

DEPARTMENT OF PUBLIC WORKS

May 18, 2015

Mr. Man Voong
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

RE: Comment Letter – Los Angeles River Trash TMDL

Dear Mr. Voong:

The City of Pasadena values the opportunity to provide comments on the Proposed Amendment to the *Water Quality Control Plan for the Los Angeles Region* to revise the Los Angeles River Watershed Trash Total Maximum Daily Load (TMDL). The comments below are made in response to the Regional Board's "Attachment A to Resolution No. R15-XXX." The City of Pasadena has specific concerns in three key areas that are outlined as follows:

Catch Basin Retrofit Compliance

On pages 4 and 5, the proposed language states that in drainage areas where the vast majority of catch basins are retrofitted with a trash Full Capture System (FCS) and retrofit of the remaining catch basins is technically infeasible, then the agency may request that the Executive Officer determine that they are in full compliance if certain criteria are met. However, the proposed criteria include a requirement that 97 to 98 percent of the drainage area/catch basins are retrofitted with a FCS. It should be noted that many catch basins, especially in older cities such as Pasadena, are too small to be effectively retrofitted with the current standard of full capture systems. Therefore, the 97 to 98 percent criterion is not achievable, and it is suggested that it be lowered to reflect a more realistic percentage of catch basins that can be retrofitted. In Pasadena, that amount should be 75 percent.

Waste Load Allocation (WLA) for Flood Control Districts

On page 7, the proposed language states that flood control districts, such as the Los Angeles County Flood Control District (LACFCD), are not assigned a WLA since the WLAs are based on jurisdictional area. It should be noted that placing the full responsibility for compliance with the Trash TMDL, including the resulting legal liability due to potential flooding, on cities is not reasonable. In addition, the LACFCD actually owns and maintains about half of the storm drain facilities located within the City of Pasadena. Further, the City of Pasadena has been working with other cities, including the Cities of Alhambra, Arcadia, Burbank, Glendale, and La

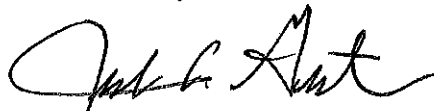
Canada Flintridge, to try to work with the Regional Board and Los Angeles County regarding this issue without any resolution. It is suggested that the LACFCD should be responsible for complying with the Trash TMDL for all of their storm drain facilities, regardless of where they happen to be located.

Receiving Water Monitoring

On page 9, the proposed language states that permittees shall propose and implement a trash monitoring plan for approval by the Executive Officer. The original intent of the LAR Trash TMDL was to prevent trash from entering the storm drain system by installing full-capture trash devices or other best management practices to control point source discharges by retrofitting storm drain inlets. However, the proposed receiving water monitoring of trash will not be representative of point source discharges, as the receiving water collects trash from other sources beyond the control of the City of Pasadena. Therefore, it is suggested that the receiving water monitoring requirement be removed, which will allow agencies to focus resources on more effective trash removal efforts.

The City of Pasadena appreciates the opportunity to provide comments on this matter. If you have any questions, please contact Mr. Stephen Walker at 626-744-4271 or by electronic mail at swalker@cityofpasadena.net.

Sincerely,



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Assistant City Manager

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Steven L. Wright, City Engineer
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Stephen Walker, Principal Engineer