

Public Comment  
LA River Metals TMDL  
Deadline: 3/10/11 by 12 noon

Department of Water and Power



the City of Los Angeles

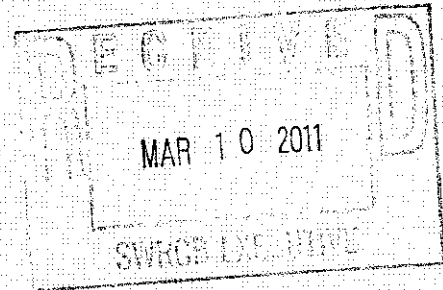
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March, 10, 2011

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



Dear Ms. Townsend:

Subject: Comment Letter – Los Angeles River Metals TMDL Revision

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Revised Metals TMDL for Los Angeles River. LADWP believes that the site-specific nature of the arid Southwest makes studies such as the determination of Water Effects Ratios (WERs) to modify water quality targets essential for the protection of beneficial uses related to aquatic life.

On occasion LADWP discharges water to the Los Angeles River from sources such as reservoir draining (for maintenance), construction dewatering of groundwater, and hydrostatic testing of large water pipes and trunk lines. These discharges may have volumes in the hundreds of thousands of gallons, and in the case of hydrostatic testing and reservoir draining, the water is suitable for consumption. LADWP is concerned that in the instances where copper concentrations exceed the TMDL targets, there may be no practicable way to dispose of or treat waters in these volumes.

Thus, LADWP supports the continued work to develop WERs that can apply to all non-stormwater dischargers in the Los Angeles River watershed.

LADWP thanks the Los Angeles Regional Water Quality Control for their recent approval of a WER workplan that may allow more dischargers in the Los Angeles River Watershed to take advantage of the site-specific adjustment of TMDL targets.

If there are any questions regarding these comments, please call Mr. Clayton Yoshida, of Wastewater Quality and Compliance Group, at (213) 367-4651.

Sincerely,

  
Katherine Rubin, Manager  
Wastewater Quality and Compliance Group

CY:db  
c: Mr. Clayton Yoshida

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