



CITY OF BRADBURY

Incorporated July 26, 1957

August 15, 2013

Emel G. Wadhvani
California State Water Resources Control Board
Senior Staff Counsel
P. O. Box 100
Sacramento, CA 95812-0100

Via email: ewadhvani@waterboards.ca.gov

Dear Mr. Wadhvani:

**Subject: SWRCB/OCC FILE A-2236(a) THROUGH (KK)
COMMENTS IN RESPONSE TO QUESTIONS POSED BY THE STATE WATER
RESOURCES CONTROL BOARD CONCERNING RECEIVING WATER LIMITATIONS AS
ADDRESSED IN ORDER NO. R4-2012-0175 – WASTE DISCHARGE REQUIREMENTS FOR
MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE LOS
ANGELES COUNTY FLOOD CONTROL DISTRICT, INCLUDING THE COUNTY OF LOS
ANGELES, AND THE INCORPORATED CITIES THEREIN, EXCEPT THE CITY OF LONG
BEACH**

The City of Bradbury appreciates the opportunity to provide comments on whether the Watershed Management Program (WMP) and Enhanced Watershed Management Program (EWMP) compliance alternatives contained in the Los Angeles MS4 Permit are an appropriate approach to implement receiving water limitations in other MS4 permits across the state. The City of Bradbury supports the WMP and EWMP compliance alternatives in the Los Angeles MS4 Permit, which are a carefully drafted and compliance oriented water quality management tool that will ensure improvement of surface water quality while providing the opportunity to increase the local water supply for the region. A similar approach, such as the “strategic compliance program” being proposed by the California Stormwater Quality Association (CASQA) in its comment letter dated August 15, 2013, would also be appropriate in other MS4 permits.

While Bradbury supports the overall efforts of water quality and environmental programs, the City has become increasingly concerned about with the Receiving Water Limitations language in municipal stormwater permit. At this time, the WMP and EWMP approach allows cities to

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provide clear objectives for achieving receiving water limitations. The approach not only provides a mechanism by which permittees can meet the water quality objectives of the permit, but also allow permittees to focus on established watershed priorities and ensure consistency with TMDL provisions and allows cities to direct limited financial resources in a way that addressed the most pressing water quality priorities for the benefit of the taxpayer.

The City thanks the state Water Board for consideration of these comments. Please contact City Manager Michelle Keith at (626) 358-3218 if you have any questions regarding the information provided in this letter.

Sincerely,

/S/

Michelle Keith

City Manager