

Los Angeles



Stormwater Quality
Partnership

Partner Cities:

Agoura Hills

Azusa

Beverly Hills

Calabasas

Hidden Hills

Monrovia

Norwalk

Rancho Palos Verdes

Westlake Village

November 5, 2009

Mr. Ivar Ridgeway
Regional Water Quality Control Board – Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Comments regarding incorporating the provisions of the Los Angeles River Trash TMDL into the Los Angeles County MS4 permit

Dear Mr. Ridgeway:

Thank you for this opportunity to provide comments regarding incorporating the provisions of the Los Angeles River Trash Total Maximum Daily Load (TMDL) into the current Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit (Permit). As you may be aware, representatives and members of the Los Angeles Stormwater Quality Partnership (LASQP) attended the July 29, 2009 staff workshop and submitted written comments on the subject on July 28, 2009.

This group of nine Los Angeles County cities was formed with the intent of establishing a continuing and sustained working relationship between the municipal stormwater permittees and the California Water Quality Control Board for the Los Angeles Region (Regional Water Board). It is hope and goal to form a relationship focused on improving stormwater quality through a constructive and collaborative effort. In that spirit, and in our communications to the Regional Water Board on this matter, we have encouraged Regional Water Board staff to consider and incorporate two specific elements. These were to:

1) Explicitly recognize and include the TMDL review / reconsideration step at the sustained 50% reduction mark; and

2) Allow for options in demonstrating achievement with Waste Load Allocation (WLA), i.e., "compliance monitoring", including quantification of reductions from full capture, partial capture, institutional controls, and other equivalents.

LASQP recognizes and appreciates that these have in fact been explicitly incorporated into the proposed Permit revisions. Regarding the first element, the review / reconsideration step is critical to both our and the Regional Water Board's ability to adaptively manage implementation of the TMDL. LASQP is willing to work with Regional Water Board staff to provide further clarification of the concept of a "sustained" reduction for purposes of review / reconsideration of the TMDL and its effectiveness.

LASQP comments regarding incorporating the provisions of the Los Angeles River Trash TMDL into the Los Angeles County MS4 permit

Regarding the second element, providing options for demonstrating WLA achievement, such as through full capture, partial capture, and institutional controls, is also critical since many cities' trash-related characteristics differ (sources, amounts, locations, impacts, infrastructure, financing, etc.), however as the TMDL is implemented, cities will likely need to adapt their implementation actions and will need access to all options for demonstrating WLA achievement.

Thank you for the opportunity to provide input regarding incorporating the provisions of the Los Angeles River Trash TMDL into the Los Angeles County MS4 permit. We look forward to continuing to work with you as these new permit provisions continue to be implemented. Feel free to contact me with questions.

Sincerely,
Los Angeles Stormwater Quality Partnership

A handwritten signature in black ink, appearing to read "Geoff Brosseau", with a stylized flourish at the end.

Geoff Brosseau
Environmental Management / Technical Consultant

cc: LASQP Member Cities