



GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

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IN REPLY PLEASE

REFER TO FILE: **WM-5**

January 19, 2016

Ms. Valerie Carrillo-Zara  
California Regional Water Quality Control Board  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Ms. Carrillo-Zara:

### **TENTATIVE WASTE DISCHARGE REQUIREMENT FOR MAINTENANCE OF EARTH-BOTTOM CHANNELS 2016 (ORDER NO. R4-2015-0032-A1)**

We have reviewed the tentative Waste Discharge Requirement for Maintenance of Earth-Bottom Channels 2016 (Order No. R4-2015-0032-A) prepared for the Los Angeles County Flood Control District. Please see our comments in Enclosure A.

Thank you for the opportunity to comment on this Tentative Waste Discharge Requirement. If you have any questions, please feel free to contact Mr. Dan Sharp at (626) 458-7153 or [DSHARP@dpw.lacounty.gov](mailto:DSHARP@dpw.lacounty.gov).

Very truly yours,

GAIL FARBER  
Director of Public Works

ANGELA R. GEORGE  
Assistant Deputy Director  
Watershed Management Division

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## Enclosure A

### General Comments

The numbers for Findings and Orders should be corrected to be sequential.

### Specific Comments

1. Findings No. 5

Los Angeles County Flood Control District's (LACFCD) maintenance plan under this Waste Discharge Requirement (WDR) doesn't allow or include hardscaping of any existing soft-bottom channels. We recommend removing this Finding from the WDR or revising the Finding to include that the LACFCD doesn't perform these activities under this WDR.

2. Findings No. 38

LACFCD has conducted additional analysis to include all 25 reaches of Los Angeles River. The results of these analyses were provided to the Regional Board staff and stakeholders at Working Group Meetings held throughout 2015. We recommend modifying the language in the Findings to reflect this action.

3. Findings No. 40

Bull Creek (Reach 7) was omitted as one of the eight Los Angeles River reaches identified to have additional capacity. The reaches are: 1, 7, 9, 19, 20, 21, 22 and 25.

4. Findings No. 41

Change seven reaches to eight and add Bull Creek (Reach 7) to the list.

5. Findings No. 42

Revise this Finding to show that the 17 Los Angeles River reaches that were identified as having no additional capacity to contain additional native vegetation or the replacement of non-native with native vegetation are: Reaches 4, 8, 15, 16, 24, 96, and 99. These reaches are currently and historically cleared of all vegetation on an annual basis.

Reaches 2, 3, 5, 6, 10, 12, 13, 14, 18, and 100 have also been identified as not having any additional capacity. However, these reaches have contained vegetation protected from removal under permits currently in force. LACFCD will seek approvals from applicable agencies to restore the original capacity by removing existing vegetation in these reaches.

6. Findings No. 47

The feasibility Study for San Gabriel River will be submitted before the end of January 2016 and should be included in a finding. In addition, substantial progress was made on the analysis of the Los Angeles River. Please revise the language in

this Finding to indicate that the Feasibility Study for San Gabriel River watershed was prepared and submitted to the Regional Board in January 2016. In addition substantial progress was made on the analysis of the Los Angeles River reaches.

As requested by stakeholders at the Working Group Meetings, a reanalysis of the Los Angeles River was conducted by LACFCD. The results of this analysis and a discussion of the methodology used were provided at the Working Group Meetings over several sessions. LACFCD also performed the ACOE's new Risk & Uncertainty analysis on Los Angeles River Reach 25 and results were provided at the Working Group Meetings.

7. Findings Nos. 51 and 52

The LACFCD voluntarily initiated pilot projects in 2015 for both Reach 25 of the Los Angeles River as well as Compton Creek. We request this statement be revised to indicate the voluntary nature of this action and to include the Compton Creek reach in the finding.

8. Orders Nos. 29 and 30,

The LACFCD will continue to work cooperatively with the Corps of Engineers regarding any changes to operations and maintenance practices. This may include pursuing a 408 Permit, but may involve a different approach determined by the Corps. The draft language assumes that a 408 Permit is the only approach and therefore LACFCD recommends an edit to this section.

9. Order No. 29

The LACFCD requests that this paragraph be modified so it is clear what is expected regarding the Risk and Uncertainty requirements from the Corps, and so that LACFCD can ensure compliance with these requirements. LACFCD, with assistance from ACOE and guidance from the Working Group Meetings, will work to determine the number of reaches to perform Risk and Uncertainty analyses. The purpose would be to identify those reaches with federally required maintenance standards that may be a candidate for revised maintenance procedures that would allow more vegetation to remain in the channel or that would allow alternative channel clearing approaches/methods.

10. Order No. 30

The LACFCD requests that this paragraph be modified to avoid ambiguity during permit implementation. LACFCD will continue to facilitate and host WDR Working Group Meetings once per month or less often with concurrence from Working Group Meeting participants during calendar year 2016, to involve stakeholders in review of feasibility reports and decision making concerning channel vegetation removal activities and the location, type and scope of pilot projects to evaluate alternative channel clearing approaches/methods.

11. Orders Nos. 29 and 30, and Pilot Projects Nos. 29-43

To reflect the cooperative nature of these efforts, we recommend moving Orders Nos. 29 and 30, and Pilot Projects No. 29 through 43 to the Findings section. The LACFCD is committed to completing the pilot projects identified as evidenced by the original Pilot Project undertaken in Reach 25. LACFCD would like to continue to proceed with these projects on a voluntary basis until we secure final approval from ACOE to formally implement the maintenance practices.

12. Pilot Projects No. 34

Compton Creek should be evaluated and included in the report in addition to Reach 25 of the Los Angeles River.

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