

CITY OF INDUSTRY

Incorporated June 18, 1957

California Regional Water Quality Control Board
Los Angeles Region
ATTN: Sam Unger, Executive Director
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

March 15, 2017

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

RE: Endorsement of Design Approach for Biofiltration Equivalency, pursuant to Attachment H of LA County MS4 Permit (Order No. R4-2012-0175) for the project at 12851 Crossroad Parkway South in the City of Industry

Dear Mr. Unger,

The Los Angeles County MS4 Permit (Order No. R4-2012-0175) (MS4 Permit), as amended by Order No. WQ 2015-0075, defines conventional "biofiltration" based on specific design and sizing criteria which are included in Attachment H of the permit. In addition, the MS4 Permit allows the Los Angeles County Regional Water Quality Control Board (Regional Board) Executive Officer to approve alternate biofiltration design criteria.


In the City of Industry, on the 12851 Crossroads Parkway South project, a series of Filterra biofiltration systems, manufactured by Contech Engineered Solutions (Contech), have been proposed as permanent post-construction stormwater management BMP in lieu of the conventional biofiltration design described in Attachment H. Retention and infiltration of the water quality control volume had been determined to be infeasible on this site due to inadequate native soil permeability, and rainwater capture and use was not feasible due to inadequate demand. The Filterra system was proposed due to its relatively small footprint, prefabricated and modular construction and its demonstrated operation and maintenance reliability.

The Filterra system has demonstrated superior concentration reduction performance for conventional stormwater pollutants in numerous independently verified field monitoring studies. However, due to its relatively small footprint, a typically sized Filterra system may not offer the same runoff reduction and pollutant load reduction benefits as conventional biofiltration. Therefore a new sizing approach is needed that compensates for the volume reduction differential by increasing the Filterra system size and/or adding supplemental infiltration capacity. Contech contracted Geosyntec Consultants to develop such a design approach and supporting rationale which is captured in a report attached to this letter entitled, "Filterra Equivalency Analysis and Design Criteria".

The Filterra system proposed on the 12851 Crossroads Parkway South project is sized consistent with the approach detailed in the above referenced report. Therefore we expect it to provide equivalent performance to conventional biofiltration and ask for your endorsement of this design approach. Supporting design calculations are attached.

The City of Industry, Contech and the project developer request your review of the enclosed information and acceptance to use the Filterra biofiltration system for the project at 12851 Crossroads Parkway South.

Sincerely,

A handwritten signature in blue ink, appearing to read "James R. Cramsie".

James R. Cramsie, PE
Stormwater Program Manager
City of Industry

Attachment: Filterra Equivalency Analysis and Design Criteria Report, dated August 2015
Supporting Calculations for 12851 Crossroads Parkway South Project

Cc: JN-9208 Project Folder