



# California Regional Water Quality Control Board

## Santa Ana Region



**Linda S. Adams**  
Secretary for  
Environmental Protection

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**Arnold Schwarzenegger**  
Governor

November 17, 2010

Mr. Jason E. Uhley  
Chief of Watershed Protection Division  
Riverside County Flood Control and  
Water Conservation District  
1995 Market Street  
Riverside, CA 92501

### **LOCAL IMPLEMENTATION PLAN TEMPLATE FOR THE COUNTY OF RIVERSIDE AND THE INCORPORATED CITIES OF RIVERSIDE COUNTY, ORDER NO. R8-2010- 0033, NPDES NO. CAS6180033, AREAWIDE URBAN STORM WATER RUNOFF**

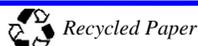
Dear Mr. Uhley,

We have reviewed the Local Implementation Plan Template for the Santa Ana Region dated July 29, 2010, submitted in accordance with Order No. R8-2010-0033. The Local Implementation Plan (LIP) is the principal document that comprehensively translates the MS4 Permit requirements into specific actions for the local municipalities. We recognize that this document is a model template and the specific implementation details will be in the individual LIPs. As such, we have recommended in this model template where the local LIP may have to describe the specific details. Please see our comments in the enclosed marked-up version of the model LIP.

We have the following general comments:

1. The individual LIPs must include jurisdiction-specific standard operating procedures, processes and personnel assignments in a user-friendly format. It may be easier to place some of these in the appendices to facilitate future revisions to procedures or staff assignments.
2. Inter departmental coordination and collaboration are critical within each municipality for efficient implementation of various program elements and for database maintenance. We recommend that a flowchart and a checklist or other similar mechanisms be used to track the progress of each project and to ensure that proper procedures are followed by all departments within the municipality.
3. The Principal Permittee oversees the monitoring program. However, the results from the monitoring program should be a tool that each permittee should utilize to assess its program effectiveness. As such, a brief description/discussion of the various monitoring program elements and their relationships to the Permittee's

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specific programs should be a part of the LIP. If there are specific TMDL or other monitoring programs that would impact the Permittee and its programs that should be included in the LIP. Also, base-line dry weather flow monitoring for TDS/TIN at each core monitoring location may require additional action by the Permittee.

If you have any questions regarding this matter, please contact Mr. Keith Elliott at (951) 782-4925 or Ms. Milasol Gaslan at (951)782-4419.

Sincerely,

Michael J. Adackapara  
Division Chief

Enclosure: Mark-up of the Local Implementation Plan Template.

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