



CITY OF LONG BEACH

OFFICE OF THE CITY MANAGER

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January 4, 2018

Mr. Mark Pestrella
Los Angeles County, Department of Public Works
900 S. Fremont Ave.
Alhambra, CA 91803

Re: Safe, Clean Water Program – City of Long Beach Comments (SAC Meeting #2)

Dear Mr. Pestrella:

On behalf of the City of Long Beach, I am submitting comments based on 3 items discussed at the Safe, Clean Water Program Stakeholder Advisory Committee (SAC) meeting on December 13, 2017. Long Beach looks forward to working with the County on this important initiative.

Project Eligibility

Regional and municipal project eligibility must be driven by Total Daily Maximum Load (TMDL) and National Pollutant Discharge Elimination System (NPDES) permit compliance. As noted in the Board of Supervisors' motion on May 30, 2017, Los Angeles County and eighty-five of its cities are required to implement programs that include building stormwater capture and clean-up projects as part of Federal Clean Water Act compliance. The State has authority to assess significant financial penalties if these projects are not built; and while some municipalities have adopted fees and taxes to address some of the stormwater funding need, most have no funding source to pay for it.

- **Regional projects (funded from the 50%)** – On December 13, the County put forth for consideration, the requirement for all regional projects to include at a minimum, “water quality” and “water supply” benefits. Long Beach is concerned with this criterion.

The challenge with limiting regional projects to only those that include “water supply”, lies with the traditional definition of the term and requirements associated with it. Limiting regional projects to those that support water supply would preclude many strong regional stormwater re-use projects from eligibility and implementation.

Instead, Long Beach proposes the County define regional project eligibility as multi-benefit and at a minimum, include “water quality”, and “water supply” or “stormwater re-use”. “Stormwater re-use” is a reasonable addition to regional project eligibility, as re-using stormwater for water functions that do not require potable water results in offsets to potable water use in the region; thereby, incidentally supporting water supply.

For further consideration, it may be beneficial to establish a regional distribution methodology to watersheds based on area proportion and include water quality needs as a factor. The County may also consider establishing thresholds for regional projects, i.e.: number of agencies the project will benefit, size of tributary area, amount of water captured/treated, etc.

- **Municipal projects (funded from the 40%)** – Long Beach supports the County’s proposal to require all municipal projects to support a “water quality” benefit. The County may want to define “water quality” benefits as those that support TMDL or NPDES compliance.

Project Eligibility Sub-committee

The idea of forming a sub-committee to further define project eligibility was discussed. The City of Long Beach formally requests membership on this sub-committee.

Project Lists and Alternatives

Long Beach supports the development of a strong and discrete list of specific projects, while leaving the majority of funds available for project types. The reasons for this recommendation are as follows:

- The benefit of providing a discrete list of specific projects is the ability to cite key examples of where, when and how funding will be used to meet stormwater compliance requirements.
- The benefit of making the majority of funding available for project types is the enablement of cities to utilize the best available technology and project configuration to most efficiently and effectively achieve Total Daily Maximum Load (TMDL) and National Pollutant Discharge Elimination System (NPDES) permit compliance.

Thank you for the opportunity to participate in these important discussions. Given Long Beach’s size as the 2nd largest city in Los Angeles County, our varying topography, as well as our geographic location as a coastal city at the end of two major river systems and two watersheds, we know there is much to be achieved in this arena and look forward to working with the County to do so.

Should you have any questions, please contact Diana Tang, Manager of Government Affairs at (562) 570-6506 or diana.tang@longbeach.gov.

Sincerely,



Patrick H. West
CITY MANAGER

cc: Supervisor Janice Hahn, 4th Supervisorial District
Craig Beck, Director of Public Works, City of Long Beach
Christopher J. Garner, General Manager, Long Beach Water Department