



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

JAN 21 2014

Ms. Rebecca Christman
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

re: Proposed Time Schedule Order Requiring the City of Los Angeles to Comply with Requirements Prescribed in Order No. R4-2012-0175 at Inner Cabrillo Beach

Dear Ms. Christman:

The following is in response to the Notice of Proposed Issuance of Time Schedule Order (TSO) for Los Angeles County Municipal Separate Storm Sewer System (LA County MS4) permit. This proposed TSO addresses discharges from the City of LA's MS4 to Inner Cabrillo Beach (ICB) which exceed limits reflecting the Los Angeles Harbor Bacteria Total Maximum Daily Load (TMDL).

Part VI.E.4.d.ii. of the LA County MS4 permit requires that a request for a TSO contain:

“A detailed description and chronology of structural controls and source control efforts, since the effective date of the TMDL, to reduce the pollutant load in the MS4 discharges to the receiving waters subject to the TMDL.”

Based on the documentation provided in the City of Los Angeles' December 24, 2012 request, and included in finding 14 of the proposed TSO, the City of LA has demonstrated that they have been diligent in their efforts to reduce the pollutant loads in their discharges. Despite these efforts, the ICB continues to have bacteria levels above limits established in the LA County MS4 permit.

The TSO incorporates an appropriate schedule of actions to be taken by the City of LA to achieve full compliance with final water quality-based effluent limitations and corresponding final receiving water limitations.

We recommend adoption of the proposed TSO. It is our view that this action is an appropriate means for addressing this non-compliance with the LA County MS4 permit.

We appreciate the opportunity to comment on this TSO. If you have any questions on this matter, please contact Eugene Bromley of the NPDES Permits Office at (415) 972-3510.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Sablad".

Elizabeth Sablad, Acting Manager
NPDES Permits Office (WTR-5)