



January 19, 2016

320 West 4th Street #200
Los Angeles, CA 90013

RE: Waste Discharge Requirements for Los Angeles County Flood Control District (Discharger), Proposed Maintenance Clearing Of Engineered Earth-Bottom Flood Control Channels, Los Angeles County (File No. 99-011)

To the Regional Water Quality Control Board of Los Angeles Staff:

Friends of the Los Angeles River (FoLAR) is in support of the changes introduced in the 2016 Tentative Waste Discharge Requirements. We would like to thank the Board for the opportunity to comment on these WDRs. We recommended a few revisions to the draft WDR below.

Specific Comments

Finding 28

Although they were contacted, we do not believe the California Coastal Commission to have attended any WDR Working Group meetings.

Finding 29. e.

The pilot project was not just Reach 25, but also included Reach 24 at Compton Creek.

Findings 51 and 52

The pilot project was not just Reach 25, but also included Reach 24 at Compton Creek. While this project proved successful based on anecdotal evidence, FoLAR hopes to see more complete data collection from future pilot projects; so that success is supported by data.

Item 32

We support the directive to document and report on the success of these projects as outlined in this item. FoLAR recommends additional criteria should be considered when evaluating pilot projects, including ecosystem services, public health, and recreation. The additional criteria, as well as the specific metrics used to measure success in each of these categories, should be discussed and decided during the WDR Working Group meetings.

FoLAR

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FoLAR looks forward to continue participating in the WDR Working Group Meetings and be involved in reviewing feasibility studies and proposing/evaluating alternative maintenance practices and pilot projects. We have seen a lot of progress in the working group in 2015 (Finding 29) and agree that it is necessary to continue meeting for the next 2 years and 5 months in order to reach our Regional Board directive of creating an improved WDR permit.

Sincerely,

Shawn Warren

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Friends of the Los Angeles River

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