

February 3, 2012

Submitted via email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)  
Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



Re: 2/7/2012 BOARD MEETING (Agenda Item 7, Consideration of a proposed Resolution approving an amendment to the Water Quality Control Plan for the Los Angeles Region to incorporate a total maximum daily load for toxic pollutants in Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters)

Dear Ms. Townsend:

This letter is being submitted on behalf of the City of Signal Hill. Signal Hill's technical consultant, Dr. Susan Paulsen of Flow Science on Thursday, February 2, 2012 was advised that the Regional Board had submitted a series of technical comments and documentation to the State Board in connection with the State Board's proposed consideration of the Harbor Toxics TMDL. Dr. Susan Paulsen and Flow Science have only had an opportunity to perform a very cursory review of these technical documents given that they were just disclosed to Dr. Paulsen on February 2 with no opportunity to review them until the afternoon of February 2. However, in the limited review that has been conducted by Dr. Paulsen, it appears there are significant technical flaws and deficiencies in the Regional Board's analysis.

On behalf of the City of Signal Hill, the City respectfully objects to the inclusion of these documents in the record and to the State Board's consideration of them. Due process has not been provided to the City or the public, as they have not been given a full and fair opportunity to evaluate these comments and provide valuable input to the State Board in its consideration of these issues. It is unfortunate that such an analysis had not been disclosed previously in sufficient time to have Signal Hill and others comment on the Regional Board's analysis in time for the February 2, 2012 comments submission deadline to the State Board.

If you have any questions or need any additional information in this regard, please do not hesitate to contact the undersigned. Thank you.

Sincerely,

RUTAN & TUCKER, LLP

A handwritten signature in black ink, appearing to read "Richard Montevideo".

Richard Montevideo

cc: Dr. Susan Paulsen  
Mr. Kenneth Farfsing