



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



March 16, 2015

California Regional Water Quality Control Board  
Los Angeles Region  
ATTN: Jenny Newman  
320 W. 4th Street, Suite 200  
Los Angeles, CA 90013  
losangeles@waterboards.ca.gov

**Subject: Comments on the Los Angeles River Metals Total Maximum Daily Load Reconsideration Project**

Dear Ms. Newman:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced report for the Los Angeles River Total Maximum Daily Load (TMDL) Reconsideration project. The following comment has been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*

The proposed project includes amendments to the Water Quality Control Plan - Los Angeles Region (Basin Plan) to adopt site-specific objectives for lead and copper in the Los Angeles River watershed and to revise the TMDL for metals in the Los Angeles River and tributaries. Additionally, the project involves the use of the Los Angeles River Water-Effect Ratio Study which was conducted to support implementation of the Los Angeles River and tributaries TMDLs for metals.

The Department offers the following comment and recommendation to assist in avoiding or minimizing potential project impacts on biological resources.

After reviewing the materials and associated documents the Department is not clear about the cumulative (over a period of years) effect of adding additional copper and lead in a river system such as the Los Angeles River. Therefore, the Department would recommend that the document clearly discuss the cumulative effects of potentially adding higher concentrations of copper and lead to the Los Angeles River and how this may affect wildlife over time.

Jenny Newman  
California Regional Water Quality Control Board  
March 16, 2015  
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We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Bryand Duke at (858) 637-5511 or emailed to [Bryand.Duke@wildife.ca.gov](mailto:Bryand.Duke@wildife.ca.gov).

Sincerely,

A handwritten signature in purple ink, appearing to read "Gail K. Sevens". The signature is fluid and cursive, with a long horizontal stroke at the end.

Gail K. Sevens  
Environmental Program Manager  
South Coast Region