



## California Stormwater Quality Association®

*Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation*

March 27, 2014

Jeannine Townsend  
Clerk to the Board  
California State Water Resources Control Board



**SUBJECT:** Consideration of Proposed Order for State Water Board Review On Its Own Motion of Waste Discharge Requirements Order No. R4-2012-0175 [NPDES No. CAS004001] for Municipal Separate Storm Sewer System (MS4) discharges within the Coastal Watersheds of Los Angeles County - except those originating from the City of Long Beach: SWRCB/OCC Files A--2236(a) Through (kk)

Dear Ms. Townsend:

The California Stormwater Quality Association (CASQA) has reviewed the State Water Resources Control Board's (State Water Board) Proposed Order for State Water Board Review On Its Own Motion of Waste Discharge Requirements Order No. R4-2012-0175 [NPDES No. CAS004001] for Municipal Separate Storm Sewer System (MS4) discharges within the Coastal Watersheds of Los Angeles County - except those originating from the City of Long Beach: SWRCB/OCC Files A--2236(a) Through (kk) (Draft Own Motion Order). CASQA does not oppose the State Water Board's Draft Own Motion Order, and understands the State Water Board's need for some additional time to address the numerous issues identified in the various petitions.

However, CASQA encourages the State Water Board to move as quickly as possible with respect to the important issues associated with the petitions pertaining to the MS4 Permit for the Coastal Watersheds of Los Angeles County (excepting the City of Long Beach). Specifically, CASQA encourages the State Water Board to address the pivotal receiving water limitations issues that have been raised in the LA MS4 Permit proceedings. Many municipalities and other regional water quality control boards are waiting for the State Water Board's input on this key issue.

Accordingly, while we understand the State Water Board's need for some additional time, we respectfully ask that the State Water Board consider adding a schedule commitment to its Own Motion authority so as not to delay decisions with respect to the LA MS4 permit petitions any more than necessary. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerhardt J. Hubner".

Gerhardt Hubner, Chair  
California Stormwater Quality Association

cc: CASQA Board of Directors and Executive Program Committee