



June 15, 2018

Mr. Mark Pestrella, Director  
Los Angeles County Department of Public Works  
900 South Fremont Avenue  
Alhambra, California 91803

Dear Mr. Pestrella:

LA Sanitation (LASAN) and the Los Angeles Department of Water and Power (LADWP) would like to thank you for attending the Los Angeles City Council's Energy, Climate Change, and Environmental Justice Committee meeting on June 5, 2018. Based on the feedback from the Council Committee meeting and after reviewing the latest Safe, Clean Water (SCW) Program elements, the ordinance and the credit program, we would like to bring the following items to your attention and consideration for inclusion in the final SCW Program:

1. The operation and maintenance cost for any completed regional project constructed prior the effective date of the SCW Program that is in compliance with the 2012 MS4 Permit and meets the criteria set forth in the SCW Program should be eligible for funding under the regional program. As we commented in our May 11, 2018 letter, the SCW Program should acknowledge and reward cities that have already invested in the implementation of regional water quality projects such as Machado Lake and Wilmington Drain improvement projects.
2. Projects that are constructed with partial funding from the SCW Program should be fully eligible for funding of all of the project's operation and maintenance costs.
3. The threshold of 50 acres for credit eligibility should be significantly reduced or removed. Cities may be able to assist by processing the credit as part of their development LID review and approval. In addition, the SCW Program should incentivize private projects that exceed the LID requirements onsite or offsite and make them eligible for funding.
4. Include the flexibility and the ability in the proposed ordinance to develop, fund and implement a low income lifeline rate under the District Program.
5. Include the flexibility and the ability in the District Program to fund regional watershed monitoring across watersheds or as part of scientific studies.

6. If improvement projects are constructed as part of the District Program, priority should be given to constructing community benefits in DACs with priority for mitigating flooding and providing flood protection and public safety.
7. Source control, inspection and compliance to identify and eliminate pollution point sources tributary to a Regional Project should be eligible for funding under the Regional Program as part of the operation and maintenance expenses of the Regional Project.

We truly appreciate your consideration of our comments and we look forward to further discussing these comments with you. If you have any questions or comments, please do not hesitate to contact LASAN Assistant Director, Mr. Adel Hagekhalil at (213) 485-2210.

Sincerely,



ENRIQUE C. ZALDIVAR, Director and General Manager  
LA Sanitation and Environment



DAVID H. WRIGHT, General Manager  
Los Angeles Department of Water and Power

ECZ:AHH:SK:vg

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