



# City of Arcadia

## Office of the City Manager

Donald Penman  
*City Manager*

July 22, 2009

Ivar Ridgeway ✓  
Storm Water Permitting Unit  
CRWQCB, Los Angeles Region  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

SUBJECT: MODIFICATIONS TO WASTE DISCHARGE REQUIREMENTS FOR  
(NPDES NO. CAS004001) TO INCORPORATE PROVISIONS OF  
THE LOS ANGELES RIVER WATERSHED TRASH TOTAL  
MAXIMUM DAILY LOAD (TMDL)

RECEIVED  
2009 JUL 27 AM 10:00

Dear Mr. Ridgeway:

The City of Arcadia is located in the Los Angeles River Watershed and is in receipt of your notice of July 6, 2009 regarding the possible incorporation of the Los Angeles River Trash TMDL into the Los Angeles County MS4 Permit. The City of Arcadia acknowledged that on August 9, 2007 the Regional Board adopted the Los Angeles River Watershed Trash TMDL. Therefore, we have made great efforts to improve water quality in support of the Trash TMDL objective. Specifically, we have installed 108 full capture catch basin inserts in City owned Catch Basins. Additionally, we will continue to install full capture devices to prevent pollution of the Los Angeles River.

Our City takes pride in its environmental programs and values the importance of decreasing the amount of trash discharges into the storm drain system in order to protect the recreation and aquatic life in the Los Angeles River Watershed. Despite the economic recession and the difficulty that our City is having in funding basic municipal services, the City continues making great efforts in implementing both TMDL and NPDES permit programs. All of our efforts have been made without the Regional Board formally placing the TMDL into our stormwater permit. We are very concerned about the reopening of our NPDES permit to insert the TMDL and its numeric limits. We believe that the Board should use a more collaborative approach with cities to achieve the desired environmental outcome.

We would also like the Regional Board to consider the cost associated with Trash TMDL BMPs. Since the City has implemented Full Capture Catch Basin Devices, we are now struggling to generate revenue to fund additional expenses in maintaining these devices. Although the County of Los Angeles cleans the catch basins once annually, this is not enough. We also perform street sweeping on a weekly basis in order to enhance the effectiveness of the catch basin inserts. However, as with all pollution prevention programs, costs will continue to increase as state mandates become more stringent.

The City of Arcadia supports trying to decrease the amount of trash entering the storm drain system, but would like the Regional Board to reconsider placing the Trash TMDL in the LA County MS4 permit. We look forward to participating in the Board's ongoing efforts and hope that our concerns will be considered. Please feel free to contact Carmen Trujillo, Management Aide at (626) 256-6551 if you have any questions or comments.

Sincerely,

*Donald Penman*

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