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August 1, 2014



Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I St, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

Comment Letter – Draft Utility Vaults Permit

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to comment on the current Draft Utility Vaults and Underground Structures to Surface Waters (Draft Permit). LADWP commends the efforts of the State Water Resources Control Board staff (Board staff) to work with the stakeholders on the development of the current Draft Permit. The collaborative effort on this Draft Permit by Board staff has yielded a productive outcome.

LADWP supports the draft permit as written but does have one comment that it would like to further discuss as outlined below.

VII. Provisions, C. Special Provisions 3. Best Management Practices and Pollution Prevention ii. Identification of Potential Pollutant Source (b) Drainage Map.

Provide a map showing (1) the Discharger service area within a specific Regional Water Board boundary and (2) the corresponding major surface water bodies and watersheds to which utility vault or underground structure water may discharge. Map features must also include ASBS boundaries, MS4 discharge points to the ASBS, and major roadways.

This requirement is troublesome because the vaults are part of the electrical system. Due to security reasons and grid reliability, LADWP is concerned with releasing this type of detailed information.

Since there are serious security issues with providing such a map, LADWP suggests that any information that details locations of the vaults be requested only when necessary and under confidentiality.

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Conclusion

Thank you again for this opportunity to provide comments. LADWP also supports and agrees with the letter submitted by the Utility coalition. Should you have any questions regarding this letter, please contact Ms. Charlynn Rachell of the Wastewater Quality and Compliance Group at (213) 367-2976.

Sincerely,



Katherine Rubin
Manager of Wastewater Quality and Compliance

KR:lr

c: Mr. Mark J. Sedlacek, Los Angeles Department of Water and Power (LADWP)
Ms. Charlynn Rachell, LADWP