



**CITY of GARDENA**

1700 WEST 162<sup>nd</sup> STREET / GARDENA, CALIFORNIA 90247-3778 / PHONE (310) 217-9500  
WEB SITE: [www.ci.gardena.ca.us](http://www.ci.gardena.ca.us)

PAUL K. TANAKA, *Mayor*  
DAN MEDINA, *Mayor Pro Tem*  
TASHA CERDA, *Councilmember*  
RACHEL C. JOHNSON, *Councilmember*  
TERRENCE TERAUCHI, *Councilmember*

MINA SEMENZA, *City Clerk*  
J. INGRID TSUKIYAMA, *City Treasurer*  
MITCHELL G. LANSDELL, *City Manager*  
PETER L. WALLIN, *City Attorney*

August 13, 2013

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

Subject: File A-2236 through kk

Dear Mr. Wahdwani:

The City of Gardena (City) supports the attached comments regarding the State Water Resources Control Board's letter dated July 8, 2013 inviting petitioners and all interested parties to comment on the receiving water limitation language. The State Board's letter is specifically interested in knowing what the City's position is on the Los Angeles County MS4 permit's watershed management program (WMP) and enhanced watershed management program (EWMP) as appropriate approaches to meeting receiving water limitation provisions.

The attached comment letter in very detailed terms asserts that both the EWMP and WMP are not acceptable alternatives to the receiving water limitation provision in the current MS4 permit. The only program that should control as a means of meeting RWL requirements is the stormwater management program (SWMP), which is specified in federal regulations and is a standard feature in all MS4 permits issued in California. The WMP/EWMP cannot be alternatives to the SWMP. It must be the SWMP that determines compliance with receiving water limitations, not watershed program plans. However, a watershed manage program, which would specifically address watershed/sub-watershed issues, could be achieved through the SWMP. The iterative process would extend to the WMP/EWMP as being sub-sets of the SWMP. However, with respect to the EWMP, it should be noted that in order to qualify as a compliance determinant, it must comply with California Water Code sections §16101, §16102, and §1610, which are associated with the Watershed Improvement Act of 2009. The EWMP does not conform to this statute.

The City appreciates the opportunity to comment on this very important matter. Should you have any questions please feel free to call me.

Sincerely,

Edward Medrano, Director  
Police, Streets & Development Services