



Las Virgenes – Triunfo Joint Powers Authority
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818.251.2100



September 16, 2014 [submitted electronically to losangeles@waterboards.ca.gov]

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

Subject: LA County MS4 Permit – Comments on Malibu Creek Watershed MS4 Permit – Comments on Malibu Creek Watershed Monitoring Program

Dear Mr. Ridgeway:

Thank you for this opportunity to comment on the draft Enhanced Watershed Management Plan (EWMP) Work Plan for the Malibu Creek watershed. We recognize and acknowledge the immense effort and amount of time spent by both permittees and Regional Board staff in developing and complying with this permit.

Following is a description of the JPA's major concerns with the EWMP Work Plan.

- 1. Tapia Water Reclamation Facility cannot accept stormwater or dry weather flows, so those should not be included in the EWMP Work Plan.**

The EWMP Work Plan discusses the potential diversion of stormwater and non-stormwater runoff to the sanitary sewer system for treatment by the Tapia Water Reclamation Facility (WRF) in multiple locations. JPA staff met with the permittees' consultant, RBF Consulting, on March 13, 2014 and communicated hydraulic and treatment limitations at the plant. Additional stormwater could overwhelm the system and jeopardize the ability to adequately treat water to quality standards. Both stormwater and dry weather flows could also introduce contaminants that could upset the plant's biological treatment system. Accepting diversions opens the JPA to increased risk of potential NPDES violations. We request that all instances where diversions to the sanitary sewer system and Tapia WRF be deleted.

- 2. The EWMP Work Plan should not include non-structural source control BMPs related Tapia WRF discharge or operations.**

The EWMP Work Plan states that non-structural source control BMPs will be favored in a number of instances including "discharges from the Tapia Water Reclamation Facility (WRF)." Tapia WRF discharge should be excluded as a potential source of pollutants to the MS4 from the EWMP Work Plan as it is (1) not stormwater runoff, so is not relevant to the MS4 permit, (2) not conveyed to surface waters through an MS4 and (3) it is regulated under its own NPDES discharge permit (CA0056014).

- 1. The EWMP Work Plan should not include enhanced treatment of recycled water used for irrigation as a non-structural source control BMPs.**

Charles Caspary
Chair, Las Virgenes-Triunfo
Joint Powers Authority
President, Las Virgenes Municipal Water District
Board of Directors

Steve Iceland
Vice Chair, Las Virgenes-Triunfo
Joint Powers Authority
Chair, Triunfo County Sanitation District
Board of Directors

The EWMP Work Plan includes “enhanced treatment of recycled water used for irrigation” as a potential source control BMP. Recycled water quality is not in itself subject to MS4 regulation. Recycled water use is already regulated under a Waste Discharge/Water Reclamation Requirements permit. Additional treatment by the JPA would impose an undue burden of cost.

More detailed comments by section and page location are given in the attachment to this letter and are intended to improve the clarity and accuracy of the EWMP Work Plan.

If you have any questions, please feel free to call Dr. Randal Orton or Jan Dougall at (818) 251-2100.

Sincerely,

A handwritten signature in black ink that reads "David W. Pedersen" with a stylized flourish at the end.

David W. Pedersen, P.E.

General Manager, Las Virgenes Municipal Water District

Administering Agent, Las Virgenes – Triunfo Joint Powers Authority