

LOWER LOS ANGELES RIVER  
**WATERSHED COMMITTEE**

May 18, 2015

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 California Regional Water Quality Control Board  
 Los Angeles Region  
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**Comment Letter- LAR Trash TMDL Revisions**

The Lower Los Angeles River Watershed (LLAR)<sup>1</sup> appreciates this opportunity to provide comments regarding the pending revisions to the Los Angeles River Trash TMDL. First we would like to thank Rene Purdy and her staff for extending the opportunity to meet on March 26, 2015 for the purpose of discussing the progress the LLAR has made, and the difficulties encountered in working towards the goal of reducing trash and litter discharged into the MS4.

The cities of the LLAR have installed a combination of CPS full-capture inserts in all catch basins where it was physically possible to do so. The only catch basins that were not retrofitted were those that were too small, or where the CPS units would block the inlet or outlet of the catch basins or similar physical limitations. In addition to the CPS units, automatic retractable screens (ARS) were also installed either in tandem with the CPS units or separately. Collectively, the LLAR cities have already exceeded the 90 percent baseline reduction goal of the existing TMDL. The LLAR cities appreciate the effort Regional Board has made, recognizing the difficulties Permittees have in achieving the last few percentage points of that original goal of a 100 percent reduction.

Our comments are:

**1. Bottom of Page 4**

A minor, but potentially significant grammatical error,

*“ - - that the Executive Officer make a determination that the agency is in full compliance with its final WLA if all of the following criteria are met: - - ”* ,

then goes on to lists thee distinct alternatives. The word “all” is not appropriately used.

**2. Top of Page 5**

Option “1)” on the top of page 5 should be modified to reflect the physical limitations of existing catch basins which is the case of the LLAR cities installed CPS units in every catch basin within the LLAR jurisdictional area owned by County Flood Control where that agency would issue a permit for

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<sup>1</sup> These comments do not reflect those of the Los Angeles County Flood Control District which will be submitting comments separately

installation. The LLAR cities found that 6 to 14 percent of the catch basins could not meet County Flood Control District's criteria for permit issuance at that time (i.e: would result in greater flooding risk). Therefore suggested new wording is underlined:

- 1) 98% of all catch basins within the agency's jurisdictional land area meeting Los Angeles County Flood Control Discharge and local agency criteria for permit issuance at the time of a jurisdictional retrofit program in the watershed are retrofitted with FCS ( or alternatively - - -

Even with this change, the LLAR Permittees would still be required by item 3 to submit a report to the Executive Office detailing partial capture devices and programs.

### 3. Bottom of Page 5

(DGR)5 should read (DGR)<sup>5</sup>

In closing, the cities of the LLAR would like to emphasize that a full capture insert was installed in every catch basin where physical limitations would allow. Due primarily to flooding concerns, installation permits could not be obtained for the remaining catch basins. Even so, partial capture systems were installed in many of the remaining catch basins. This achievement by the LLAR cities should be recognized.

Thank you for the opportunity to offer our comments.

Sincerely



Steve Myrter, Chair

Lower Los Angeles River Watershed Group