



# California Regional Water Quality Control Board

## Santa Ana Region



Linda S. Adams  
Acting Secretary for  
Environmental Protection

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Edmund G. Brown, Jr.  
Governor

January 11, 2011

Mr. Matt Yeager  
San Bernardino County Stormwater Program  
825 East Third Street  
San Bernardino, CA 92415-0835

**MODEL LOCAL IMPLEMENTATION PLAN (LIP) TEMPLATE FOR THE SAN BERNARDINO COUNTY FLOOD CONTROL DISTRICT AND THE INCORPORATED CITIES OF SAN BERNARDINO COUNTY, ORDER NO. R8-2010-0036, NPDES NO. CAS6180036, AREAWIDE URBAN STORM WATER RUNOFF**

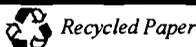
Dear Mr. Yeager,

We have reviewed the Local Implementation Plan Template for the Santa Ana Region dated July 29, 2010, submitted in accordance with Order No. R8-2010-0036. The Local Implementation Plan (LIP) is the principal document that comprehensively translates the MS4 Permit requirements into specific actions for the local municipalities. We have no objections to using this document as a model template and recognize that the specific implementation details will be in the individual LIPs. As such, we have a few recommendations where the individual LIP may have to describe the specific details required in the permit. Please see our comments in the enclosed marked-up version of the model LIP.

We have the following general comments:

1. Overall, this is a good area-wide template for the Local Implementation Plan (LIP) as it describes the content and substance of each section and subsections of Order No. R8-2010-0036. However, the individual LIPs must include jurisdiction-specific standard operating procedures, processes and identify key personnel assignments in a user-friendly format. It may be easier to place some of these in the appendices or attachments 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. We recommend that such a checklist should include the title, name, signature and date of the approving entity or key personnel for each phase or activity being approved.

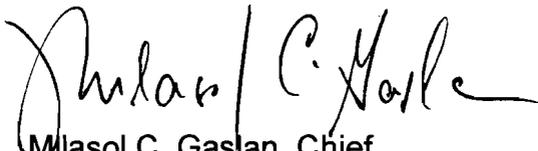
*California Environmental Protection Agency*



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 specific programs should be a part of the individual 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. Section VIII.D (IDDE) requires that the Permittees maintain a database of permitted and unpermitted connections, routine inspections and dry weather monitoring. Each Permittee should describe its IDDE dry weather monitoring including base-line dry weather flow monitoring for TDS/TIN at significant outfall locations (36 inches or larger in diameter) as specified in M&RP Section IV.B.3.

If you have any questions regarding this matter, please contact Ms. Kathleen Fong at (951) 774-0114 or me at (951)782-4419.

Sincerely,

  
Milasol C. Gaslan, Chief  
Inland Storm Water Section

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

Cc: San Bernardino County MS4 Permittees (via e-mail)