



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE

REFER TO FILE: WM-9

August 3, 2009

Ms. Tracy Egoscue
Executive Officer
California Regional Water Quality
Control Board – Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013-2343

Attention Mr. Ivar Ridgeway

Dear Ms. Egoscue:

**WORKSHOP FOR THE INCORPORATION OF THE LOS ANGELES RIVER
TRASH TOTAL MAXIMUM DAILY LOAD INTO THE LOS ANGELES COUNTY
MUNICIPAL STORMWATER NATIONAL POLLUTANT DISCHARGE ELIMINATION
SYSTEM PERMIT**

The County of Los Angeles (County) appreciates the opportunity to comment on this matter.

First, we submit that the appropriate procedure to follow is to have the Los Angeles County Municipal Stormwater Permit reflect the provisions of the Los Angeles River Trash Total Maximum Daily Load (TMDL) at the time the permit is renewed. The past practice of reopening the permit to reflect individual TMDLs has resulted in piecemeal and uncoordinated approaches to pollution control. The same outcome could occur here. A better approach would be to have a planned, comprehensive approach for implementation of TMDLs that is reflected in the renewed permit when it is issued. As the California Regional Water Quality Control Board (Regional Board) is aware, the County has been voluntarily implementing the trash TMDL even without it being incorporated into the permit. We believe other permittees are likewise already complying. Therefore, there is no need for a piecemeal approach.

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If the Regional Board rejects this suggestion and insists on incorporating TMDLs piecemeal, then the Los Angeles River Trash TMDL should be incorporated through reference to Best Management Practices specifically compliance through installation of the full-capture system. The Los Angeles River Trash TMDL allows dischargers to achieve compliance through a full-capture system as defined by the TMDL. This provision gives dischargers a realistic and tangible means by which to obtain regulatory compliance.

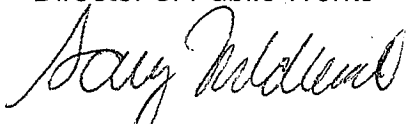
In a letter dated August 1, 2007, the Regional Board certified the County's connector pipe screen (CPS) device as a full-capture system for trash removal under the Ballona Creek and the Los Angeles River Trash TMDLs. To date, we have installed 586 CPS devices and over 1,500 automatic retractable screens in the unincorporated County area's catch basins in the Los Angeles River Watershed.

The County is committed to improving receiving water quality and improving the quality of life for our residents. Thank you for the opportunity to comment.

If you have any questions, please contact me or your staff may contact Mr. Hector Bordas at (626) 458-5947 or hbordas@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



GARY HILDEBRAND
Assistant Deputy Director
Watershed Management Division

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