



CALIFORNIA STATE ASSOCIATION OF COUNTIES
1100 K STREET, SUITE 101
SACRAMENTO, CA 95814



RURAL COUNTY REPRESENTATIVES OF CALIFORNIA
1215 K STREET, SUITE 1650
SACRAMENTO, CA 95814

August 15, 2013

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

Subject: SWRCB/OCC FILE A-2236(a) THROUGH (kk)
COMMENTS IN RESPONSE TO QUESTIONS POSED BY THE STATE WATER RESOURCES CONTROL BOARD CONCERNING RECEIVING WATER LIMITATIONS AS ADDRESSED IN ORDER NO. R4-2012-0175 - WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT, INCLUDING THE COUNTY OF LOS ANGELES, AND THE INCORPORATED CITIES THEREIN, EXCEPT THE CITY OF LONG BEACH

Dear Ms. Wadhvani:

On behalf of the California State Association of Counties (CSAC) and the Rural County Representatives of California (RCRC), we thank you for the opportunity to comment on the on the subject request by the State Water Resources Control Board (State Water Board) in its July 8, 2013 announcement with respect to the petitions received on the MS4 permit for discharges within Los Angeles County Flood Control District, including the County of Los Angeles, and the incorporated cities therein (LA MS4 Permit).

California's 58 counties are proud of what they have accomplished to help reduce run-off through our storm water programs. Counties are committed to helping the state achieve its water quality goals, and we want to continue working with the state to adopt stormwater regulations that balance stormwater quality objectives with the operational and economic realities of stormwater management in the public and private sectors.

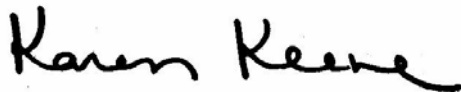
CSAC and RCRC support the Watershed Management Program (WMP) and Enhanced Watershed Management Program (EWMP) compliance alternatives in the LA MS4 Permit. We believe both are carefully drafted and compliance oriented water quality management tools that will ensure improvement of surface water quality while providing the opportunity to increase the local water supply for the region. A similar approach, such as the "strategic compliance program" being proposed by the California Stormwater Quality Association (CASQA) in its comment letter dated August 15, 2013, would also be appropriate in other MS4 permits.

We continue to believe, consistent with comments that we conveyed in our November 13, 2012 letter to the Board, that the WMP and EWMP approach is a legally valid and enforceable way to achieving receiving water limitations. It does not violate the Clean Water Act but instead follows

relevant guidance and precedent while remaining faithful to the mandates and requirements of anti-backsliding, anti-degradation, and total maximum daily loads (TMDL). The approach not only provides a mechanism and certainty by which permittees can meet the water quality objectives of the permit, but also allows permittees to focus on established watershed priorities and ensure consistency with TMDL provisions.

Thank you again for the opportunity to comment. Your positive consideration of our input as well as the comments submitted by CASQA and individual cities and counties is very much appreciated. Please feel free to contact us for more information regarding our comments and concerns.

Sincerely,

A handwritten signature in black ink that reads "Karen Keene". The signature is written in a cursive style with a large, sweeping initial 'K'.

Karen Keene, CSAC
Senior Legislative Representative
916-327-7500, x-511

A handwritten signature in black ink that reads "Staci Heaton". The signature is written in a cursive style with a large, sweeping initial 'S'.

Staci Heaton, RCRC
Regulatory Affairs Advocate
916-447-4806