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August 3, 2015

Mr. Samuel Unger, Executive Officer
California Regional Water Quality Control Board – Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Unger,

**RESPONSE TO PETITION FOR REVIEW OF LOS ANGELES REGIONAL WATER
QUALITY CONTROL BOARD EXECUTIVE OFFICER'S ACTION TO APPROVE
NINE WATERSHED MANAGEMENT PROGRAMS**

On July 3, 2015, the Los Angeles Regional Water Quality Control Board issued a notice of opportunity to respond to the petition for review of its Executive Officer's action to approve, with conditions, nine Watershed Management Programs pursuant to the Los Angeles County Municipal Separate Storm Sewer System Permit (MS4 Permit). The City of Los Angeles, in coordination with the Los Angeles County Flood Control District, developed the Watershed Management Program for the City of Los Angeles area in Santa Monica Bay Watershed Jurisdiction 7.

This letter is to support the Executive Officer's action to conditionally approve the Santa Monica Bay Watershed Jurisdiction 7 as well as the remaining eight Watershed Management Programs. These programs are detailed documents outlining compliance measures and schedules for implementation in accordance with the requirements of the MS4 Permit. In addition, the Watershed Management Programs underwent a rigorous review process by the Los Angeles Regional Water Quality Control Board, which included the opportunity for public participation. Accordingly, the nine Watershed Management Groups revised their Watershed Management Program after receiving the initial comments from the Los Angeles Regional Water Quality Control Board and, once again, after receiving the conditional approvals. The conditional approval letter for the City of Los Angeles area in Santa Monica Bay Watershed Jurisdiction 7 did not require fundamental changes. Rather, the requested revisions focused on providing additional information and correcting typographical errors.



The Watershed Management Programs are the result of extensive collaboration among permittees and they provide a path forward to address the quality of water discharged from the MS4 and the requirements of the MS4 Permit. Denying these plans, particularly where the conditional approval simply requested minor clarifications or editorial revisions, as requested in the petition would delay the progress that has been made so far as well as endanger timely implementation. Accordingly, we support the Executive Officer's action to conditionally approve the Watershed Management Programs.

Sincerely,



SHAHRAM KHARAGHANI, Ph.D., PE, BCEE
Program Manager

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c: Deborah Smith, Los Angeles Regional Water Quality Control Board
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