



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Via Electronic Mail

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

**Comment Letter – Proposal to Develop a Storm Water
Program Workplan and Implementation Strategy**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the June 2015 Proposal to Develop a Storm Water Program Workplan and Implementation Strategy – Including Projects for Immediate Action (Proposal). The Sanitation Districts are a confederation of 24 independent special districts that provide for the water pollution control and solid waste management needs of approximately five million people in 78 cities and unincorporated areas of Los Angeles County, CA. The Sanitation Districts own and operate 11 wastewater treatment plants and maintain approximately 1,400 miles of sewer lines, which convey flows from industries and municipalities within service areas to the aforementioned wastewater treatment plants. Many wastewater treatment plants are willing to accept dry weather urban runoff and first flush storm water where sufficient capacity exists in the wastewater infrastructure, which would ultimately enhance beneficial use protection and augment recycled water opportunities but can introduce an additional unpredictable variable that may affect influent water quality. The following comments are respectfully submitted for this reason.

The Sanitation Districts agree that stormwater is a valuable resource that should be further developed, particularly in light of drought and climate change concerns. The Sanitation Districts therefore fully support the Proposal's focus on stormwater capture and reuse. We also agree that improving the efficiency and effectiveness of the Water Board's Storm Water Program is important, and that implementing true source control measures can result in appreciable improvement in storm water quality at a considerable cost savings compared to use of treatment. We therefore make the following recommendations in terms of prioritizing two specific projects:

- 1) The projects entitled "Urban Pesticide Reduction" and "True Source Control and Pollution Prevention" should be upgraded to the highest priority possible, due to their importance in leading to actual improvements in water quality. The Sanitation Districts strongly recommend that the Water Boards work with the California Department of Pesticide Regulation (CDPR) and the USEPA Office of Pesticide Programs (OPP) to ensure that pesticides are adequately regulated. It is the responsibility of CDPR and OPP to ensure that water quality is not adversely impacted by pesticide use. To this end, CDPR and USEPA have direct authority to regulate pesticide manufacturers and restrict pesticide products available for use. These authorities do not extend to the Water Boards or public agencies, including POTWs.

Therefore, the burden of resolving pesticide issues in water bodies should not be transferred to POTWs or storm water discharges, as local jurisdictions are not allowed to restrict or ban pesticide usage. The Water Boards should support efforts to ensure that federal and state pesticide regulatory programs are better aligned with water quality regulatory programs. More specifically, we recommend the following revisions:

- a. Table 1, Issue 40: The issue states that the State should play a key role or lead the effort to implement true source control. This issue is prioritized at a “Medium” level and should be upgraded to a “High” level. Without the State playing a key role or leading the effort, Issue 38 (true source control), which is listed as a “High” priority, would not be achievable.
- b. Table 4: Upgrade “Urban Pesticide Reduction” (Project 22) to “Very High Priority.” Upgrade “True Source Control and Pollution Prevention” (Project 21) to “High Priority” and include it on the Immediate Action Projects List (Table 5).
- c. Table 7: In the minimum resources allocation scenario, Project 22 is removed from consideration. Due to the importance of this project, staff resources should be rearranged to provide staffing in Years 1 and 2.

If you have any questions or need further information, please contact Shannon Bishop at (562) 908-4288, extension 2843 or sbishop@lacsdsd.org.

Very truly yours,

Grace Robinson Hyde



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