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August 28, 2017

Sam Unger
Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200. Los Angeles, CA 90013

RE: Notice of Opportunity for Public Comment on Proposed Alternative Biofiltration Design Specification

Dear Mr. Unger,
Thank you for considering approval of the Filterra Bioretention System as an equivalent alternate to conventional biofiltration as described in Attachment H of the Los Angeles Regional MS4 permit. The land development community needs reliable flow-through BMPs for applications where infiltration and rainwater harvesting are infeasible. And, it is important that any approved on-site alternatives to retention are highly effective at removing conventional stormwater pollutants and are adequately protective of receiving waters. When properly designed, constructed and maintained, conventional biofilters can provide this safeguard. However, as the Filterra application demonstrates, other systems can provide similar or greater water quality benefit and runoff reduction with improved site design flexibility, simplified maintenance and greater reliability. In particular, the Filterra Bioretention System provides the following advantages which accrue to developers, Los Angeles area Permitees and the general public.

Compact designs encourage development density

> A compact biofiltration solution is especially important on urban infill and redevelopment projects where greater development density supports smart growth objectives. It is important to note that compact stormwater management systems like Filterra do not necessarily mean less landscaping area, since local zoning regulations dictate landscape area minimums. However, compact options do allow more flexibility in meeting landscaping requirements, for example to use larger trees that intercept rainfall and mitigate heat island effect or to use plants that don't need to be able to withstand prolonged inundation. Also, by virtue of their relatively small size, Filterra systems require less potable water to survive the dry season. This saves the site owner money and supports water conservation goals in the Los Angeles region.

Consistency in design and procurement yield consistent performance

> Filterra offers a level of quality control that is not available from conventional biofiltration, which is typically described in civil engineering specifications by a design engineer who has little control over material procurement and installation decisions. Those decisions are typically handled by the construction contractor who must source appropriate compost and sand materials from among local options that often vary widely with respect to particle size distribution and chemical composition. Although engineering specifications, such as those in Attachment H of the Los Angeles Region MS4 permit attempt to control variability, performance of completed systems varies much more widely than for Filterra. Strict QA/QC testing is completed before, during, and after all Filterra media batches are blended to ensure that

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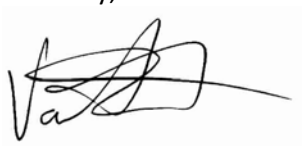
specifications are met. Certifications can be provided upon request. Media is either factory installed in the Filterra system, or installed by Contech representatives in the field to ensure proper installation.

Compact design means lower maintenance costs and lower potable water demand

Filterra maintenance is typically required 1-2 times per year depending on annual rainfall, and includes removing and replacing the mulch layer. By virtue of its smaller size and precise maintenance protocol, maintenance costs are easy to plan for and are relatively low. Filterra use also concentrates captured stormwater borne pollutants in a small easily maintained area rather than distributing them throughout a wider landscaped area. Between maintenance events, captured pollutants are less susceptible to export by wind and wildlife and less likely to come into contact with humans.

In light of these benefits and the performance capabilities of the Filterra system demonstrated in the "Filterra Equivalency Analysis and Design Criteria" report, we strongly support approval of the Filterra system when designed following the methodology described in section 4 of that report.

Sincerely,



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Director - Stormwater Regulatory Management

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