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August 8, 2013

VIA E-MAIL

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Dear Ms. Wadhvani:

RE: SWRCB/OCC FILE A-2236(A) THROUGH (KK) - TECHNICAL COMMENTS IN RESPONSE TO QUESTIONS POSED BY THE STATE WATER RESOURCES CONTROL BOARD CONCERNING RECEIVING WATER LIMITATIONS AS ADDRESSED IN ORDER NO. R4-2012-0175 - WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT, INCLUDING THE COUNTY OF LOS ANGELES, AND THE INCORPORATED CITIES THEREIN, EXCEPT THE CITY OF LONG BEACH

The City of Los Angeles (City) Bureau of Sanitation (Bureau) appreciates the opportunity to provide technical comments regarding the approach to receiving water limitations addressed in the Los Angeles Regional Water Quality Control Board (Regional Water Board) Order No. R4-2012-0175 and NPDES Permit NO. CAS004001 - Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Los Angeles County Flood Control District, Including the County of Los Angeles, and the Incorporated Cities Therein, Except the City of Long Beach (Order). The Bureau is providing technical comments in response to the questions related to the Order posed in the State Water Resources Control Board's July 8, 2013 transmittal. The Bureau appreciates the State Water Board considering the outcome of a process the Regional Water Board staff dedicated significant efforts to and provided the City the opportunity for substantial engagement and input on.



The Bureau would like to express our support for the watershed management program (WMP) and enhanced watershed management program (EWMP). The WMP and EWMP approaches as outlined in the Order provides a mechanism and certainty by which we can meet the water quality objectives of the permit. It provides the time necessary to coordinate with other permittees and organizations for large scale water quality improvement and multi-benefit projects.

A key aspect of the Order is the inclusion of clear steps to the implementation provisions of the Receiving Water Limitations to help the Permittees focus on established watershed priorities and ensure consistency with TMDL provisions. The process in the Order provides a clear approach to conduct the necessary analysis, identify appropriate BMPs, and implement those BMPs in a timely manner. It provides our staff the guidance necessary to apply the best available planning tools and science to prepare effective management programs to address exceedances of receiving water limitations whether or not they are addressed by an existing TMDL. The approach presents the City and partners' certainty to meeting the objectives of the Order through major, but not insurmountable, technical challenges which require us to:

- Develop management programs tailored to very different watersheds using approaches vetted by external experts and stakeholders,
- Expend significant internal and external resources to develop and implement the programs,
- Design our programs to incorporate significant amounts of new data, and
- Adapt and refine our programs to better address receiving water issues.

The Bureau is committed to meet this challenge and has volunteered to take the lead role in the development of EMWPs across four watersheds in collaboration with 22 other cities, the County, and the Flood Control District. The Bureau has supported the watershed approach throughout the development of the Order and feels these elements were a welcomed, necessary and important shift in the implementation of stormwater programs in the Los Angeles Region.

As an example, Elmer Avenue demonstrates on a small neighborhood scale what will be done in a grand approach through EWMPs to achieve the objectives of the Order. Elmer Avenue was completed with the following partners: City of Los Angeles, Council of Watershed Health, U.S. Bureau of Reclamation, Metropolitan Water District of Southern California, Los Angeles Department of Water and Power, Los Angeles County Department of Public Works, TreePeople, Urban Semillas, City of Santa Monica, and additional funding from California Department of Water Resources. The project captures stormwater runoff, increases water conservation, reduces pollution to the Los Angeles River, restores habitat, adds green space, and beautifies the community. It may increase property values of the homes nearby. This project has been recognized through awards locally and nationally.

Other recognized and key projects include rehabilitation of Echo Park Lake and Machado Lake, upgrading and building low flow diversions in the Santa Monica Bay watershed, and utilizing LID principles such as permeable pavement and bioretention cells to retrofit the Los Angeles Zoo parking lot. Other efforts include development and implementation of Green Street

Emel G. Wadhvani
August 8, 2013
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Standard Plans, and passage of the landmark Low Impact Development Ordinance (LID), effective in May 2012. The Bureau is currently updating the ordinance for consistency with the Order.

That being said, all the projects and efforts described above take time, and the WMP/EWMP approach provides a constructive, comprehensive, and appropriate approach for complying with the Receiving Water Limitation provision and other provisions of the Order.

In closing, we would like to express our appreciation for the efforts of the Regional Water Board staff. In particular the efforts of Sam Unger, Deb Smith, and Renee Purdy lead to the development of a thoughtful process that we are in the process of implementing via the development of EWMPs.

Please contact me at (213) 485-0587 or via e-mail at Shahram.Kharaghani@laicty.org if you have any questions.

Sincerely,



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Exhibit B – MS4 Dischargers List

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