



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

December 6, 2017  
File No. 31-370-40.4A

***Via Electronic Mail***

Dr. Celine Gallon  
California Regional Water Quality Control Board  
Los Angeles Region  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Dear Dr. Celine Gallon:

**Comment Letter- 2017-2019 Triennial Review**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to submit comments to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) on the selected priorities for the 2017-2019 Triennial Review of the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan), as proposed in Public Notice released on November 6, 2017.

The Sanitation Districts request modification of the narrative descriptions of San Gabriel River Reach 1 (San Gabriel River Estuary to Firestone Boulevard) and Reach 2 (Firestone Boulevard to Whittier Narrows Dam), to eliminate hydrologic disparities within Reach 2. The United States Geological Survey (USGS) defines a reach as a continuous piece of surface water with similar hydrologic characteristics, such as a stretch of stream between two confluences or a lake. Under the current definition in the Basin Plan, Reach 2 includes areas of substantially different hydrologic characteristics: a natural bottomed zone with impoundments for groundwater replenishment, and approximately 14 mile of concrete lined flood control channel (Figure 1). The boundary between Reaches 1 and 2 would be more appropriately defined by the edge of the concrete channel, making Reach 2 completely unlined. The Regional Board's Geographic Information System (GIS) layers shown in Figure 1 capture this discrepancy: the line representing the reaches changes color from black (Reach 2) to green (Reach 1) at the edge of the concrete channel in the Major Streams layer, but the boundary (yellow point) is located at Firestone Boulevard in the Reachbreak layer. Defining Reach 1 from the San Gabriel River Estuary to the edge of the concrete-lined channel and Reach 2 from the edge of concrete-lined channel to Whittier Narrows Dam would allow the reaches in the Basin Plan to be consistent with the USGS definition of stream reaches.



Figure 1: Regional Board GIS layers for the boundary between Reaches 1 and 2 in the San Gabriel River. The yellow dot represents the boundary as shown in the Reachbreak layer, and the black and blue lines represent Reaches 1 and 2, respectively, in the Major Streams layer.

We look forward to working with the Regional Board as it considers its priorities for the 2017-2019 Triennial Review and on updates to the Basin Plan that follow. If you have any questions about our comments, please contact Nicholas Wiehardt at (562) 908-4288, extension 2818.

Very truly yours,

Ann T. Heil  
Reuse and Compliance  
Section Head