on the draft Amendment to the Water Quality Control Plan that would establish a TMDL for Eutrophic, Algae, Ammonia, and Odors (Nutrients) in Machado Lake. The Bureau of Sanitation has recognized the importance of recreational use, aquatic, and related beneficial uses in the lake, and views the restoration and protection of these uses as high priorities. As evidence of these, the City is spending \$120 million of its Proposition O funds to provide water quality enhancements in Machado Lake and Wilmington Drain.

The City is committed to reduce nutrients and nuisance algae, and to bring the lake into a healthy condition. The City also embraces the State of California's goal of use of recycled water as high priority and is committed to the use recycled water wherever possible. Machado Lake has been experiencing considerable water loss during the drought months and drinking water has been used to recharge the lake. The City's Terminal Island Water Reclamation Plant is close to Machado Lake, and the Department of Water and Power is considering extending the City's recycled water distribution system in the area providing our opportunity to use recycled water in Machado Lake and the vicinity wetlands.



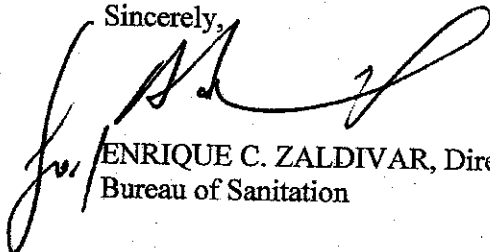
Ms. Jeanie Townsend
State Water Resources Control Board
November 7, 2008
Page 2

Currently, the use of recycled water to recharge Machado Lake is limited by the current low levels of nitrogen and phosphorus established by the TMDL. This is contradictory to State policies that encourage potable water conservation and the increased use of recycled water. Data shows that the nitrogen and phosphorus concentrations in recycled water have been consistently higher than the TMDL targets. It is also important to note that potable water in the area has a maximum concentration of 10.0 mg/L for nitrogen, and higher phosphorus level than allowed in the TMDL. Presently, neither potable water nor recycled water standards can comply with the nitrogen and phosphorous TMDL targets, and will likely exceed the waste load allocation (WLA) for nitrogen and phosphorus in this TMDL. We believe nitrogen and phosphorous targets corresponding to recycled water will conserve water and establish a non-eutrophic, healthy condition in Machado Lake, which is the goal of the TMDL.

Therefore, the Bureau of Sanitation is recommending that the SWRCB adopts policies or guidelines to support the use of recycled water instead of drinking water as make up water for urban lakes, and consider adopting the concept of "healthy lake", as it is related to non-eutrophic conditions and reduction of algal growth. This "healthy lake" condition can be achieved at nutrient levels slightly above the WLAs and meet the goal of the TMDL.

If you have any additional questions regarding the Bureau of Sanitation's technical comments, please contact the Watershed Protection Division's Assistant Division Manager, Ms. Donna Chen at (213) 485-3928 or Ms. Shokoufe Marashi, Ph.D., staff lead on this TMDL at (213) 485-3937.

Sincerely,



ENRIQUE C. ZALDIVAR, Director
Bureau of Sanitation

ECZ:DC:SM

Cc: Deborah J. Smith, Regional Water Quality Control Board
Sam Unger, Regional Water Quality Control Board
Rebecca Veiga Nascimento, Regional Water Quality Control Board
Terrence Fleming, U.S. EPA Region 9
Michael Mullin, Mayor's Office
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