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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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July 23, 2015

IN REPLY PLEASE
REFER TO FILE: **WM-9**

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

Dear Ms. Townsend:

COMMENT LETTER – PROPOSAL TO DEVELOP A STORM WATER PROGRAM WORKPLAN AND IMPLEMENTATION STRATEGY

The County of Los Angeles and the Los Angeles County Flood Control District appreciate the opportunity to provide comments on the Storm Water Strategic Initiative Proposal. Enclosed are our comments for your review and consideration.

If you have any questions, please contact me at (626) 458-4300 or ageorge@dpw.lacounty.gov or your staff may contact Mr. Paul Alva at (626) 458-4325 or palva@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

A handwritten signature in cursive script that reads "Angela R. George".

ANGELA R. GEORGE
Assistant Deputy Director
Watershed Management Division

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Enc.

cc: Chief Executive Office (Rochelle Goff)
County Counsel (Judith Fries)

**STORM WATER STRATEGIC INITIATIVE PROPOSAL TO DEVELOP A STORM
WATER PROGRAM WORKKPLAN AND IMPLEMENTATION STRATEGY
COMMENTS OF THE COUNTY OF LOS ANGELES AND
THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT**

The County of Los Angeles (County) and the Los Angeles County Flood Control District (LACFCD) appreciate the opportunity to provide comments on the Storm Water Strategic Initiative (SWSI) Proposal to Develop a Storm Water Program Workplan and Implementation Strategy. Through the SWSI, the State Water Resources Control Board (State Board) has shown commendable foresight and leadership. The SWSI proposal and the corresponding list of proposed projects are excellent examples of good government planning and public policy, as the State Board is uniquely qualified to develop a statewide approach to storm water management and funding. Further, we appreciate the efforts of State Board staff in conducting an open and transparent planning process with extensive stakeholder outreach and participation. The proposal reflects the collective experience and expertise of staff and a broad range of stakeholders. We look forward to a continued collaborative partnership with the State Board and State Board staff to implement the very important projects contained in the SWSI proposal.

The County and the LACFCD strongly support the four guiding principles presented in the SWSI document:

Guiding Principle 1: The Water Boards' Programs Treat Storm Water as Valuable Water Resource.

Guiding Principle 2: The Water Boards' Storm Water Programs Preserve Watershed Processes to Achieve Desired Water Quality Outcomes

Guiding Principle 3: The Water Boards Implement Efficient and Effective Regulatory Programs.

Guiding Principle 4: The Water Boards Collaborate to Solve Water Quality and Pollutant Problems with an Array of Regulatory and Non-Regulatory Approaches

The current drought has generated regulatory and legislative actions that point to the vital importance of leveraging storm water as a resource. In the Los Angeles region, the adoption of the 2012 Los Angeles MS4 Permit has garnered unprecedented cooperation and action among permittees. The Watershed Management Program (WMP) and Enhanced Watershed Management Program (EWMP) plans prepared by a

majority of permittees, including the County and the LACFCD, provide a blue print (and the estimated costs) for the efforts required to meet the highly ambitious clean water goals in the Los Angeles region and, where feasible, augment local water supply with urban and storm water runoff. These plans together constitute the potential for the largest public works projects undertaken in Los Angeles County in decades. If successfully implemented, the WMPs and EWMPs will direct a multi-year course of projects and actions to treat storm water as a valuable water resource across the region and to reduce reliance on imported water over time. The State Board is the only agency that can prioritize and plan funding directed towards a statewide benefit. EWMPs and WMPs funded and implemented throughout Los Angeles County will directly impact the amount of available fresh water for the most populated County in the state — now and into the future.

As a general comment, the County and the LACFCD strongly support the expedited implementation of certain projects where the stated goals and objectives align with existing stakeholder efforts or objectives. As discussed in Section 8 of the SWSI proposal, limited State Board resources can be enhanced and extended through more stakeholder collaboration and leveraging of resources external to the State Board. In some instances, it may be appropriate for State Board staff to play more of an advisory role (retaining the final decision-making power regarding any recommendations to be brought to the State Board) while stakeholders groups such as the California Stormwater Quality Association take on the lead role to move a project forward.

Below are our specific comments on the proposed projects.

PROJECT 1 - SUPPORT STORM WATER CAPTURE AND USE
PROJECT 2 – STAKEHOLDER COLLABORATION TO PROMOTE STORM WATER AS A RESOURCE
PROJECT 3 – MONETARY VALUE OF STORM WATER

The County and the LACFCD support the timely implementation of these three high priority projects, which collectively represent concrete and necessary steps to advance the capture and use of storm water as a valuable water resource.

The LACFCD is the primary entity for conducting groundwater replenishment operations in Los Angeles County. Through an advanced infrastructure system - including 14 major dams, 26 centralized groundwater recharge facilities, and approximately 480 miles of open flood control channels serving a jurisdiction of 85 cities and approximately 140 unincorporated communities - in an average year the LACFCD is responsible for the capture and recharge of an estimated 200,000 acre-feet of storm water into groundwater basins.

The LACFCD is continuously exploring ways to increase the capture and use of storm water. For example, in late 2012, the LACFCD, in partnership with the U.S. Department of Interior, Bureau of Reclamation, and other stakeholders, embarked on the \$2.4 million Los Angeles Basin Stormwater Conservation Study to assess long-term flood control and water conservation impacts from projected population and climate conditions in the Los Angeles Basin. When it is completed in December 2015, the study will recommend potential changes to the operation of stormwater capture systems, modifications to existing facilities, and development of new facilities that could help meet future flood control and water supply needs.

Also, since 2011, the LACFCD has played a leadership role in the Storm Water Task Force of the Southern California Water Committee, a consortium of local water supply and flood control agencies whose mission is to provide a regional perspective and coordination on strategies and recommendations for utilizing storm water effectively as a local water supply while reducing urban runoff pollution.

Another example of the County's and the LACFCD's leadership in this area is reflected in the development of WMPs and EWMPs throughout the region. The County and LACFCD are committed to continue to provide regional leadership to facilitate the successful implementation of these highly ambitious programs.

Efforts such as these reflect the commitment of the County and the LACFCD to a robust local water supply and less reliance on imported water. We look forward to working with State Board staff and other stakeholders to advance the goal of using storm water as a valuable water resource through the timely implementations of Projects 1 through 3.

PROJECT 4 - SENATE BILL 985 STORM WATER RESOURCES PLAN IMPLEMENTATION

PROJECT 8 - FUNDING FOR STORM WATER PROJECTS

The recently approved Water Bond is a critical source of potential funding for storm water capture and reuse projects. In the context of funding storm water projects, priority should be given to projects that address the current drought and have been designed to meet regulatory water quality mandates.

With respect to the proposed Project 4, as the State Board develops implementation guidelines for SB 985, prioritizing funding for the WMPs and EWMPs in the Los Angeles region would not only help facilitate the transformation of the region's approach to storm water and reduce historical reliance on imported water, but importantly, also help Los Angeles region's permittees to comply with very aggressive regulatory deadlines. The

County and the LACFCD look forward to providing input to the State Board during the development of SB 985 implementation guidelines.

Similarly, the County and the LACFCD recommend a modification to the scope of Project 8 to give priority to projects that have immediate funding needs in order to meet regulatory deadlines.