



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

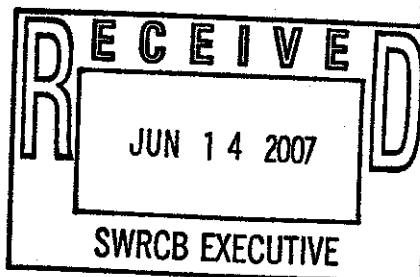
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ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

6/28/07 Workshop  
**WQ Enforcement**  
Deadline: 6/14/07 Noon

DONALD L. WOLFE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

June 14, 2007



IN REPLY PLEASE  
REFER TO FILE: WM-9

Ms. Dorothy Rice  
Executive Officer  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Dear Ms. Rice:

### STATE WATER RESOURCES CONTROL BOARD WATER QUALITY ENFORCEMENT POLICY

The County of Los Angeles Department of Public Works appreciates the opportunity to provide the following preliminary comments on the Water Quality Enforcement Policy (Enforcement Policy) dated February 19, 2002, in advance of the June 28, 2007, workshop. We expect there will be an opportunity to submit final comments following this workshop. Our preliminary comments are as follows:

1. In general, we are in support of the Enforcement Policy's stated goal.
2. The County of Los Angeles strives to comply with all environmental regulations. We are also continuously working with both the State Board and Regional Board staff to establish achievable standards that are protective of receiving water quality. Recent trends show that standards are being set without consideration to their achievability. Unachievable standards inevitably lead to violations and unnecessarily drain the State's limited enforcement resources. We recommend this issue be added as a topic of discussion at the workshop.
3. Section I.D describes "progressive enforcement" as "an escalating series of actions that allows for the efficient and effective use of enforcement resources to ... assist cooperative dischargers in achieving compliance..." We encourage both State Board and Regional Board staff to place more emphasis on this first step in progressive enforcement to foster a more collaborative relationship with dischargers.

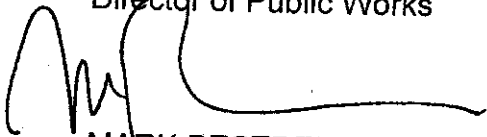
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4. Section IV.B describes "Verbal Enforcement Actions and Enforcement Letters" as "an informal enforcement action... to quickly bring a violation to the discharger's attention and to give the discharger an opportunity to return to compliance as soon as possible." It is our experience that this enforcement mechanism is under-utilized by both the State Board and Regional Board.

I look forward to the opportunity to discuss these and other related issues at the June 28 workshop. Should you have any questions, please contact me at (626) 458-4358 or [fwu@dpw.lacounty.gov](mailto:fwu@dpw.lacounty.gov).

Very truly yours,

DONALD L. WOLFE  
Director of Public Works



MARK PESTRELLA  
Assistant Deputy Director  
Watershed Management Division

FW:sv

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