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June 23, 2014

Mr. Sam Unger
Los Angeles Regional Water Quality Board
320 West 4th street, Suite 200
Los Angeles, CA 90013

Attn: Rebecca Christmann

Dear Mr. Unger,

PROPOSED ISSUANCE OF TIME SCHEDULE ORDER (TSO) REQUIRING COUNTY OF LOS ANGELES, THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT (LACFCD), AND THE CITY OF LOS ANGELES TO COMPLY WITH REQUIREMENTS PERTAINING TO DISCHARGES OF BACTERIA DURING DRY WEATHER TO THE BACK BASINS OF MARINA DEL REY AND MARINA BEACH PRESCRIBED IN MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT ORDER NO. R4-2012-0175 (NPDES PERMIT NO. CAS004001)

The City of Los Angeles Bureau of Sanitation (Bureau) appreciates the opportunity to comment on the proposed TSO for meeting the dry weather compliance requirements of the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL.

To meet the dry weather Waste Load Allocations (WLAs) of the Total Maximum Daily Load (TMDL) for Marina del Rey Harbor, the Los Angeles County and the LACFCD together with the support of the Bureau and other responsible agencies have implemented structural and institutional measures and conducted extensive studies including a non-point source study in consultation with the Los Angeles Regional Board staff. In addition, the LACFCD is moving forward with the construction of the Oxford Retention Basin Multiuse Enhancement Project, which is a project serving a large portion of the Marina del Rey watershed. Completion of this project will by the end of 2015, and it is anticipated that this project will provide significant benefits to mitigating bacterial pollution at the back basins.

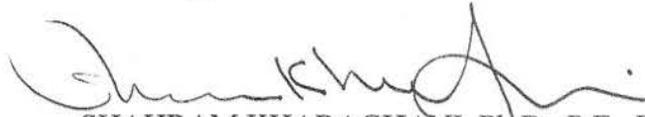
The Bureau is committed to meeting the compliance requirements of the Bacteria TMDL for the Marina del Rey Back Basins and requests approval of the proposed TSO. Given the small number of data points and the variability of the Exceedance Day dataset, it may be appropriate to consider alternative approaches for calculating the TSO limits. We would appreciate the opportunity to discuss these alternatives with Regional Board staff, and would like to continue the interactions with Regional Board staff to ensure the successful implementation of the actions in the proposed TSO.



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If you have any questions, please contact Dr. Hubertus Cox, at (213) 485-3984 or Hubertus.Cox@lacity.org.

Sincerely,



SHAHRAM KHARAGHANI, Ph.D., P.E., BCEE
Program Manager

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WPDCR9129

- c: Deb Smith, California Regional Water Quality Control Board, Los Angeles Region
- Renee Purdy, California Regional Water Quality Control Board, Los Angeles Region
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- Gary Hildebrand, Assistant Deputy Director, Watershed Management Division, LA County Public Works
- Bruce Hamamoto, Watershed Management Division, LA County Public Works
- Frank Wu, Watershed Management Division, LA County Public Works