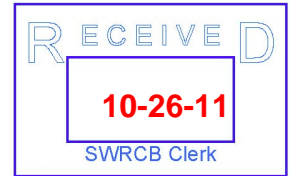


# CITY OF HAWTHORNE



4455 West 126th Street • Hawthorne, CA 90242

Department of Public Works  
Office: (310) 349-2000



October 27, 2011

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

[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Total Maximum Daily Load (TMDL) for Toxics Pollutants in the Dominguez Channel and Greater Los Angeles and Long Beach Harbors.**

Dear Ms. Townsend:

The City of Hawthorne is tributary to the Dominguez Channel, 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.
2. Hawthorne was part of the earlier Montrose Chemical settlement has thus should be specifically removed as a responsible party for discharges of DDT and related toxic pollutants.
3. The Toxics aspect of this TMDL is more of a clean-up and abatement order rather 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 re-issued as separate Dominguez Channel and Harbor TMDLs and separate toxics and metals TMDLs.

Thank you in advance for your attention to these comments.

Sincerely

Arnold Shadbeh, P.E.  
Director of Public Works/City Engineer  
City of Hawthorne