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March 4, 2014

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

Dear Ms. Townsend:

Re: Comment Letter - April 1st, 2014 Board Meeting:
Final Draft Industrial General Permit

The Los Angeles Department of Water and Power (LADWP) appreciate the opportunity to provide comments on the 2014 Final Draft Industrial General Permit (Draft Permit). LADWP recognizes and appreciates the work of the State Water Resources Control Board (Board) staff in developing this final draft.

LADWP supports the Board's recognition on page 33 of the fact sheet which points out and identifies the benefits of infiltration and reuse of Stormwater by encouraging the use of Low Impact Development (LID) and related green infrastructure techniques. Although a statewide credit system for LID development has yet to be developed, LADWP recognizes the Boards efforts in acknowledging the importance and technology enhancement value of LID Best management Practices, and hopes the Board will continue to development a program to recognize dischargers that utilize LID.

In addition, LADWP supports the Board staff's decision to change the Permit effective date to July 1, 2015. This change will prevent overlap and /or confusion between the monitoring, inspection, and reporting requirements of the existing General Permit.

The revisions made have improved this latest Draft permit from the previous 2013 version. However, LADWP is still concerned about the QISP requirement as detailed below:

1. Section IX. Training Qualifications, Order Sections IX.A. Paragraphs 1-3 page 24-25.

LADWP acknowledges and appreciates the attempt to simplify the Qualified Industrial Storm Water Practitioner (QISP) and delete the various levels so that there will be only

Ms. Jeanine Townsend
March 4, 2014
Page 2

one level of QISP; however, LADWP still believes the new requirements fail to recognize qualified individuals who have the knowledge and expertise to implement the permit, which are not licensed by The California Department of Consumer Affairs Board for Professional Engineers, Land Surveyors and Geologists (CBPELSG).

23.1

LADWP recommends that self-guided State Water Board-sponsored training program be available for all members of the facilities compliance team not just the Professional Engineers who will be the QISP. This training will be useful and would aide the other designated team members assigned to perform activities recommended by the QISP which are required by this General Permit.

In closing, LADWP looks forward to working with the Board staff on the renewal of this permit. Should you have any questions regarding this letter, please contact Ms. Charlynn Rachell of the Wastewater Quality and Compliance Group at (213) 367-2976.

Sincerely,



Katherine Rubin
Manager of Wastewater Quality and Compliance

CR:lr

c: Ms. Charlynn Rachell