



June 3, 2010

Mr. Sam Unger
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street
Los Angeles, CA 90013

Attention: LB Nye and Man Voong

Dear Mr. Unger:

On behalf of Friends of the Los Angeles River I thank you for the opportunity to comment upon the CREST (Cleaner Rivers through Effective Stakeholder-led TMDLS) process and upon the April 20, 2010 Tentative Basin Plan Amendment to incorporate a Total Maximum Daily Load (TMDL) for Bacteria in the Los Angeles River.

As a CREST participant I now have a better understanding of both the complexities associated with undertaking such a comprehensive scientific study of the policies that affect various components of a TMDL. The Regional Board's incorporation of the dry weather schedule demonstrates understanding of the challenges the City faces in implementing TMDLs in such a large, complex watershed where the City has responsibilities in nearly every reach and tributary.

FoLAR applauds and supports the recommendations presented by the CREST team; their recommendations are based on good science and sound policy. As advocates for a swimmable, fishable, boatable Los Angeles River, we are pleased that so much time and consideration was given to analyzing the current and future recreational uses associated with the River by the numerous stakeholders who play important roles in protecting one of our region's most valuable resources. Addressing the remaining CREST critical issues, particularly in adopting additional changes supporting the "good actors" as identified in the CREST recommendations, is paramount to having an implementable and effective TMDL that is scientifically and legally defensible.

Incorporating these recommendations will promote future stakeholder TMDL processes by instilling confidence in stakeholders that the Regional Board is willing to resolve critical issues with a TMDL through all phases of the stakeholder TMDL process.

Sincerely,

Shelly Backlar
Executive Director