



Heal the Bay

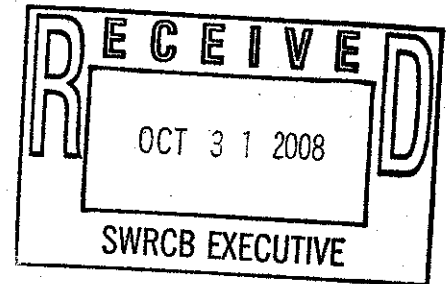
1444 9th Street
Santa Monica CA 90401

ph 310 451 1550
fax 310 496 1902

info@healthebay.org
www.healthebay.org

October 31, 2008

Chairwoman Doduc and Board Members
State Water Resources Control Board
1101 I Street, 24th Floor
Sacramento, CA 95814
Sent Via Email [commentletters@waterboard.ca.gov]



Re: Comment Letter – Machado Lake Nutrients TMDL

Dear Chair Doduc and Board Members:

On behalf of Heal the Bay, we submit the following comments on the Draft Machado Lake Eutrophic, Algae, Ammonia, and Odors (Nutrient) TMDL. We appreciate the opportunity to provide these comments.

Heal the Bay supports the TMDL adopted by the Los Angeles Regional Water Quality Control Board on May 1, 2008 (Resolution No. R08-006). This TMDL appropriately paves the way for water quality standards attainment in Machado Lake. In particular, we strongly support the inclusion of concentration-based load allocations (LAs) and waste load allocations (WLAs) for total phosphorus and total nitrogen and the implementation schedule proposed.

A critical aspect of this TMDL is the inclusion of WLAs and LAs for total nitrogen and total phosphorus. Requiring the reduction of *both* nutrients ensures successful abatement of the eutrophic conditions in the lake. It is well established in the scientific literature that the impacts of nitrogen and phosphorus on algal growth are complex, involve numerous factors, and are often waterbody specific. Often, the importance of nitrogen and phosphorus will change with fluctuating conditions in the waterbody,¹ so it is necessary to set targets for both nutrients. Appropriately, TMDLs for two other lakes in California also require reductions of both nutrients².

We also support the implementation schedule for the TMDL. As mentioned in the discussion paper, "The TMDL requires stormwater permittees to achieve interim waste load allocations upon the effective date of the TMDL and final waste load allocations 9.5 years from the effective date of the TMDL," which allows adequate time to reach final waste load allocations. In addition, the Los Angeles Water Board has committed to reconsidering the TMDL in a re-opener 7.5 years from the effective date. This re-opener will be an appropriate arena to discuss potential implementation schedule extensions, taking into account the effectiveness of restoration efforts at that time. The City of LA has already completed a conceptual design of a comprehensive project to restore the lake and has earmarked Proposition O funding to implement the project by

¹ See the reference section of U.S. EPA 2000 Nutrient Criteria Technical Guidance Manual Lakes and Reservoirs for a comprehensive list of studies.

² Staff report, page 26.



Heal the Bay

1444 9th Street
Santa Monica CA 90401

ph 310 451 1550
fax 310 496 1902

info@healthebay.org
www.healthebay.org

mid-2014. The scheduled re-opener will occur one year after scheduled lake restoration and BMP construction. This timing is consistent with the City's Proposition O project, as there will be time to collect at least one year of data on the effectiveness of the project prior to the re-opener.

In sum, we believe that implementation of this TMDL will greatly improve water quality in Machado Lake and lead to the attainment of water quality standards for eutrophication, algae, ammonia, and odors (nutrients). We therefore urge the State Board to adopt the Resolution approving the TMDL.

Sincerely,

Kirsten James
Water Quality Director

W. Susie Santilena
Water Quality Scientist