



City of Sierra Madre

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August 15, 2013

Emel G. Wadhvani
California State Water Resources Control Board
Senior Staff Counsel
P. O. Box 100
Sacramento, CA 95812-0100

Dear Mr. Wadhvani:

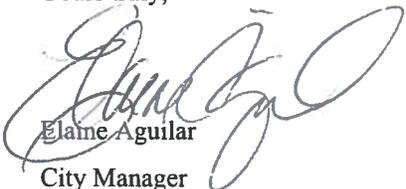
Subject: SWRCB/OCC FILE A-2236(a) THROUGH (KK)

COMMENTS IN RESPONSE TO QUESTIONS POSED BY THE STATE WATER RESOURCES CONTROL BOARD CONCERNING RECEIVING WATER LIMITATIONS AS ADDRESSED IN ORDER NO. R4-2012-0175 – WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT, INCLUDING THE COUNTY OF LOS ANGELES, AND THE INCORPORATED CITIES THEREIN, EXCEPT THE CITY OF LONG BEACH

The City of Sierra Madre appreciates the opportunity to provide comments on whether the Watershed Management Program (“WMP”) and Enhanced Watershed Management Program (“EWMP”) compliance alternatives contained in the Los Angeles MS4 Permit are an appropriate approach to implement receiving water limitations in other MS4 permits across the state. The City supports the WMP and EWMP compliance alternatives in the Los Angeles MS4 Permit, which are a carefully drafted and compliance oriented water quality management tool that will ensure improvement of surface water quality while providing the opportunity to increase the local water supply for the region. A similar approach, such as the “strategic compliance program” being proposed by the California Stormwater Quality Association (CASQA) in its comment letter to the Board dated August 15, 2013, would also be appropriate in MS4 permits.

The WMP and EWMP approach is a legally valid and enforceable way to achieving receiving water limitations. It does not violate the Clean Water Act but instead follows relevant guidance and precedent while remaining faithful to the mandates and requirements of anti-backsliding, anti-degradation, and total maximum daily loads. The approach provides a mechanism by which permittees can meet the water quality objectives of the permit, but with the certainty that they will not be subject to the threat of third party lawsuits while developing and implementing a WMP or EWMP. The City is particularly pleased to be participating in a EWMP together with several other cities in its watershed, as this allows the City and its partners to implement a comprehensive, watershed-based management program which will focus on established watershed priorities and ensure consistency with TMDL provisions.

Yours truly,



Elaine Aguilar
City Manager