



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE
REFER TO FILE: WM-9

August 11, 2016

Mr. Samuel Unger, P.E.
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Attention Chris Lopez

Dear Mr. Unger:

COMMENT LETTER – LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT TRASH TOTAL MAXIMUM DAILY LOAD REOPENER

The County of Los Angeles (County) and the Los Angeles County Flood Control District (LACFCD) support the proposed amendment to the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit (NPDES No. CAS004001, Order No. R4 2012-0175) to incorporate modifications consistent with the recently revised Total Maximum Daily Loads (TMDLs) for Trash in the Los Angeles River and Ballona Creek Watersheds.

As previously communicated to the Regional Water Quality Control Board and State Water Resources Control Board during the Trash TMDLs reconsideration process, the County and the LACFCD have invested significant resources over the last ten years to implement trash reduction best management practices. In addition, the LACFCD has actively worked with the County and the Cities in facilitating the installation of trash control devices on LACFCD-owned infrastructure. Despite these efforts, technical infeasibilities have precluded the installation of full-capture or partial capture trash devices in a limited number of catch basins. The revised TMDLs include alternate compliance pathways in recognition of these challenges. The County and the LACFCD support the alternative compliance approach and its timely incorporation into the MS4 Permit.

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If you have any questions, please contact me at (626) 458-4300 or ageorge@dpw.lacounty.gov or your staff may contact Mr. Paul Alva at (626) 458-4325 or palva@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



ANGELA R. GEORGE
Assistant Deputy Director
Watershed Management Division

GA:ba

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cc: County Counsel (Lillian Salinger)