

CITY OF LOS ANGELES
CALIFORNIA

Public Workshop
Revised Draft Phase II Small MS4 Permit
Deadline: 12/17/12 by 12 noon

BUREAU OF SANITATION

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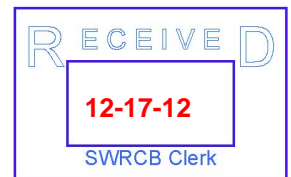


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December 17, 2012

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



Dear Ms. Townsend:

COMMENT LETTER – REVISED DRAFT PHASE II SMALL MS4 PERMIT

On behalf of the City of Los Angeles, Department of Public Works, Bureau of Sanitation we thank you for the opportunity to submit comments on the Draft Phase II Small Municipal Separate Storm Sewer Systems (MS4) Permit (Phase II Permit) with respect to the issue of including the Port of Los Angeles (Port) as part of this Permit. For the reasons stated below we request that the Port be removed from the Phase II MS4 Permit. We also express our support for the comments submitted by the Port on this matter.

As you may know, the Port of Los Angeles is a self-supported department of the City of Los Angeles and is located within the jurisdiction of the City of Los Angeles. As such, the Port is already regulated by the existing Phase I MS4 Permit for the County of Los Angeles. The Port is also contiguous to this urban area regulated by the Phase I MS4 Permit. The Port is subject to the Phase I MS4 Permit conditions, has to abide by all requirements that are within the urban area regulated by the Phase I MS4 Permit, and any Port activities are also subject to the permit's public agency requirements. The City's Stormwater Program and its staff have been closely working with the Port to ensure compliance with the Phase I MS4 Permit requirements such as public outreach and education, LID requirements, critical source designees, and illicit detection and elimination programs.

The Port is also integrated to the larger area and there are a number of TMDLs that are shared between the Port, and the surrounding municipalities. These TMDLs address bacteria, and toxic pollutants. As part of the TMDL compliance efforts, the City's stormwater program, the Port and other stakeholders have developed good working relationships. Shifting regulation of the



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Port to the Phase II Permit will jeopardize this relationship and complicate any TMDL compliance measures.

In summary, we request that the Port of Los Angeles be removed from the list of non-traditional permittees regulated under the Phase II MS4 Permit. If you have any questions regarding these comments, please contact Mr. Robert Vega of my staff at (213) 485-3991.

Sincerely,



SHAHRAM KHARAGHANI, Ph.D., P.E., BCEE
Program Manager

SK:RV:KK:WD
WPDCR9000

cc: Sam Unger, Los Angeles Regional Water Quality Control Board
Ivar Ridgeway, Los Angeles Regional Water Quality Control Board
Enrique Zaldivar, City of Los Angeles, Bureau of Sanitation
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