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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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June 12, 2006

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QUALITY CONTROL BOARD
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IN REPLY PLEASE
REFER TO FILE: WM-9

Mr. Jonathan Bishop, Executive Director
California Regional Water Quality
Control Board – Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013-2343

Dear Mr. Bishop:

**REPORT OF WASTE DISCHARGE
COUNTY OF LOS ANGELES NATIONAL POLLUTANT DISCHARGE ELIMINATION
SYSTEM MUNICIPAL STORMWATER PERMIT ORDER 01-182
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT CAS004001**

The enclosed Report of Waste Discharge (ROWD) is being submitted as the Los Angeles County Municipal Stormwater application for renewal of waste discharge requirements adopted in Order 01-182 by your Board. This ROWD has been prepared by the Principal Permittee through a stakeholder process. Permittees who are participating in this application renewal are listed in Section 2.0, Table 2.

The County of Los Angeles and the Los Angeles County Flood Control District are signatory to the enclosed ROWD.

If you have any questions, please contact Ms. Carrie Douangsitthi at (626) 458-4346, Monday through Thursday, 7:15 a.m. to 6 p.m.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

MARK PESTRELLA
Assistant Deputy Director
Watershed Management Division

JS:ad
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Enc.

cc: State Water Resources Control Board
United States Environmental Protection Agency, Region 9

bc: Watershed Management (Lafferty, Pereira, Wu)

Date

REPORT OF WASTE DISCHARGE

**Renewal Application for the County of Los Angeles
National Pollutant Discharge Elimination System
Municipal Stormwater Permit
Order 01-182
NPDES Permit CAS004001**

June 12, 2006

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1.0 INTRODUCTION

1.1 PURPOSE

In accordance with the requirements found in Part 6, Section S, of the existing 2001 Los Angeles County National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit (NPDES CAS004001), Order 01-182, this Report of Waste Discharge (ROWD) constitutes the Los Angeles County Municipal Stormwater application for renewal of waste discharge requirements adopted in Order 01-182 by the Regional Water Quality Control Board, Los Angeles Region (Regional Board). Permittees listed in Section 2 (Applicant Information) have elected to participate in this ROWD application. However, not all Permittees under this Order have joined this application renewal. These other Permittees will submit separate ROWDs for coverage under an NPDES Municipal Stormwater Permit.

In addition to the report and recommendations contained herein, Permittees reserve their right to object to those terms of the NPDES Permit or modifications to those terms of the Permit, which are not addressed in this ROWD. This ROWD, and the contents herein, do not constitute a waiver of the Permittees' rights to challenge objectionable terms contained in previous, current, or future Permits, and no contrary inference should be drawn. Permittees further reserve their right to further revise, modify, and/or challenge any item addressed in this ROWD.

The State and Regional Board must make every effort to comply with the California Environmental Quality Act (CEQA) and mitigate any impacts resulting from the implementation of NPDES Permit requirements.

1.2 REGULATORY BACKGROUND

The 1972 Clean Water Act established the NPDES Permit Program to regulate the discharge of pollutants from point sources to waters of the United States. However, pollution from land and urban runoff was largely unabated for over a decade.

In response to the 1987 Amendments to the Federal Clean Water Act (CWA), the United States Environmental Protection Agency (EPA) developed Phase I of the NPDES Stormwater Program in 1990, which established a framework for regulating urban stormwater runoff. The Phase I program addressed sources of stormwater runoff that had the greatest potential to negatively impact water quality. Under Phase I, the EPA required NPDES Permit coverage for stormwater discharges from:

- Medium and large municipal separate storm sewer systems (MS4) with populations of 100,000 or more; and
- Companies that fall within 11 categories of industrial activity, including construction activity that disturbs 5 or more acres of land.

Operators of MS4s regulated under the Phase I NPDES Stormwater Program were required to obtain Permit coverage for stormwater discharges under their control. The most significant portion of application was the development of a proposed stormwater management program that would meet the standard of “reducing pollutants to the maximum extent practicable (MEP).” Stormwater management programs for medium and large MS4s include measures to:

- Identify major outfalls and pollutant loadings;
- Detect and eliminate nonstormwater discharges to the system;
- Reduce pollutants in runoff from industrial, commercial, and residential areas; and
- Reduce pollutants from construction sites within their jurisdiction.

1.3 OBJECTIVES

The objective of the Permittees in submitting this ROWD is to successfully renew a Los Angeles County NPDES Municipal Stormwater Permit that includes requirements to achieve the goal of “reducing pollutants to the MEP” while taking into account:

- Feasibility;
- Financial resources available;
- Cost of implementation;
- Overall benefit to water quality;
- Effectiveness of existing Stormwater Quality Management Program (SQMP);
- Suggested improvements to existing SQMP;
- Suggested approaches to improve receiving water quality;
- Use of best available technologies; and
- Integration of impaired water body specific programs.

1.4 PROGRAM DESCRIPTION

On December 13, 2001, the Regional Board adopted Order 01-182 serving as the NPDES Permit for municipal stormwater and urban runoff discharges within the County of Los Angeles. The requirements of Order 01-182 apply to 84 Cities and the unincorporated areas of Los Angeles County under County jurisdiction, with the exception of Avalon, Long Beach, and the portion of Los Angeles County in the Antelope Valley, which includes the Cities of Lancaster and Palmdale. Under the Permit, the Los Angeles County Flood Control District is designated the Principal Permittee, and the County of Los Angeles along with 84 incorporated Cities are designated Permittees. The Principal Permittee coordinates and facilitates activities necessary to comply with the requirements of the Permit, but is not responsible for ensuring compliance of any of the Permittees.

Through the Permit, the Regional Board implemented a Watershed Management Approach to address water quality protection in the region. The Watershed Management Approach intended to provide a comprehensive and integrated strategy

toward water resource protection, enhancement, and restoration while balancing economic and environmental impacts within a hydrologically defined drainage basin or watershed. The Permit divides Los Angeles County into the following six Watershed Management Areas (WMAs):

- Ballona Creek and Urban Santa Monica Bay WMA
- Dominguez Channel/Los Angeles Harbor WMA
- Los Angeles River WMA
- Malibu Creek and Rural Santa Monica Bay WMA
- San Gabriel River WMA
- Santa Clara River WMA

A list of Permittees, according to Watershed Management Area, is provided in Table 1.

Table 1 – Table of Permittees

Santa Monica Bay	Los Angeles River	San Gabriel River
Malibu Creek and Other Rural	Alhambra	Artesia
Agoura Hills	Arcadia	Baldwin Park
Calabasas	Bell	Bellflower
Los Angeles County Flood Control	Bell Gardens	Bradbury
Los Angeles County	Burbank	Cerritos
Malibu	Commerce	Claremont
Westlake Village	Compton	Covina
	Cudahy	Diamond Bar
Ballona Creek and Other Urban	El Monte	Duarte
Beverly Hills	Glendale	Hawaiian Gardens
Culver City	Hidden Hills	Industry
El Segundo	Huntington Park	La Habra Heights
Hermosa Beach	La Canada Flintridge	La Mirada
Los Angeles (City of)	Los Angeles (City of)	La Puente
Los Angeles County Flood Control	Los Angeles County Flood Control	La Verne
Los Angeles (County of)	Los Angeles (County of)	Lakewood
Manhattan Beach	Lynwood	Los Angeles County Flood Control
Palos Verdes Estates	Maywood	Los Angeles (County of)
Rancho Palos Verdes	Monrovia	Norwalk
Redondo Beach	Montebello	Pomona
Rolling Hills	Monterey Park	Pico Rivera
Rolling Hills Estates	Paramount	San Dimas
Santa Monica	Pasadena	Santa Fe Springs
West Hollywood	Rosemead	Walnut
	San Fernando	West Covina
	San Gabriel	
	San Marino	Santa Clara River
Dominguez Channel	Sierra Madre	Santa Clarita
Carson	South El Monte	Los Angeles County Flood Control
Gardena	South Gate	Los Angeles (County of)
Hawthorne	South Pasadena	
Inglewood	Temple City	

Dominguez Channel (Cont.)	Los Angeles River (Cont.)	
Lawndale	Vernon	
Lomita		
Los Angeles (City of)		
Los Angeles County Flood Control		
Los Angeles (County of)		
Torrance		

Permittees reviewed, discussed, and evaluated several documents and programs to determine the most critical areas to address in this ROWD. Many of the specific proposals presented in this ROWD were derived from dialogue between Permittees.

Initially, the County of Los Angeles hosted four General Assembly meetings. These meetings occurred on October 27, 2005, November 17, 2005, December 15, 2005, and February 8, 2006. All Permittees were invited to participate in an open forum to discuss the direction of the ROWD, share their opinions and concerns for the next Permit and to assess implementation experiences to identify potential improvements to stormwater programs. After several meetings a structure for the preparation of the ROWD was agreed upon. First, Watershed Management Committees would self-elect a watershed representative to participate on a Steering Committee of nine. The Steering Committee included all six watershed representatives, the City of Los Angeles, one at-large Permittee representative, and the County of Los Angeles.

All Permittees were asked to discuss future Permit issues in each of their respective watersheds and to prepare written comments as a watershed. The County compiled the comments into a matrix for discussion by the Steering Committee. The Steering Committee ultimately made decisions on how the comments would be addressed and incorporated into this ROWD.

2.0 APPLICANT INFORMATION

A total of 78 Permittees along with the County of Los Angeles and the Los Angeles County Flood Control District, which are identified in Table 2 below, have elected to participate in this ROWD application. Please note that not all Permittees under Order 01-182 have joined this application renewal. These other Permittees will submit a separate ROWD application for coverage under an NPDES Municipal Stormwater Permit.

Table 2 – Table of Permittees Joining in ROWD Application

Permittee	Contact Person	Title	Address	
Agoura Hills	Ken Berkman	City Engineer	30001 Ladyface Court	Agoura Hills, CA 91301
Alhambra	James Cowan	Water Quality and Environmental Compliance Supervisor	111 South First Street	Alhambra, CA 91801-3796
Arcadia*	Susannah Turney	Environmental Services Officer	P.O. Box 60021	Arcadia, CA 91066-6021
Artesia	Maria Dadian	Director of Public Works	18747 Clarkdale Avenue	Artesia, CA 90701-5899
Baldwin Park	David Lopez	Associate Engineer	14403 East Pacific Avenue	Baldwin Park, CA 91706-4297
Bell	Luis Ramirez	Deputy City Engineer	6330 Pine Avenue	Bell, CA 90201-1291
Bell Gardens	John Oropeza	Director of Public Works	7100 South Garfield Avenue	Bell Gardens, CA 90201-3293
Bellflower*	Bernie Iniguez	Management Analyst	16600 Civic Center Drive	Bellflower, CA 90706-5494
Beverly Hills	Vincent Chee	Project Civil Engineer	455 North Rexford Drive	Beverly Hills, CA 90210
Bradbury	Elroy Kiepke	City Engineer	600 Winston Avenue	Bradbury, CA 91010-1199
Burbank	Bonnie Teaforde	Public Works Director	P.O. Box 6459	Burbank, CA 91510
Calabasas	Alex Farassati	Environmental Services Manager	26135 Mureau Road	Calabasas, CA 91302-3172
Carson*	Patricia Elkins	Building Construction Manager	P.O. Box 6234	Carson, CA 90745
Cerritos*	Mike O'Grady	Environmental Services	P.O. Box 3130	Cerritos, CA 90703-3130

Permittee	Contact Person	Title	Address	
Claremont*	Andrea Harrington	Associate Civil Engineer	207 Harvard Avenue	Claremont, CA 91711-4719
Commerce*	John Yanai	Interim Community Development Director	2535 Commerce Way	Commerce, CA 90040-1487
Compton	Leslie Alan Pyeatt	Assistant City Engineer	205 South Willowbrook Avenue	Compton, CA 90220-3190
Covina	Charles Redden	Environmental Services Manager	125 East College Street	Covina, CA 91723-2199
Cudahy	George Perez	City Manager	P.O. Box 1007	Cudahy, CA 90201-6097
Culver City	Cathy Chang	Associate Engineer/Stormwater Quality Manager	9770 Culver Boulevard	Culver City, CA 90232-0507
Diamond Bar*	David Liu	Director of Public Works	21825 East Copley Drive	Diamond Bar, CA 91765-4177
Duarte	Steve Esbenshades	Engineering Manager	1600 Huntington Drive	Duarte, CA 91010-2592
El Monte	Carmen Barsu	Associate Engineer	P.O. Box 6008	El Monte, CA 91731
El Segundo	Ron Fajardo	Wastewater Supervisor	350 Main Street	El Segundo, CA 90245-3895
Gardena*	Ron Jackson	Building Maintenance Superintendent	P.O. Box 47003	Gardena, CA 90247-3778
Glendale	Maurice Oillataguerre	Senior Environmental Program Specialist	Engineering Section 633 East Broadway, Room 209	Glendale, CA 91206-4308
Hawaiian Gardens*	Joseph Colombo	Director of Community Development	21815 Pioneer Boulevard	Hawaiian Gardens, CA 90716
Hawthorne	Arnold Shadbehr	Chief General Service and Public Works	4455 West 126th Street	Hawthorne, CA 90250-4482
Hermosa Beach	Homayoun Behboodi	Associate Engineer	1315 Valley Drive	Hermosa Beach, CA 90254-3884
Hidden Hills	Cherie Paglia	City Manager	6165 Spring Valley Road	Hidden Hills, CA 91302
Huntington Park	Wes Lind	City Engineer	6550 Miles Avenue	Huntington Park, CA 90255
Industry	Mike Nagaoka	Director of Public Safety	P.O. Box 3366	Industry, CA 91744-3995
Inglewood	Teri Davis	Administrative Analyst	P.O. Box 6500	Inglewood, CA 90301-1750

Permittee	Contact Person	Title	Address	
La Canada Flintridge	Steve Castellanos	Director of Public Works	1327 Foothill Boulevard	La Canada Flintridge, CA 91011-2137
La Habra Heights	Ronald Bates	City Manager	1245 North Hacienda Boulevard	La Habra Heights, CA 90631-2570
La Mirada	Steve Forster	Public Works Director	13700 La Mirada Boulevard	La Mirada, CA 90638-0828
La Puente	Rozanne Adanto	Director of Community Services	15900 East Main Street	La Puente, CA 91744-4788
La Verne	Daniel Keeseey	Director of Public Works	3660 "D" Street	La Verne, CA 91750-3599
Lakewood	Lisa Rapp	Director of Public Works	P.O. Box 158	Lakewood, CA 90714-0158
Lawndale*	Marlene Miyoshi	Senior Administrative Analyst	14717 Burin Avenue	Lawndale, CA 90260
Lomita	Tom A. Odom	City Administrator	P.O. Box 339	Lomita, CA 90717-0098
Los Angeles	Shahram Kharaghani	Program Manager	1149 S. Broadway, 10th Floor	Los Angeles, CA 90015
Lynwood	Paul Nguyen	Interim Director of Environmental Services	11330 Bullis Road	Lynwood, CA 90262-3693
Malibu	Jennifer Voccola	Environmental Program Analyst	23815 Stuart Ranch Road	Malibu, CA 90265-4861
Manhattan Beach	Lindy Coe-Juell	Senior Management Analyst	1400 Highland Avenue	Manhattan Beach, CA 90266-4795
Maywood	Edward Ahrens	City Manager	4319 East Slauson Avenue	Maywood, CA 90270-2897
Monrovia	David Fike	Director of Public Works	415 South Ivy Avenue	Monrovia, CA 91016-2888
	Doug Benash	City Engineer	415 South Ivy Avenue	Monrovia, CA 91016-2888
	Louis Celaya	Senior Management Analyst	415 South Ivy Avenue	Monrovia, CA 91016-2888
Montebello	Tom Melendrez	City Engineer	1600 West Beverly Boulevard	Montebello, CA 90640-3970
Monterey Park	Tina Clark	Principal Management Analyst	320 West Newmark Avenue	Monterey Park, CA 91754-2896
Norwalk	Chino Consunji	City Engineer	P.O. Box 1030	Norwalk, CA 90651-1030
Palos Verdes Estates	Allan Rigg	Director of Public Works	340 Palos Verdes Drive West	Palos Verdes Estates, CA 90274

Permittee	Contact Person	Title	Address	
Paramount	Chris Cash	Utility and Infrastructure Assistant Director	16400 Colorado Avenue	Paramount, CA 90723-5091
Pasadena	Danny Wooten	Project Manager Public Works Engineering - Chamber Building, 4th Floor	P. O. Box 7115	Pasadena, CA 91109-7215
Pico Rivera*	Angel Quintero	Water Quality Specialist	P.O. Box 1016	Pico Rivera, CA 90660-1016
Pomona	Yvette Lama	Environmental Program Coordinator	P.O. Box 660	Pomona, CA 91769-0660
Rancho Palos Verdes	Ray Holland	Interim Public Works Director	30940 Hawthorne Boulevard	Rancho Palos Verdes, CA 90275
Redondo Beach	Mike Shay	Principal Civil Engineer	P.O. Box 270	Redondo Beach, CA 90277-0270
Rolling Hills	Yolanta Schwartz	Planning Director	2 Portuguese Bend Road	Rolling Hills, CA 90274-5199
Rolling Hills Estates	Greg Grammer	Assistant to the City Manager	4045 Palos Verdes Drive North	Rolling Hills Estates, CA 90274
Rosemead*	Ken Rukavina	City Engineer	8838 East Valley Boulevard	Rosemead, CA 91770-1787
San Dimas	Kym O'Leary	Administrative Aide	245 East Bonita Avenue	San Dimas, CA 91773-3002
San Fernando	Ron Ruiz	Director of Public Works	117 Macneil Street	San Fernando, CA 91340
San Gabriel	Bruce Mattern	City Engineer	425 South Mission Drive	San Gabriel, CA 91775
San Marino	John Alderson	Director of Parks and Public Works	2200 Huntington Drive	San Marino, CA 91108-2691
Santa Clarita	Oliver Cramer	Environmental Analyst	23920 West Valencia Boulevard, Suite 300	Santa Clarita, CA 91355
Santa Fe Springs*	Sarina Morales-Choate	Civil Engineer Assistant	P.O. Box 2120	Santa Fe Springs, CA 90670-2120
Santa Monica	Neal Shapiro	Urban Runoff Coordinator	1685 Main Street	Santa Monica, CA 90401-3295
Sierra Madre	Veenita Singh	Management Analyst	232 West Sierra Madre Boulevard	Sierra Madre, CA 91024-2312
South El Monte	George Envall	Traffic Engineer	1415 North Santa Anita Avenue	South El Monte, CA 91733-3389
South Gate	Robert T. Dickey	Director of Public Works	8650 California Avenue	South Gate, CA 90280

Permittee	Contact Person	Title	Address	
South Pasadena*	Edwin Galvez	Director of Public Works	1414 Mission Street	South Pasadena, CA 91030-3298
Temple City	Charles Martin	Interim City Manager	9701 Las Tunas Drive	Temple City, CA 91780-2249
Torrance	Leslie Cortez	Senior Administrative Analyst	3031 Torrance Boulevard	Torrance, CA 90503-5059
Vernon*	Samuel Kevin Wilson	Director Community Services	4305 Santa Fe Avenue	Vernon, CA 90058-1786
Walnut	Jack Yoshino	Senior Management Assistant	P.O. Box 682	Walnut, CA 91788
West Covina*	Samuel Gutierrez	Engineering Technician	P.O. Box 1440	West Covina, CA 91793-1440
West Hollywood	Jan Harmon	Environmental Services Specialist	8300 Santa Monica Boulevard	West Hollywood, CA 90069-4314
Westlake Village	Roxanne Hughes	Stormwater Program Coordinator	31200 Oak Crest Drive	Westlake Village, CA 91361
County of Los Angeles	Carrie Douangsitthi	Senior Civil Engineer	900 South Fremont Avenue	Alhambra, CA 91801
Los Angeles County Flood Control District	Carrie Douangsitthi	Senior Civil Engineer	900 South Fremont Avenue	Alhambra, CA 91801

* The City is to be a Permittee under this joint ROWD, but is not joining in select portions and parts of this ROWD, as described in that letter dated June 8, 2006, sent to the County, and copied to the Regional Board for inclusion in the administrative record.

3.0 PROGRAM ACCOMPLISHMENTS

The 2001 Los Angeles County NPDES Municipal Stormwater Permit set requirements for Discharge Prohibitions, Receiving Water Limitations, Storm Water Quality Management Program Implementation, Special Provisions, Definitions, and Standard Provisions. Some requirements have been in place for several Permit cycles, some have evolved as a result of Permittee implementation and experiences, and others were imposed on the Permittees by the Regional Board. All prohibitions and limitations have been observed and followed to the maximum extent practicable to ensure Permit compliance.

Permittees have implemented programs that meet and often exceed the basic provisions of the existing 2001 NPDES Permit, but also recognize that continued progress requires program approaches that are strategic, measurable, beneficial, cost-effective, and adaptive.

The City of Los Angeles believes major success was achieved in November 2004 when City of Los Angeles voters approved Proposition O, the City's \$500 million general obligation bond measure to clean up stormwater and urban runoff. Known as the "Clean Water, Ocean, River, Beach, Bay Storm Water Cleanup Measure," Proposition O passed with nearly 76 percent of City residents voting "yes." The City of Los Angeles believes passage of Proposition O improves the City's ability to comply with near-term State and Federal water quality mandates. The bond monies can be applied only toward capital improvement projects and the City of Los Angeles contends that funding for any associated operation and maintenance activities must still be secured.

3.1 STORMWATER QUALITY MANAGEMENT PROGRAM

As a general requirement, all Permittees implemented the SQMP and its components to reduce the discharge of pollutants in stormwater to the MEP. Where necessary, Permittees implemented additional controls to reduce the discharge of pollutants to and from the MS4. Permittees made a good faith effort to require and implement the most effective combination of BMPs for stormwater/urban runoff pollution control.

The Principal Permittee coordinated and facilitated activities to comply with the requirements of the 2001 NPDES Permit. The Los Angeles County Department of Public Works (Public Works) coordinated Permit activities among Permittees and the Principal Permittee acted as a liaison between Permittees and the Regional Board.

For coordination purposes, Permittees previously established an ad hoc Countywide committee known as the Executive Advisory Committee (EAC), and for each of the WMAs, a Watershed Management Committee (WMC) has been formed. The EAC's role is to help facilitate programs throughout the region and to enhance consistency among all of the programs. The WMCs provide the leadership framework to facilitate development of the Watershed Management Area Plans and to foster Permittee

cooperation. The six WMCs are required to meet quarterly; however, some WMCs have decided to meet monthly.

The Principal Permittee implemented the Countywide Monitoring Program and evaluated, assessed, and synthesized the results of the monitoring program. Annual Monitoring Reports were submitted by August 15 of each year and the 1994-2005 Integrated Receiving Water Impacts Report was submitted on August 15, 2005. In addition, the Principal Permittee coordinated the collection, processing, and submittal of annual reports to the Regional Board. Permittees prepared an annual budget summary of expenditures applied to the stormwater management program.

Permittees obtained and possessed the necessary legal authority to prohibit non-stormwater discharges to the storm drain system. Ordinances were adopted to prohibit the discharge of runoff to the MS4 from: wash water from the cleaning of gas stations, auto repair garages, or other types of automotive services facilities; mobile auto washing, steam cleaning, mobile carpet cleaning, and other such mobile commercial and industrial operations; areas where repair of machinery and equipment, that are visibly leaking oil, fluid or antifreeze, is undertaken; storage areas of materials containing grease, oil, or other hazardous substances, and uncovered receptacles containing hazardous materials; chlorinated/brominated swimming pool water and filter backwash; the washing of toxic materials from paved or unpaved areas; washing impervious surfaces in industrial/commercial areas; and concrete or cement laden wash water from concrete trucks, pumps, tools, and equipment.

3.2 PUBLIC INFORMATION AND PARTICIPATION

The Principal Permittee developed and implemented a Public Information and Participation Program (PIPP) that met the following objectives:

- Measurably increase the knowledge of the target audience regarding the MS4, the impacts of stormwater pollution on receiving waters, and potential solutions to mitigate the problems caused;
- Measurably change the waste disposal and runoff pollution generating behavior of target audiences by encouraging implementation of appropriate solutions; and
- Involve and engage socio-economic groups and ethnic communities in Los Angeles County to participate in mitigating the impacts of stormwater pollution.

The public education campaign was designed to meet the objectives of the 2001 NPDES Permit. Modifications have been made based on research results and current social marketing theory to achieve the desired behavior change. Permittees worked hard to comply with the requirements of the PIPP under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by Permittees.

3.3 INDUSTRIAL/COMMERCIAL FACILITIES CONTROL

Pursuant to the Permit, Permittees required the implementation of pollutant reduction and control measures at industrial and commercial facilities, with the intent of reducing pollutants in stormwater runoff to the MEP. The pollutant reduction and control measures used include source control BMPs, and operational and maintenance procedures. The objective of the Industrial/Commercial Facilities Control Program was to track, inspect, and ensure compliance at industrial and commercial facilities that were identified as critical sources of pollutants in stormwater.

Any inspection obligations in exceedance of Federal regulations constitute a State mandate and should be funded by the Regional Board in accordance with the precepts set forth in Article XIII, Section 6, of the California Constitution. The Regional Board shall consider the economic impacts of mandating Permit requirements that exceed Federal regulations. The Federal regulations only require Permittees to have a program to monitor and control pollutants in stormwater discharges from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and industrial facilities that the municipalities determine are contributing a substantial pollutant loading to the MS4. Permittees reserve their right to object to any further requirement, and the discussion reporting on activities taken pursuant to the Permit and recommendations for improvements, if inspections are included in the next Permit, should not be construed as a waiver of this objection.

Permittees developed and maintained databases for facilities within their own jurisdictions that were identified as critical sources of stormwater pollution in the 2001 NPDES Permit. The critical sources tracked are summarized below:

- Restaurants;
- Automotive service facilities;
- Retail gasoline outlets (RGOs) and automotive dealerships;
- U.S. EPA Phase I facilities (Tiers 1 and 2);
- Other federally-mandated facilities [as specified in 40 CFR 122.26(d)(2)(iv)(C)];
- Municipal landfills;
- Hazardous waste treatment, disposal, and recovery facilities; and
- Facilities subject to Superfund Amendments and Reauthorization Act (SARA) Title III (also known as Emergency Planning and Community Right-To-Know Act EPCRA).

Each Permittee collected information and updated on a regular basis an inventory of critical sources. Permittees collected the following information for each industrial and commercial facility:

- Name of facility and name of owner/operator;
- Address;
- Coverage under the General Industrial Activity Storm Water Permit (GIASP) or other individual or general NPDES permits; and
- A narrative description, including Standard Industry Classification (SIC) codes, that best reflects the industrial activities and principal products at each facility.

The first round of inspections under the 2001 NPDES Permit, for the critical source facilities identified above, were completed by August 1, 2004. Inspections are currently underway for the second round, which are expected to be completed in fall 2006. The critical source facilities received educational materials on stormwater pollution prevention practices and were inspected to ensure that the facility:

- Does not pour oil and grease or oil and grease residue onto a parking lot, street, or adjacent catch basin;
- Keeps trash bin areas clean and trash bin lids closed, and does not fill trash bins with washout water or any other liquid;
- Does not allow illicit discharges, such as the discharge of wash water from floor mats, floors, porches, parking lots, alleys, sidewalks, and street areas (in the immediate vicinity of the establishment), filters or garbage/trash containers;
- Removes food waste, rubbish, or other materials from parking lot areas in a sanitary manner that does not create a nuisance or discharge to the storm drain;
- Maintains the facility area so that it is clean and dry and without evidence of excessive staining;
- Implements housekeeping BMPs to prevent spills and leaks;
- Properly discharges wastewaters to a sanitary sewer and/or contains wastewaters for transfer to a legal point of disposal;
- Is aware of the prohibition on discharge of nonstormwater to the storm drain;
- Properly manages raw and waste materials, including proper disposal of hazardous waste;

- Protects outdoor work and storage areas to prevent contact of pollutants with rainfall and runoff;
- Labels, inspects, and routinely cleans storm drain inlets that are located on the facility's property;
- Routinely sweeps fuel-dispensing areas for removal of litter and debris, and keeps rags and absorbents ready for use in case of leaks and spills;
- Is aware that wash down of facility area to the storm drain is prohibited;
- Is aware of design flaws (such as poor grading that does not prevent run-on, or inadequate roof covers and berms), and that appropriate BMPs are implemented;
- Inspects and cleans storm drain inlets and catch basins within each facility's boundaries no later than October 1 of each year;
- Posts signs close to fuel dispensers, which warn vehicle owners/operators against "topping off" of vehicle fuel tanks and the use of automatic shut-off dispenser nozzles;
- Routinely checks outdoor waste receptacle and air/water supply areas, cleans leaks and drips, and ensures that only watertight waste receptacles are used and that lids are closed;
- Trains employees to properly manage hazardous materials and wastes as well as to implement other stormwater pollution prevention practices; and
- Has, if needed, a current Waste Discharge Identification (WDID) number for facilities discharging stormwater associated with industrial activity, and that a Storm Water Pollution Prevention Plan is available on-site, and is effectively implementing BMPs in compliance with Los Angeles County Code, Regional Board Resolution 98-08, and the SQMP.

While Permittees were not required to inspect facilities under the 2001 NPDES Permit that had been inspected by the Regional Board within 24 months, the Principal Permittee found it difficult to schedule inspections in advance without timely and detailed information posted on the Regional Board's website on facilities they have or are scheduled to inspect. The information provided on the website was not specific enough to the Municipal Permittees, and specifically for the unincorporated areas of the County of Los Angeles. The Regional Board's spreadsheet of industrial facilities inspected (see link: http://www.waterboards.ca.gov/rwqcb4/html/programs/stormwater/sw_industrial_inspect_ions.html) does not provide detailed enough jurisdictional information with respect to the unincorporated areas of Los Angeles County. Mailing address city names are provided, though these city names are not necessarily the same as the actual jurisdiction.

Permittees evaluated compliance of industrial/commercial facilities that were identified as critical sources under the 2001 NPDES Permit. Various industrial/commercial facilities inspections resulted in additional BMPs being required. Most of the BMPs required were to address issues involving operations that were exposed to stormwater, washing operations, and trash/litter management.

Permittees participated in various task forces, including the Los Angeles County District Attorney Strike Force, the City of Los Angeles Strike Force, and the Federal Los Angeles Environmental Group Strike Force, and worked closely with the Regional Board and other Permittees to resolve stormwater-related violations and other issues.

Permittees have found that the program has been effective in educating and bringing awareness to restaurant and other business operators on stormwater pollution prevention measures. The success of this program resulted in increasing efforts made by business owners to reduce pollutants in stormwater in order to comply with regulations.

Public Works, Environmental Programs Division, was the lead agency to implement pollutant reduction and control measures through inspections of industrial and commercial facilities within the unincorporated areas of Los Angeles County. 3,743 critical source facilities in the unincorporated areas were inspected in the first round. Approximately 15 percent of all sites inspected resulted in BMPs being required to address stormwater-related pollution. Less than 1 percent of all facilities were referred to the Regional Board for violations.

As part of other mandates on the County of Los Angeles, inspections of critical source facilities with underground storage tanks (in the unincorporated areas and 74 Permittee Cities) and/or with industrial waste permits (in the unincorporated areas and in 38 Permittee Cities) were conducted on a regular basis, to enforce stormwater regulations and requirements of the Industrial/Commercial Facilities Control Program during each inspection.

The Industrial/Commercial Facilities Control Program was designed to meet the objectives of the 2001 NPDES Permit. Permittees worked hard to comply with the requirements of the Industrial/Commercial Facilities Control Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by Permittees.

3.4 DEVELOPMENT PLANNING

Permittees implemented a Development Planning Program that attempted to minimize impacts from stormwater and urban runoff on the biological integrity of Natural Drainage Systems and water bodies in accordance with requirements under CEQA.

Public works, in consultation with Permittees, funded the *Peak Discharge Impact Study*, which was coordinated by the Southern California Stormwater Monitoring Coalition and project managed by the Southern California Coastal Waters Research Project. Interim Peak Flow Criteria were adopted by Public Works on January 31, 2005. The technical report is available on the internet at ftp://ftp.sccwrp.org/pub/download/pdfs/450_peak_flow.pdf.

In general, Permittees developed and made SUSMP guidelines available to developers. Applicable projects have been conditioned to meet the SUSMP requirements prior to a Building or Grading Permit being issued.

Public Works developed a technical manual for siting and design of BMPs for the development community. The various types of structural BMPs Permittees have required developers to incorporate into their projects include catch basin inserts, hydrodynamic devices, vortex separators, biofilters, on-site clarifiers, vegetative swales, perforated pipes in rock filled trenches, and detention basins.

Most private consulting engineers, contractors, and developers doing business with the Public Works are aware of the requirements of the Development Planning Program. Further, vendors of proprietary BMPs as well as advocates of nonproprietary practices are routinely invited to make presentations to the Public Works staff, a practice that keeps staff up-to-date on current stormwater treatment methods and helps them make informed decisions about applicability and effectiveness. The Principal Permittee has gone above and beyond the requirements of the Permit by establishing a BMP Task Force and developing the BMPLA.org website, which includes a Yellow Pages for BMP manufacturers, distributors, product descriptions, and services.

The Development Planning Program was designed to meet the objectives of the NPDES Permit. Permittees worked hard to comply with the requirements of the Development Planning Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by Permittees.

3.5 DEVELOPMENT CONSTRUCTION

Any inspection obligations in exceedance of Federal regulations constitute a State mandate and should be funded by the Regional Board in accordance with the precepts set forth in Article XIII, Section 6, of the California Constitution. The Regional Board shall consider the economic impacts of mandating Permit requirements that exceed Federal regulations. The Federal regulations do not require Permittees to inspect the broad scope of construction sites required by the 2001 NPDES Permit. Permittees continue to reserve their objection to any inspection program that goes beyond that required by the Federal regulations.

Pursuant to the 2001 NPDES Permit, Permittees implemented a Development Construction Program to control runoff from construction activity at all construction sites within its jurisdictions. Construction projects were adequately reviewed for compliance

with the NPDES Permit, which included the development of SWPPP and compliance with the SUSMP. As necessary, enforcement actions were taken against construction sites in violation of Permit requirements. Increased requirement awareness has led to the success of this program.

Leading the effort to better implement this program, the Principal Permittee has placed materials clarifying the requirements of the Development Construction Program on its website and developed a brochure on Water Quality Regulations, which is provided to the public with building permits issued by the Building and Safety Division.

The Development Construction Program was designed to meet the objectives of the 2001 NPDES Permit. Permittees worked hard to comply with the requirements of the Development Construction Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by Permittees.

3.6 PUBLIC AGENCY ACTIVITIES

The Public Agency Activities Program under the 2001 NPDES Permit has been fully implemented by the Permittees. An inspection program for public facilities is in place to ensure field yards are implementing recommended BMPs. The most noted success of the Public Agency Activities Program is greater awareness among the County and cities' staff members of stormwater issues. The Permittees in cooperation with the County Sanitation Districts of Los Angeles completed the Treatment Feasibility Study. This study investigated the possible diversion of dry-weather discharges or the use of alternative treatment control BMPs to treat flows that may impact public health and safety and/or the environment. Other program successes include increased cleanout of problem catch basins and street sweeping, proper coverage of trash receptacles and storage bins for potential pollutants, proper implementation of BMPs on public construction sites, installation of pervious pavement in city parking lots and drainage swales to increase filtration, and equipped facilities with clarifiers for vehicle washing.

Notable improvements as a result of the Public Agency Activities Program are:

- Increased staff awareness;
- Decreased potential for pollutant runoff from public facilities; and
- Upgraded fuel systems at maintenance yards with features that meet and exceed the requirements of the Permit. Some features include: utilizing aboveground storage tanks, secondary containment berms, canopies that extend over the concrete fuel pad, and fuel pads graded to prevent sheet flow.

The Public Agency Activities Program was designed to meet the objectives of the 2001 NPDES Permit. Permittees worked hard to comply with the requirements of the Public Agency Activities Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by Permittees.

3.7 ILLICIT CONNECTIONS/ILLICIT DISCHARGES ELIMINATION

Permittees have increased public awareness of the impacts of illicit connections and illicit discharges. The Public Hotline (1-888-CLEAN-LA) continues to effectively manage the receiving, tracking, and reporting of public complaints. For some Permittees, Closed Circuit TV monitoring has been employed to screen for illicit connection, and for others field screenings have been conducted.

Noteworthy improvements to the Illicit Connections/Illicit Discharges Program include:

- Improved interagency coordination;
- Prompt response to reported illicit discharges;
- Increased public and city staff awareness; and
- Increased public reporting.

The Illicit Connections/Illicit Discharges Elimination Program was designed to meet the objectives of the 2001 NPDES Permit. Permittees worked hard to comply with the requirements of the Illicit Connections/Illicit Discharges Elimination Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by Permittees.

4.0 PRIORITIES FOR PROGRAM IMPROVEMENT

Municipal stormwater and urban runoff management programs in the Los Angeles region were initiated with the June 18, 1990, adoption of Order 90-079. A revised Municipal NPDES Permit was issued in July 1996, and another in December 2001 (Order 01-182). Permittees currently find themselves near the end of this third Permit cycle and have conducted in-depth reviews of their current management programs with an eye toward continued improvement. Program improvement and effectiveness is a priority for Permittees for many reasons. Permittees have an obligation to responsibly manage public funds as well as to protect the quality of the environmental resources within their jurisdictions. In addition, Permittees in the Los Angeles region recognize that effectively managing the impacts of stormwater and urban runoff in a cost-effective manner is in the best interest of all County residents.

This section discusses issues and concepts identified by Permittees as key factors in improving their management programs during the upcoming Permit cycle. These issues and recommendations have a general applicability across multiple program elements. The Permittees have implemented programs that meet and often exceed the basic provisions of the existing Permit, but also recognize that continued progress requires program approaches that are strategic, beneficial, measurable, cost-effective, adaptive, and fiscally responsible.

As will be further elaborated in the remainder of this ROWD, the Permittees have made important strides toward the incorporation of these management principles into their programs, and are committed to increasing their emphasis in the next Permit cycle. Based on their experience developing and implementing programs, the Permittees have determined that key aspects of existing programs can be significantly enhanced. These proposed enhancements to the existing programs will allow for improved implementation and cost-effective operations, thus allowing for reallocation of money and resources to other problem areas without sacrificing water quality protection or other public services. The key challenge in approaching this objective under a re-issued Permit is to provide sufficient opportunity for learning and adapting while ensuring that key Permit programs remain beneficial, compliant, reasonable, cost-effective, and enforceable. To a large extent, doing so depends on how compliance is gauged and the process that is utilized to oversee and evaluate Permit programs.

With this in mind, the remainder of this section provides a more in-depth discussion of specific priorities for the continued improvement of Permittees programs, and the types of changes that the Permittees have determined are necessary to achieve them. In many cases, it should be noted that specific improvements are achievable by Permittees within the current Permit framework. In some instances, however, desired changes will also require Regional Board action that may include specific Permit amendments. On this note upon an issuance of a renewed Permit, the revised SQMP will be developed and submitted to the Regional Board.

4.1 PROGRAM COMPONENTS

Recommended improvements for the next Permit cycle include streamlining specific requirements, providing Permittees with a safe harbor provision, maintaining steady implementation of programs that have been proven to work well, and making results-based modifications to other programs to better utilize limited resources. Components in each of the programs have been identified as requiring some modification to improve the overall intent of the Permit, which is to develop; achieve; and implement a timely, comprehensive, cost-effective stormwater pollution control program to reduce the discharge of pollutants in stormwater to the MEP.

4.2 PRIORITY 1 – RECOMMENDED LANGUAGE FOR RECEIVING WATER LIMITATIONS INCLUDING FINDINGS OF FACT, SAFE HARBOR PROVISION, AND DEFINITIONS

The Permittees recommend that the Permit contain Receiving Water Limitations language, which is consistent with applicable law and with which the Permittees can comply. Order 96-054, the 1996 NPDES Permit, included language that stated “Timely and complete implementation by a Permittee of the stormwater management programs prescribed in this Order shall satisfy the requirements of this section and constitute compliance with receiving water limitations.” It further provided that where an exceedance of a water quality objective had occurred, that the Permittees were to submit stormwater programs that “will increase the likelihood of preventing future exceedances of water quality objectives.” This language was subsequently omitted by the Regional Board in Order 01-182. It is imperative that Permittees have the support of the Regional Board when making a good faith effort to comply with Permit requirements. Permittees must first be given an opportunity to work with the Regional Board to fine-tune programs that are not successful at meeting Receiving Water Limitations. Exposing Permittees to immediate third party lawsuits is unproductive, discourages collaborative working relationships with nongovernmental organizations, and does not achieve the primary goal of improving water quality.

Permittees recommend the following language be used for the Receiving Water Limitations Section:

Findings of Fact:

1. *Urban runoff includes discharges from residential, industrial, commercial, and construction areas within the Permit area. In addition to Urban runoff, the MS4s regulated by this Order receive flows from agricultural activities, open space, State and Federal properties and other land uses not under the control of the Permittees.*
2. *The Permittees lack legal jurisdiction over stormwater discharges into their respective MS4s from agricultural activities, California and Federal properties*

and facilities, school districts, colleges and universities, utilities and special districts, wastewater management agencies and other point and nonpoint source discharges otherwise permitted by or under the jurisdiction of the Regional Board. The Regional Board recognizes that the Permittees should not be held responsible for such facilities and/or discharges. Similarly, certain activities that generate pollutants present in urban runoff are beyond the control or the authority of the Permittees to eliminate. Examples of these include, but are not limited to, the operation of internal combustion engines, atmospheric deposition, brake pad wear, tire wear, residues from application of pesticides, nutrient runoff from agricultural activities, and background conditions (e.g., wildlife and leaching of naturally occurring minerals, metals, and other elements from local geology).

3. The Regional Board finds that the unique aspects of the regulation of urban runoff discharges through MS4s, including, but not limited to, the intermittent nature of discharges, difficulties in monitoring, and limited physical control over the discharges will require adequate time to implement and evaluate the effectiveness of BMPs. Therefore, this Order includes a procedure for determining whether urban runoff discharges are causing or contributing to exceedances of water quality standards and for evaluating whether the SQMP must be revised in order to comply with water quality standards. This Order establishes an iterative process to achieve compliance with water quality standards.

Receiving Water Limitations:

1. The Permittees shall implement BMPs to the MEP to attempt to reduce or eliminate the possibility that urban runoff discharges from the Permittees' MS4s will cause or contribute to an exceedance of water quality standards.
2. The Permittees shall comply with Paragraph 1 through the use of reasonable and cost-effective BMPs to the MEP and other actions to reduce pollutants and the discharges in accordance with the SQMP. It is expected that compliance will occur through an iterative process and the application of increasingly more effective BMPs.
3. If exceedances of water quality standards persist, notwithstanding implementation of SQMP and its components and other requirements of this Permit, the Permittees shall comply with the following procedure:
 - a. Upon a determination by the Permittee that discharges are causing or contributing to an exceedance of an applicable water quality standard, the Permittee shall notify and thereafter submit a written report to the Executive Officer that describes the BMPs that are currently being implemented and the additional BMPs that will be implemented to prevent or reduce those pollutants that are believed to be causing or contributing to the exceedance of the water quality standard. This written report may

be incorporated in the annual stormwater report unless the Executive Officer directs an earlier submittal. If the exceedance of the water quality standard is due to or believed to be due to discharges to the MS4 that are outside the Permittees jurisdiction or control, the Permittees shall advise the Executive Officer in this report.

- b. Upon receipt of the written report, the Executive Officer may request additional BMPs to be implemented.*
- c. Within 90 days after the Executive Officer's approval of additional or modified BMPs, the Permittees shall revise the SQMP to reflect those BMPs.*
- d. If the Permittees have complied with the procedure set forth above and are implementing the revised SQMP, the Permittees do not have to repeat the same procedure for continuing or recurring exceedances of the same water quality standards unless the Executive Officer determines it is necessary to develop additional BMPs and provides written notice to the Permittees of this determination.*
- e. Compliance with the procedures set forth in this section shall satisfy the requirements of this Order and constitute compliance therewith.*

Definitions:

- 1. Maximum Extent Practicable or MEP is the standard established by Congress in Clean Water Act Section 402(p)(3)(B)(iii) that municipal dischargers of stormwater MS4s must meet. For the purpose of this Order, MEP is generally, but not necessarily, less stringent than best available control technology, the standard which industrial dischargers of stormwater must meet. MEP generally emphasizes pollution prevention and source control and includes consideration of technical feasibility, practicability, cost-effectiveness, benefit derived, regulatory compliance, and public acceptance. Where cumulative cost exceeds cumulative benefit, a program or BMP is not considered practicable.*
- 2. Urban runoff is that water discharged to the MS4 for which the Permittees are responsible when further discharged from the MS4 to receiving waters. Urban runoff includes discharges from residential, industrial, commercial, and construction areas within the Permit area. Urban runoff excludes flows from agricultural activities, open space, State and Federal properties, NPDES-permitted discharges, and urban and nonurban land uses that are not under the regulation of the Permittees.*

4.3 PRIORITY 2 – FUNCTION OF WATERSHED MANAGEMENT COMMITTEES

Order 01-182 requires WMCs to carry out specific responsibilities as a group. These responsibilities include:

- a. Facilitate cooperation and exchange of information among Permittees;
- b. Establish goals and objectives and associated deadlines for the WMA as the program implementation progresses;
- c. Prioritize pollution control efforts based on beneficial use impairment(s), watershed characteristics, and analysis of results from studies and the monitoring program;
- d. Develop and/or update and monitor the adequate implementation, on an annual basis, of the tasks identified for the WMA;
- e. Assess the effectiveness of, prepare revisions for, and recommend appropriate changes to the SQMP and its components;
- f. Continue to prioritize the industrial/commercial critical sources for investigation, outreach, and follow-up; and
- g. Meet four times per year and as necessary.

Permittee resources are severely limited. Requiring Permittees to perform additional tasks under the WMCs is extremely difficult because it takes valuable resources away from working on other Permit requirements that have a more significant impact on water quality. These WMC responsibilities are redundant with Permittee obligations under the different programs and it is recommended that they be removed in the next Permit.

Permittees agree that it is important for key personnel within a WMA to meet on a quarterly basis to facilitate cooperation when implementing stormwater programs and to exchange experiences and information that may be of value. However, Permittees recommend having the flexibility to independently determine how to implement Permit programs in the manner that best suits them, whether that be individually or as a WMA. Permittees recommend that the WMC meeting structure be combined with the impaired water body jurisdictional groups to form one joint meeting since many of the same Permittee representatives are handling both obligations. This recommendation would reduce the need for parallel meetings that are unnecessary. WMAs are redundant since Permittees will be forced into watershed-based relationships as a result of impaired water bodies. In addition, quarterly public education meetings address WMC responsibilities a., b., and g.

4.4 PRIORITY 3 – INDUSTRIAL AND COMMERCIAL FACILITIES CONTROL PROGRAM IMPROVEMENTS

Pursuant to the 2001 NPDES Permit, Permittees were required to track, inspect, and ensure compliance at industrial and commercial facilities that were identified as critical sources of pollutants in stormwater. Industrial and commercial facility inspections help to directly identify businesses that contribute pollutants to the MS4. Commercial

facilities such as restaurants, automotive service facilities, retail gasoline outlets, and automotive dealerships, were required to be inspected twice during the 5-year term of the 2001 NPDES Permit. Facilities in Tier 1 and Tier 2 Categories were required to be inspected at the same frequency. However, for Tier 2 facilities, Permittees may reduce the frequency of additional compliance inspections to once every 5 years provided that they inspect at least 20 percent of the facilities in Tier 2 each year.

To provide for an effective inspection program, Permittees found it unnecessary and a waste of resources to repeatedly inspect facilities that are found to be in compliance with the General Industrial Activities Stormwater Permit (GIASP). A much more effective inspection strategy would be to repeatedly target industrial/commercial facilities that are not in compliance.

Any inspection obligations in exceedance of Federal regulations constitute a State mandate and should be funded by the Regional Board in accordance with the precepts set forth in Article XIII, Section 6, of the California Constitution. The Regional Board shall consider the economic impacts of mandating Permit requirements that exceed Federal regulations. The Federal regulations only require Permittees to have a program to monitor and control pollutants in stormwater discharges from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and industrial facilities that the municipalities determine are contributing a substantial pollutant loading to the MS4. Permittees reserve their right to object to any further requirement, and the discussion reporting on activities taken pursuant to the Permit and recommendations for improvements, if inspections are included in the next Permit, should not be construed as a waiver of this objection.

Permittees recommend that all Critical Sources such as commercial facilities (restaurants, automotive service facilities, retail gasoline outlets and automotive dealerships) and Phase I facilities (both Tier 1 and 2) be inspected once within the first two years of the new Permit cycle. Facilities determined to be in compliance will not be inspected for the remaining duration of the Permit cycle. However, all facilities determined to have failed to adequately implement the necessary BMPs shall have a follow-up inspection within 4 weeks from the date of the initial inspection. Permittees shall make subsequent inspections and take the necessary enforcement actions to get the facility into compliance. For facilities in violation of the GIASP, Permittees may escalate referral of such violations to the Regional Board after one inspection and one written notice to the operator regarding the violation. After the facility is brought into compliance, Permittees will be required to conduct another inspection of the problem facility during the remaining duration of the Permit cycle. Permittees propose no net decrease in the total number of inspections from the current Permit.

Permittees recommend that annual GIASP inspection fees collected by the State Water Resources Control Board be distributed to Permittees for conducting industrial facility inspections. Financial constraints make it difficult for Permittees to carry out the level of inspections required by the Regional Board. Providing Permittees with sufficient

monetary resources will facilitate full implementation of this program. It is recommended that the Regional Board give Permittees the discretionary ability to eliminate industrial and commercial facility inspections for businesses that are continually found to be in compliance with GIASP requirements and/or exhibit no activities in exposure to stormwater.

It is recommended that Permittees be given the option to identify and describe industrial and commercial facilities by the Standard Industrial Classification (SIC) Code or the North American Industrial Classification System (NAICS). Some Permittees do not use SIC Codes to characterize businesses in their jurisdiction and therefore would prefer to use the NAICS as a substitute.

Permittees recommend removing the requirement to inspect laundries (SIC 72) from the Tier 2 Categories listed in Attachment B – Critical Sources Categories under Order 01-182. Permittees have found that inspecting laundries and dry cleaners do not result in an improvement to water quality since they do not contribute to water quality problems as documented in past inspections.

4.5 PRIORITY 4 – PEAK-FLOW CONTROL AND STANDARD URBAN STORMWATER MITIGATION PLAN (SUSMP)

The Regional Board should further consider the impacts that the Development Planning Program provisions will have on the development of low-income/affordable housing as required under Water Code, Sections 13241(e) and 13263. Permittees propose the following Development Planning Program modifications:

Peak Flow and Hydromodification

The Permittees shall participate in ongoing studies organized by the Southern California Stormwater Monitoring Coalition (SMC) to establish development standards and guidelines to prevent accelerated stream erosion or sediment deposition and to protect stream habitat in Natural Drainage Systems. Included in the studies shall be the review of current peak-flow standards, hydromodification standards from other semi-arid regions, journal articles and other relevant sources related to hydromodification, and channel erosion.

Development standards and guidelines will address post-development peak stormwater discharge rates, velocities, and duration (peak-flow control), and changes to sediment production in Natural Drainage Systems.

The standards will be used to ensure that post-development Natural Drainage Systems mimic predevelopment systems.

Natural Drainage Systems are primarily located in areas tributary to the following streams:

- Malibu Creek;
- Topanga Canyon Creek;
- Upper Los Angeles River;
- Upper San Gabriel River;
- Santa Clara River; and
- Los Angeles County Coastal Streams (Los Angeles Basin Plan Table 2-1).

The standards and guidelines shall be in place by December 10, 2010, or 6 months after publication of the SMC research, whichever is later. During this period, the interim peak-flow standards will continue to be used to regulate hydromodification.

A Permittee or group of Permittees may substitute for the Countywide peak-flow control criteria with a Hydromodification Control Plan (HCP), on approval by the Regional Board, in the following circumstances:

1. Stream or watershed-specific conditions indicate the need for a different peak-flow control criteria, and the alternative numerical criteria is developed through the application of hydrologic modeling and supporting field observations; or
2. A watershed-wide plan has been developed for implementation of control measures to reduce erosion and stabilize drainage systems on a watershed basis.

Developer Technical Guidance and Information

Modify Item B to read:

Six months following the adoption of the stormwater permit, the Permittees will create, publish, and distribute a BMP technical guidance document for the development community in Los Angeles County that will include:

- Sizing criteria;
- Sample/standardized designs;
- Maintenance consideration and recommended procedures;
- Pollutant removal performance; and
- Cost consideration.

The document will be submitted to the Regional Board for review; however, if within 3 months of submittal no approval or rejection is received, the document will be adopted for use by Public Works.

4.6 PRIORITY 5 – SPECIFIC BMP REQUIREMENTS

Under Order 01-182, all Permittees were required to place and maintain trash receptacles at all transit stops within their jurisdiction. Prescriptive requirements, such as this, limit the ability of Permittees to analyze and determine the cost-effectiveness and appropriateness of BMPs to address pollutants of concern. Although the Permit has a provision for BMP substitution, Permittees have expressed concern that this provision is unclear and requires a rather lengthy process to successfully achieve approval for the use of an alternative BMP.

It is recommended that Permittees be given the flexibility to select suitable BMPs and their respective locations, to address pollutants of concern. Permittees also recommend that the explicit requirement to place and maintain trash receptacles at all transit stops be removed from the Permit.

4.7 PRIORITY 6 – STORM WATER POLLUTION PREVENTION PLANS (SWPPP) REDUNDANCY

The General Construction Activities Stormwater Permit (GCASP), Order 99-08-DWQ, requires all dischargers, where construction activities disturb one or more acres, to develop and implement a SWPPP, eliminate or reduce nonstormwater discharges to storm drain systems and other waters of the nation, and perform inspections of all BMPs. Requiring a Local SWPPP to substitute for a State SWPPP is redundant. Permittees recommend eliminating the requirement for a local SWPPP and using the State SWPPP requirement under the GCASP.

4.8 PRIORITY 7 – ILLICIT CONNECTION/ILLICIT DISCHARGE ELIMINATION PROGRAM IMPROVEMENTS

Permittees are required to eliminate all illicit connections and illicit discharges to the storm drain system and to document, track, and report all occurrences. The Permit requires the field screening of open channels, underground pipes, and underground pipes with a diameter of 36 inches or greater by specific dates. Based on an annual evaluation of patterns and trends of illicit connections and illicit discharges, it can be concluded that the following land use types contributed an average of 62.2 percent of all illicit connections and 81.5 percent of all illicit discharges discovered:

- High Density Single-Family Residential
- Retail and Commercial
- Light Industrial
- Multiple-Family Residential
- Transportation

Permittees recommend that field screening be concentrated in the five land use types above to maximize resources and target the areas where most illicit connections and

illicit discharges are currently found. It is recommended that field screening in other land use types be optional since Permittee resources are limited.

Permittees recommend that the term “illicit disposal” be removed from the definitions section of the Permit since it serves no purpose and is not used in the Permit. Other definitions need to be more explicitly defined to establish consistent implementation and reporting by Permittees. The definition for “illicit discharge” should be revised to read, “means any discharge to a constructed storm drain system, excluding streets and gutters, that is prohibited under local, state, ...” This revised definition will clearly identify an illicit discharge as a nonstormwater discharge that has entered a constructed storm drain system. Permittees do not consider a spill or discharge that is only in the gutter or roadway as being an illicit discharge since these types of incidents are typically handled immediately and never reach the receiving waters. Similarly, the definition for “illicit connection” should be revised to read, “means any unpermitted connection to a constructed storm drain system, excluding streets and gutters,...”

4.9 PRIORITY 8 – PERMIT FORMAT

Permittees find the format of the 2001 NPDES Permit difficult to follow. Permittees recommend that the Regional Board also include tables and matrices to assist Permittees with Permit requirements, expectations, and submittal deadlines. Permittees recommend that the Permit include watershed-specific sections to address impaired water bodies.

4.10 PRIORITY 9 – PERMIT IMPLEMENTATION COSTS

Many Permittees have had to budget and divert earmarked money from other municipal requirements to meet the obligations of the 2001 NPDES Permit. Permittees are concerned about the year-to-year increase in program implementation costs and do not foresee new revenue streams to help bridge the gap between Permit compliance and other municipal programs. The Regional Board should not overlook the lack of adequate resources to implement the requirements of the Permit. Consideration should be given to developing and implementing program requirements that target the largest and most frequent sources of stormwater pollution, and that utilize Permittee resources prudently so as not to exhaust them beyond reasonable means. Some Permittees have cited examples such as excessive industrial and commercial facility inspections as having detracted resources from their illicit connection and illicit discharge field-screening program. In addition, Permittees recommend that annual GIASP inspection fees collected by the State Water Resources Control Board be distributed to Permittees for conducting industrial facility inspections.

4.11 PRIORITY 10 – DISCHARGE EXEMPTION REFERENCE

The discharge exemption for potable drinking water supply and distribution system releases makes reference to American Water Works Association (AWWA) guidelines for dechlorination and suspended solids reduction practices. Permittees have determined

that these AWWA guidelines do not exist. Therefore, it is recommended that the AWWA reference be removed from the Permit.

4.12 PRIORITY 11 – LEGAL AUTHORITY

The task of amending or adopting a Permittee-specific stormwater and urban runoff ordinance to enforce all requirements of the Permit takes a significant amount of time to complete. It is recommended that the Regional Board provide Permittees a minimum of 12 months from the date of Permit adoption to complete all necessary changes to possess adequate legal authority to comply with the Permit.

4.13 PRIORITY 12 – ANNUAL REPORT ENHANCEMENTS

Permittees recommend streamlining the Municipal Stormwater Permit Annual Report to only require the reporting of significant records that demonstrate BMP effectiveness and compliance with the implementation of SQMP components to reduce the discharges of pollutants in stormwater to the MEP. Redundant requirements such as the preparation of an assessment of the effectiveness of SQMP requirements to reduce stormwater pollution, which evaluates watershed-wide assessments conducted by each WMC, is unnecessary and a waste of resources. A Principal Permittee assessment of the Permittee assessments is excessive and redundant and does not provide any new information that could not be concluded from reviewing watershed-wide assessments. It is recommended that only one assessment per watershed be required.

Many Permittees have had difficulties in submitting Annual Reports by the October 15 deadline. Problems exist with the short timeframe that Permittees are given between the end of the fiscal year (typically June 30) and the deadline for submitting Annual Reports to the Principal Permittee so that data can be compiled and summarized by the Principal Permittee for submittal by October 15. This limited time period is not sufficient for Permittees to coordinate with internal divisions or departments to gather all the final information needed to compile their Individual Annual Report. In addition, adequate time is not given for financial numbers to be finalized. This preliminary information and data may affect the accuracy of Permittee reporting. Permittees recommend changing the Annual Report deadline from October 15 to November 15 of each year.

Permittees consider some information required for the Annual Report to be irrelevant to achieving the goals of the Permit. It is recommended that the following Annual Report questions be eliminated:

- Section IV.C.7 – How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- Section IV.C.8 – What is the percentage of total development projects that were conditioned to meet SUSMP requirements?
- Section IV.D.5 – How many building/grading permits were issued to sites requiring Local SWPPPs last year?

- Section IV.D.6 – How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Stormwater Permit last year?
- Section IV.D.7 – How many building/grading permits were issued to construction sites less than one acre in size last year?

The following Annual Report tables should be modified to eliminate confusion and improve the quality of data submitted:

- Section IV.F.10 – Delete and replace with the following illicit connections table:

Number of Suspected Illicit Connections Reported	Number of Suspected Illicit Connections Investigated	Number of Illicit Connections Terminated	Number of Suspected Illicit Connections found not to be Illicit	Number of Suspected Illicit Connections that resulted in Enforcement Action

- Section IV.F.13 – Delete and replace with the following illicit discharges table:

Number of Suspected Illicit Discharges Reported	Number of Suspected Illicit Discharges Investigated	Number of Illicit Discharges Terminated	Number of Suspected Illicit Discharges found not to be Illicit	Number of Suspected Illicit Discharges that resulted in Enforcement Action

4.14 PRIORITY 13 – PUBLIC INFORMATION AND PARTICIAPATION ENHANCEMENT

Permittees recommend that the next Permit remove the requirement to ensure a minimum of 35 million impressions per year on the general public about stormwater quality via print, local TV access, local radio, or other appropriate media. We believe a better process to quantify the effectiveness of a public information and participation program is to use a presumptive measurement approach. This presumptive measurement approach will quantify a percent reduction or improvement in water quality as a result of implementing an integrated and cost-effective public information and participation program.

4.15 IMPLEMENTATION APPROACHES

In the past, Permittees have worked diligently to develop comprehensive watershed programs. Permittees have made significant progress on SQMP implementation, but there is room for improvement, with many challenges remaining ahead. Working across watershed boundaries will require that Permittees continue to develop relationships and trust as well as standardized procedures to facilitate increased collaboration. This will increase the effectiveness of watershed programs being implemented. Permittees and the Regional Board must also increase their understanding of the scientific basis of water quality and pollution source control. Allowing for increased flexibility in the next Permit is crucial to future successes. Adopting prescriptive and inflexible Permit requirements would be premature and seriously undermine processes and commitments that have already been put into place. The Regional Board should not adopt new requirements until sufficient data has been collected so as to ensure success to a reasonable level of probability. The scientific data underlying all Regional Board decisions should be subject to peer review consistent with State and Federal law.

Permittees will work together to develop and revise Model Program elements to assist with Permit compliance. Implementation approaches will be evaluated and amended to reflect Permit requirements and achieve the goal of implementing program components to reduce the discharges of pollutants in stormwater runoff to the MEP. Program elements shall be revised to comply with regional, watershed specific requirements, and address pollutants of concern for impaired water bodies.

4.16 TMDL IMPLEMENTATION PLANS

The CWA of 1972 require States to develop a list of impaired waters and the pollutants causing them to be impaired, also known as the 303(d) List. States then establish a pollutant specific TMDL for each listed water body for the particular pollutant causing the impairment. TMDLs are guides to be used in bringing impaired water bodies into compliance with water quality standards necessary to sustain their designated beneficial uses. One of the objectives of this NPDES Permit is to protect the beneficial uses of receiving waters in Los Angeles County by requiring Permittees to reduce the discharge of pollutants in stormwater to the MEP. TMDL Implementation Plans will assist responsible agencies to bring impaired water bodies into compliance with water quality standards.

The projected or anticipated means to comply with waste load allocations established by a valid TMDL are often identified in an implementation plan, which include a number of iterative, adaptive, and integrated approaches that when combined should bring impaired water bodies into compliance with water quality standards. Permittees recommend a Memorandum of Understanding (MOU) between the Regional Board and responsible agencies be adopted in lieu of including TMDLs in the NPDES Permit. TMDLs applicable to responsible agencies should be implemented through the adoption of separate MOUs setting forth reasonable and cost-effective BMPs to be implemented by the Permittees. Such MOUs should provide that good faith compliance and

implementation of the BMPs set forth in the developed implementation plan should constitute compliance with the adopted TMDLs. The use of MOUs is authorized by the Water Quality Control Policy for Addressing Impaired Waters: Regulatory Structure and Options, adopted by State Board Resolution 2005-0050 (June 16, 2005). The effluent limitations in the Permit itself should be expressed as BMPs. See EPA Memorandum, Establishing TMDL Waste Load Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs (November 22, 2002), p.4.

The responsible agencies for the Santa Monica Bay Beaches Bacteria TMDLs will implement and evaluate an array of BMPs developed based on an iterative, adaptive watershed management approach. The responsible agencies will use their respective TMDL implementation plan in an effort to comply with water quality standards. Table 3 below identifies each of the responsible agencies for the different jurisdictional areas in the Santa Monica Bay.

Table 3 – Santa Monica Bay Beaches Bacteria TMDL

Jurisdictions	Responsible Agencies	Implementation Plan
1 and 4	County of Los Angeles City of Malibu California Department of Transportation (Caltrans)	Santa Monica Bay Beaches Bacteria TMDL Implementation Plan for Jurisdictions 1 and 4
2 and 3	County of Los Angeles Caltrans City of El Segundo City of Los Angeles City of Santa Monica	Santa Monica Bay Beaches Bacteria TMDL Implementation Plan for Jurisdictions 2 and 3
5 and 6	County of Los Angeles Caltrans City of El Segundo City of Hermosa Beach City of Manhattan Beach City of Redondo Beach City of Torrance	Santa Monica Bay Beaches Bacteria TMDL Implementation Plan for Jurisdictions 5 and 6
7	County of Los Angeles City of Los Angeles City of Palos Verdes Estates City of Rancho Palos Verdes City of Rolling Hills City of Rolling Hills Estates	Santa Monica Bay Beaches Bacteria TMDL Implementation Plan for Jurisdiction 7

The responsible agencies for the Marina del Rey Harbor Mothers’ Beach Back Basin Dry- and Wet-Weather Bacteria TMDL are the County of Los Angeles, Caltrans, and the Cities of Los Angeles and Culver City. These responsible agencies will use the

Marina del Rey Harbor Mothers' Beach Back Basin Dry- and Wet-Weather Bacteria TMDL Implementation Plan in an effort to comply with water quality standards.

The responsible agencies for the Ballona Creek Trash TMDL are the County of Los Angeles, and the Cities of Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, and West Hollywood. These responsible agencies will use an iterative adaptive BMP implementation strategy in an effort to comply with water quality standards.

5.0 WATER QUALITY MONITORING

The 2001 Permit states that the results of the monitoring program should be used to “refine the SQMP for the reduction of pollutant loadings and the protection and enhancement of the beneficial uses of the receiving waters in Los Angeles County.” Techniques to quantify the relationship between SQMP implementation and water quality are still in their infancy, and will mature through an iterative process over many Permit cycles. The recommendations described in this ROWD have been made with this in mind. Resources are proposed to be shifted toward those studies and monitoring programs that allow for a better measure of SQMP effectiveness and lead to reduction in pollutant loading from urban and storm runoff. Table 1 compares key monitoring requirements under the 2001 Permit with Permittees’ recommendations in this ROWD.

In preparing this ROWD, Permittees have also taken into account the five core management questions set forth in the Stormwater Monitoring Coalition’s report entitled “Model Monitoring Program for Municipal Separate Storm Sewer Systems in Southern California”:

- Question 1: Are conditions in receiving waters protective, or likely to be protective or beneficial uses?
- Question 2: What is the extent and magnitude of the current or potential receiving water problems?
- Question 3: What is the relative urban runoff contribution to the receiving water problems?
- Question 4: What are the sources to urban runoff that contribute to receiving water problems?
- Question 5: Are conditions in receiving waters getting better or worse?

Table 2 shows if and to what extent each of these questions is addressed by both the 2001 Permit and the Permittees’ recommendations. Finally, Table 3 contains a list of impaired water body special studies and monitoring programs for which the Permittees are responsible. Striving to obtain a streamlined and cost-effective monitoring program under the new Permit, Permittees recommend that these studies and programs be integrated with other monitoring requirements as much as possible.

5.1 CORE MONITORING

A. Mass Emissions Monitoring

Mass Emissions Monitoring is conducted in order to approximate the pollutant loads discharged by the MS4 system, to assess temporal trends at the Mass Emissions sites and to determine if flows from the MS4 system contribute to exceedances of water quality standards.

1. Existing Permit Requirements:
 - Monitor 7 Mass Emissions sites during the first storm, 2 additional storms and during 2 dry-weather flows (3 storm flows and 2 dry weather flows).

- Monitor 6 Mass Emissions sites (automated sites only) for total suspended solids (TSS) during all storms with at least 0.25" of rain. Collected data to be used in conjunction with TSS correlation attempts.
- Samples at Mass Emissions sites may be taken with automatic samplers as under Order 96-054. Grab samples must be taken for pathogen indicators and oil and grease. Automated samplers should be set to monitor storms of at least 0.25".
- Samples at the Santa Clara River Mass Emissions site are taken manually due to the infeasibility of installing automated samplers. Flow weighted composites are to be collected during the first 3 hours of a storm, or for the duration if less than 3 hours. A minimum of 3 aliquots separated by a minimum of 15 minutes is collected within each hour of discharge.
- Annually an analysis of the correlation of TSS and other pollutants of concern is performed and reported.

2. Issues and Recommendations

- Wet-weather data has been collected at most Mass Emissions Sites for approximately 10 years. Several constituents that consistently exceed water quality objectives exhibit no statistically significant trend as discussed in the Los Angeles County 1994-2005 Integrated Receiving Water Impacts Final Report, and it is unlikely that these constituents will be reduced to below water quality objectives in a short-time frame. Using existing data, several data modeling exercises were performed to simulate different sampling strategies for wet-weather data. It was concluded that collecting samples 2 times a year, or 3 times on alternate years, would be sufficient to determine trends over an approximately 40-year time period with a confidence of 95 percent. These modeling efforts and a more detailed discussion can be found in the Los Angeles County 1994-2005 Integrated Receiving Water Impacts Final Report. The Permittees recommend monitoring 2 storms and 2 dry-weather events per year.
- Data collected during the period between 1994 and 2005 was analyzed for TSS correlation with other pollutants of concern and the results were reported in the Los Angeles County 1994-2005 Integrated Receiving Water Impacts Final Report. Statistically significant TSS correlations were found only in the Santa Clara Watershed, a natural bottom river, for total chromium, lead, iron, and arsenic as well as for dissolved copper and boron. No TSS correlations were found to be significant in the other watersheds.
- Permittees recommend that the sampling of storms exclusively for TSS be discontinued since few significant correlations were found in the previous 10 years. TSS correlation was intended as a monitoring shortcut whereby TSS measurements could be used to approximate other pollutant loads while avoiding more expensive analyses. However, since few significant TSS correlations were found in the Santa Clara Watershed, and none in the other watersheds, TSS correlation cannot serve its intended purpose as a surrogate for more expensive analysis and should be discontinued.

B. Water Column Toxicity Monitoring

Water Column Toxicity Monitoring is performed in order to evaluate the toxicity of water being discharged from the MS4 system at the Mass Emissions Sites, to determine the causes and extent of toxicity in receiving waters and to modify and utilize the SQMP in order to eliminate or reduce sources of toxicity in MS4 discharges.

1. Existing Permit Requirements
 - Two storm events (including the first of the season) and two dry-weather events are annually analyzed for toxicity. *Ceriodaphnia dubia* (water flea) 7-day survival/reproduction and *Strongylocentrotus purpuratus* (purple sea urchin) fertilization tests are used as a minimum.
 - A Phase I Toxicity Identification Evaluation (TIE) is performed on samples exhibiting a toxicity of 1 Toxic Unit or more for the water flea and a toxicity of 2 Toxic Unit or more for the purple sea urchin.
 - A Toxicity Reduction Evaluation is performed if a pollutant or class of pollutants is responsible for 50 percent of 3 or more TIEs at the same location.

2. Issues and Recommendations
 - Only 9.6 percent of all toxicity tests for *C. dubia* (water flea) resulted in TIEs and no trends were apparent. Furthermore, no dry-weather toxicity tests for *C. dubia* (water flea) were toxic. Therefore, the Permittees recommend reducing the dry weather *C. dubia* (water flea) toxicity testing at the Mass Emissions sites to 1 test per year unless the first dry-weather event *C. dubia* test of each year exhibits toxicity, in which case the second dry-weather event should also be tested for *C. dubia* (water flea) toxicity.
 - Toxicity Testing should be performed at Tributary Monitoring sites for 2 storms and 2 dry events in order to detect pollutant effects that are not detected by physical or chemical analysis. The toxicity tests should be identical to those for the Mass Emissions Sites.

C. Shoreline Monitoring

The Shoreline Monitoring Program is intended to evaluate the impacts to coastal receiving waters and the loss of recreational beneficial uses resulting from storm water/urban runoff.

1. Existing Permit Requirements
 - The City of Los Angeles is responsible for Shoreline Monitoring under the 2001 Permit and the revised Santa Monica Bay Shoreline Monitoring Requirements approved June 14, 2005.
 - Twenty shoreline water quality stations are monitored.
 - Three additional sites are to be evaluated for future monitoring.

- Three indicator groups (Total coliforms, Fecal Coliforms, and Enterococcus) are monitored using membrane filtration, multiple tube fermentation, or chromogenic substrate test kits.
- Sampling occurs weekly or 5 days a week depending upon historical water quality at the sampling sites.
- Sampling occurs during daylight hours and may be omitted during hazardous weather.
- Monitoring frequencies may be modified based on adjacent beach use and storm drain proximity as recommended by the Santa Monica Bay Restoration Commission's Technical Advisory Committee (SMBRC TAC) and the Los Angeles County Department of Health Services (LA County DHS).
- Data is transmitted daily to the LA County DHS.
- LA County DHS is responsible for taking appropriate action in accordance with State law when exceedances of bacterial water quality standards occur.

2. Issues and Recommendations

The Regional Board's 2005 revision to the shoreline-monitoring requirement only partially aligned the Permit's requirement with the Coordinated Shoreline Monitoring Program (CSMP) approved by the Regional Board on April 28, 2004. Some of the Permittees' concerns on this matter were presented in comment letters submitted to the Regional Board by the City of Redondo Beach and Los Angeles County Department of Public Works on April 27 and May 10, 2005, respectively.

The allowable number of exceedance days depends on monitoring frequency. In choosing to conduct weekly monitoring, responsible agencies agreed to a proportional reduction in the allowable number of exceedances from that for daily monitoring. While the rationale behind the SMBRC TAC's recommendation to base monitoring frequency on usage and historical water quality is understandable, Permittees believe that weekly monitoring, which is consistent with AB411, provides reasonable public health protection. Instead of more monitoring, scarce public funds should be directed toward identifying and eliminating anthropogenic sources contributing to shoreline water quality impairments.

Permittees recommend that the CSMP in its entirety replace the existing shoreline monitoring program under the 2001 Permit. Monitoring should be the joint responsibility of those Permittees, which are responsible agencies to address impaired water bodies. Permittees welcome the opportunity to discuss this issue with the SMBRC TAC.

D. Tributary Monitoring

Tributary monitoring is performed in order to identify subwatersheds where stormwater discharges are causing or contributing to exceedances of Water Quality

Standards, and to prioritize drainage and subdrainage areas that need management actions.

1. Existing Permit Requirements
 - A minimum of six tributaries per year is monitored for a minimum of 1 year each. If no exceedances of water quality objectives are found at a station within one year, the station may be moved upon approval of the Regional Board's Executive Officer. If exceedances for the same constituent are found in 3 out of 4 sampled events in a year, the Permittees shall initiate a focused effort to identify the sources of pollutants within that subwatershed.
 - Monitoring started in the Los Angeles River Watershed and is rotated between watersheds subject to the approval of the Regional Board's Executive Officer. Descriptions and explanation of proposed sites and a summary of the previous year's data are to be included in the Annual Monitoring Report. The first tributaries to be monitored were prescribed in Order 01-182.
 - Tributary sites are monitored for the first storm of the year and 3 additional storms. At least 1 dry-weather event per year is monitored at each site. (4 storm events and 1 dry-weather event)
 - Tributary sites are monitored using the same sampling protocol as Mass Emissions sites and samples are analyzed for: pH, dissolved oxygen, temperature, conductivity, TSS, indicator bacteria, all priority pollutants, all constituents for which the water body is impaired downstream, and all constituents that caused toxicity or exceeded water quality criteria at the associated Mass Emissions Site the previous year. Flow data is also collected.
2. Issues and Recommendations
 - Tributary Monitoring sites should be located within a watershed for a period of 2 years. Watersheds should be rotated until all watersheds within the permit area have been monitored before returning to a previously monitored watershed. Watersheds are monitored for 2 years for 2 distinct reasons. First, 2 years allows for better calibration of monitoring equipment and adjusting sampling protocols to site specific factors (traffic patterns, equipment quirks, flow calibration). Secondly, and more importantly, 2 years of monitoring provides time so that subwatersheds with consistently high levels of pollutant loading can be identified, sources within subwatersheds can be identified and the identified sources of pollutants can be properly addressed or eliminated.
 - Tributary monitoring sites will be located in the San Gabriel River Watershed, including the Coyote Creek Watershed, for the 2006-07 monitoring year. Monitoring should continue in this watershed for a total of 2 years, and monitoring in the next watershed should begin during the 2008-09 monitoring year. The Los Angeles River Watershed and Ballona Creek Watershed have each been previously monitored under the

Tributary Monitoring Program. The Santa Clara River, Malibu Creek, and Dominguez Channel Watersheds should be monitored in the future.

- Dry-weather flows occur for a larger portion of the year than storm flows and may be monitored at a much lower expense than storm flows. Dry-weather flows may also provide insight into chronic conditions within the MS4 system that may be masked by the high volumes in a storm flow. Three wet-weather sampling events are sufficient to detect and double check exceedances, in keeping with the purpose of tributary monitoring. Therefore, the Permittees recommend reducing wet-weather sampling to 3 events and increasing the dry-weather sampling to 2 events. Resources saved by reducing wet-weather monitoring will be used to analyze tributary flows for toxicity.
- The Permittees propose the addition of toxicity testing to the Tributary Monitoring Program so as to identify toxic pollutant classes that are not otherwise found using standard physical and chemical tests. The toxicity tests should be identical to those for the Mass Emissions Sites.

5.2 REGIONAL MONITORING

A. Estuary Sampling

The objective of the estuary-sampling requirement is to “sample estuaries for sediment chemistry, sediment toxicity, and benthic macroinvertebrate community to determine the spatial extent of sediment fate from storm water, and the magnitude of its effect.” This objective is consistent with questions 1, 2, and 5 of the Model Monitoring Program.

1. Existing Permit Requirements
The 2001 Permit requires the Principal Permittee to participate in the Bight '03 project, specifically with respect to the project's estuary sampling component. The Permit language provides great detail on the extent of the participation; this has been summarized in Table 1.
2. Issues and Recommendation
Based on a preliminary review of available results, it appears that the Bight '03 project has been conducted such that the 2001 Permit's requirement has been fulfilled. We now better understand the extent and magnitude of impairments in Los Angeles County's estuaries. While some characterization work will remain necessary, we believe it is time to look more systematically at 1) determining the sources of urban runoff that contribute to elevated sediment toxicity levels and 2) how to reduce that contribution. The former question corresponds to question 4 in the MMP; the latter, while not a question formulated in the MMP, is essential for improving estuary sediment quality.

The Permittees recommend continuing participation in and fund future bight-wide studies (e.g., Bight '08). However, Permittees' contribution

should be directed toward follow-up studies designed to answer questions most pertinent to reducing toxicant loading into Los Angeles County's estuaries from urban and storm runoff. These questions will be formulated in the coming months in consultation with Regional Board and SCCWRP, and may include, but are not limited to, the following:

- What are the specific toxicants causing recurring sediment toxicity in Ballona Creek Estuary? Dominguez Channel Estuary?
- What are sources of urban runoff that contribute to sediment toxicity?
- Partitioning coefficients between water column and sediment?
- Suspended sediment toxicity sampling protocol?
- Sediment transport mechanism and deposition patterns?
- What is the state of current technology available to reduce toxicant loading from urban and storm runoff?

B. Bioassessment

Existing Permit Requirements

- Participate in the SMC and with the Surface Water Ambient Monitoring Program (SWAMP) in development of a regional Index of Biological Integrity (IBI).
- Perform bioassessment monitoring every October.
- Monitor a minimum of 20 sampling sites and coordinate with SWAMP in site selection.
- Collect a minimum of 3 replicate samples at each site.
- Submit annual monitoring report containing all physical, chemical, and biological data collected and analyzed during bioassessment

1. Issues and Recommendations

- Regional IBI: Permittees will continue participation in the development and testing of a regional IBI for low graded and ephemeral streams and estuaries.
- Site Selection: Permittees will select the number and location of sampling sites through the protocol expected to be developed in the regional IBI. Permittees will consider those sites already sampled in the 3 years of the current Permit for the sake of continuity.
- Indicator Species: Permittees will choose fresh and salt-water benthic species to indicate the health of low graded and ephemeral streams and estuaries from the regional IBI to be developed.

- Impaired Water Body Studies: Permittees will give consideration to how the bioassessment monitoring required by the MS4 Permit can enhance impaired water body studies.

5.3 SPECIAL STUDIES

A. New Development Impact Study

1. Existing Permit Requirements
 - With support from the City of Santa Clarita, determine impacts from new development in the Santa Clara River Watershed.
 - Compare water quality between 2 subwatersheds, 1 with and 1 without postconstruction SUSMP BMPs.
 - As agreed, if in the event of not finding suitable subwatersheds for study, develop a water quality model to simulate results for a single watershed in the Santa Clara River Watershed.
2. Issues and Recommendations
 - A watershed of multiple-land uses has been selected for the water quality model simulation and monitoring instrumentation is being installed.
 - The model will evaluate the effectiveness of SUSMP implementation by calculating the changes of runoff flows and contaminant loading due to certain BMPs installed. As a result, a matrix of most suitable BMPs for certain types of land use will be recommended.
 - Upon the sampling of at least 3 storms, the model will be calibrated and run for various scenarios of BMP types and placement.
 - Results will be used to support a study proposed by the SMC to evaluate the effectiveness of postconstruction Low Impact Development (LID) BMPs in new development.
 - Permittees will participate with the SMC LID study.

The proposed changes in the study requirements are summarized in Table 1 as compared with the requirements under the existing Permit. The SMC's management questions for the New Development Impact Study are addressed in Table 2.

3. Integration of impaired water body specific programs
 - Results of the SMC LID BMP study will be evaluated for their possible inclusion in impaired water body specific programs. The results of the

study will provide a variety of options of structural BMPs to help implement impaired water body specific programs. Furthermore, the results of the study will help with impaired water body specific programs by minimizing the impact of any future development or redevelopment within the watershed.

4. Comparison of existing and proposed programs in addressing management questions by SMC.

B. Peak Discharge Impact Study

1. Existing permit requirements
 - Evaluate peak-flow controls
 - Determine numeric criteria to prevent or minimize erosion of natural stream channels and banks caused by upstream development.
2. Issues and Recommendations
 - A study, conducted jointly with the SMC, was funded in whole by Public Works and managed by the Southern California Coastal Waters Research Project.
 - The study was completed in a manner sufficient only to develop interim standards, which were promulgated and submitted to the Regional Board on January 31, 2005.
 - Interest in hydromodification issues among the Permittees and members of the SMC led to a technical workshop in October 2005, associated with the first annual conference of the California Stormwater Quality Association.
 - Proceedings of the workshop were assembled and published by SCCWRP and USC Sea Grant in December 2005.
 - Interest in peak discharge and hydromodification issues is still high among Permittees and the SMC member agencies.
 - Ongoing research is being discussed to take up where the Public Works-funded study left off.
 - Permittees will continue participating with in-kind services and in a peer-review capacity in the SMC hydromodification impacts research and develop numeric criteria by December 10, 2010, or 6 months after publication of the SMC research, whichever is later.
 - Until that time, the interim peak-flow criteria will be enforced, applying to all areas draining directly or indirectly to natural streams.

The proposed changes in the study requirements are summarized in Table 1 as compared with the requirements under the existing Permit.

3. Integration of impaired water body specific programs.

4. Comparison of existing and proposed programs in addressing management questions by SMC.

The SMC's management questions for the Peak Discharge Impact Study are addressed in Table 2.

C. BMP Effectiveness Study

1. Existing Permit Requirements
 - Conduct or participate in studies to evaluate the effectiveness of structural and treatment control BMPs.
 - Monitor the reduction of pollutants of concern in stormwater for 5 or more different types of BMPs.
 - Evaluate the requirements, feasibility, and cost of maintenance for each BMP.
 - Develop recommendations for appropriate BMPs for the reduction of pollutants of concern in stormwater.
2. Issues and Recommendations
 - Five structural BMPs have been tested, including infiltration trench, catch basin inserts, enhanced manhole, hydrodynamic separator, wet vaults, and bioswale.
 - Detailed results are provided in Appendix H of the Los Angeles County 1994-2005 Integrated Receiving Water Impacts Report, which was submitted to Regional Board in August 2005.
 - Three of the tested BMPs warrant further evaluation, 1 will be evaluated by another agency, and 1 does not warrant further testing.
 - At least 2 replacement BMPs will be included in the study. The BMPs will be from those structural BMPs incorporated in the Permittees' Sun Valley Park Drain and Infiltration System project.
 - Because BMP evaluation for trash removal is already required under the Public Agency Activities Program, trash will not be one of the pollutants to be monitored.

The proposed changes in the study requirements are summarized in Table 1 as compared with the requirements under the existing Permit.

D. Participation in Studies Organized by the SMC

County Public Works was a founding member of the Southern California SMC and will continue to be an active member. Diligent efforts will be made to participate in ongoing or future studies organized by the SMC at various levels,

including peer review, in-kind services, and monetary contributions. In particular, Public Works will participate in the following studies:

- Regional Index of Biological Indicators
- Laboratory Intercalibration
- Reference Watershed Study
- Low Impact Development BMP Evaluation, Guidance and Training
- Stormwater Toxicity Protocols
- Peak Flow/Hydromodification Study

5.4 INTEGRATION OF IMPAIRED WATER BODY SPECIFIC PROGRAMS

Alignment of Permit-mandated monitoring with those required under other actions of the Regional Board should be required. The shoreline-monitoring program is a good example. Impaired water body monitoring programs and special studies currently in progress, or are expected to be conducted during the 2006 Permit cycle, have been summarized in Table 3. All impaired water body projects should be conducted by those Permittees, which are also responsible agencies for these impaired water bodies.

APPENDIX A – PERMITTEE PROGRAM ACCOMPLISHMENTS

Permittees have worked hard to comply with the 2001 NPDES Permit requirements and in certain instances have gone above and beyond the Permit requirements. The following are some examples of accomplishments provided by Permittees:

Public Information and Participation Program

- The Principal Permittee raised public awareness of stormwater pollution through the following efforts: Countywide media campaigns for the Stormwater Urban/Runoff and Used Motor Oil Recycling programs; the broadcast of pollution prevention public service announcements (PSAs) through the “4 Our Planet” media partnership with KNBC television station; and a partnership with the Heal the Bay and innovative K-12 environmental education programs. More than 153 million impressions were achieved.
- The Principal Permittee partnered with the Cities of the Malibu Creek Watershed to purchase “4 Our Planet” PSAs on KNBC television station targeting specific pollutants within the watershed.
- Principal Permittee ethnic outreach efforts included English, Spanish, and Chinese campaigns to promote used motor oil and filter recycling and stormwater pollution prevention to a Black, Latino, and Chinese population.
- Two community pilot projects, Florence Firestone and Union Pacific, were implemented to provide an opportunity for the general public, local business, and community leaders to participate in a beautification event and facilitate the beginning of a long-term goal of keeping their communities clean by educating others about pollution prevention with the collateral materials and the knowledge they acquired from County stormwater messages.
- Quarterly public outreach strategy meetings were organized and hosted annually by the Principal Permittee. Updates, information, and materials were provided to the Permittees to improve and enhance their outreach efforts and keep them informed about the Countywide media campaign.
- Over 10 BMP workshops were held for corporate managers of restaurant chains and retail gas station chains to facilitate the proper handling and disposal of materials to divert them from entering the storm drain system. Approximately 145 restaurant managers and corporate staff attended the training workshops.
- The Principal Permittee continues to conduct environmental education programs developed to meet the educational needs of students enrolled in grades K-12 and will enhance curriculum assessment and tracking efforts through its partnership with

the California Regional Environmental Education Consortium. More than 301,700 students in 436 schools received stormwater pollution prevention curriculum through these school outreach programs.

- The joint calendar project, coordinated across multiple watersheds, allowed participating cities to distribute to residents a full color, one-page, poster-type calendar delivering the stormwater pollution prevention message through compelling photographic images.
- The Ballona WMC developed and distributed a joint mailer to promote stormwater pollution prevention throughout the watershed. A bifold pamphlet was developed providing a “To Do” list of activities that could cause pollution and suggested things that individuals can do to reduce or eliminate the adverse impacts of these activities. 133,550 copies of the brochure were printed and distributed by the participating agencies via direct mailing or as inserts into newsletters.
- The City of Los Angeles’ Stormwater Program website had over 95,000 more hits in 2004-05 than the previous year. This 38 percent increase, along with responses to public surveys, indicate that the messages on preventing stormwater pollution, improving urban runoff water quality, and protecting our water resources are reaching an expanded audience.
- The City of Los Angeles’ Stormwater Public Education Program, in partnership with the California Coastal Commission and Malibu Foundation, cosponsored the 12th annual Ocean Day, Beach Clean at Dockweiler Beach on May 20, 2005.
- The City of Manhattan Beach has continued to promote awareness of stormwater pollution prevention through its “Ocean Safe City” message, which targets residents and businesses within the City. It is estimated that over half of the City’s residents (20,000) participated in the Hometown Fair, Household Hazardous Waste Awareness Week, and Earth Day events. The City operated a booth at each event and gave out stormwater educational material to both adults and children.
- The City of Rancho Palos Verdes promoted stormwater pollution prevention at several City sponsored events throughout the year, as well as using the City newsletter and other media outlets to inform and educate its residents about the importance of stormwater pollution prevention. The City participated with other Ballona Creek WMA Cities to develop and produce a cooperative mailer, and then distributed it to all single-family households within the City.
- The City of Rolling Hills Estates and the City of Rolling Hills jointly staff a public education booth at the 2-day annual Peninsula Street Fair. Teen volunteers conduct a hands-on demonstration using the County’s Enviroscape model with particular emphasis on targeted pollutants (pet waste, horse manure, fertilizers, and pesticides). After each demonstration, the teens distribute public education brochures such as the equestrian and landscaping BMP brochures and related

promotional items donated by the County. The City of Rolling Hills Estates also conducts the same outreach at its annual City Celebration.

- The Cities of Rolling Hills Estates and Rolling Hills distributed copies of USEPA/Weather Channel's video *After the Storm* and Algalita Marine Research Foundation's video *Plastics in the Open Ocean* to middle and high school environmental science teachers in public and private schools. All 6 periods of AP Environmental Science students at Palos Verdes Peninsula High School were shown these videos.
- The City of Alhambra staffs a public education booth at its annual Chinese New Year Celebration, Water Awareness Week, Seniors Health Fair, and Earth Day events where pollution prevention posters are displayed and public education brochures and related promotional materials are distributed (emphasis on trash, pet waste, homeowner maintenance such as landscaping and painting, and fertilizer and pesticide use). During some outreach events, the City's Enviroscope Model is demonstrated with the assistance of kids as the rainmakers.
- The City of Hermosa Beach invited restaurant owners/operators to a stormwater educational seminar to discuss the Municipal NPDES Permit and its implications pertaining to their day-to-day operations. The establishments were then inspected and rated. Those, which received the higher rates, were recognized by the City Council as the "Clean Ocean Establishment" and honored by receiving a certification and a sticker to display at their facility.
- The City of Hermosa Beach participated with other members of the Santa Monica Bay-Ballona Creek Watershed Management Committee to produce and mail 10,000 direct mail pieces to all Hermosa Beach residents. Another project through the joint effort was the development of the 2004 and 2005 calendars, which were produced and distributed to the public as a complimentary item.
- The City of Hermosa Beach has provided various PSAs to the local cable company in order to be aired as frequently as possible. These PSAs were obtained from different sources, such as Public Works and Earth 911. Where possible the PSAs were modified and tailored for the City's need. Examples were the "CAN-IT" and "Don't feed the Storm Drain" PSAs.
- The City of Signal Hill promoted local and Countywide stormwater pollution prevention programs and events on the City's cable television channel and website and in the Press Telegram and Signal Tribune newspapers. The City of Signal Hill's cable channel also reaches City of Long Beach residents and businesses.
- City of Signal Hill published in the Press Telegram a public education piece entitled "Think Environment" to raise public awareness of the importance of preventing stormwater pollution and promote the City's and County's stormwater pollution

prevention programs. This piece reached 109,000 newspaper subscribers in the Signal Hill/Long Beach area.

- City of Signal Hill developed pamphlets that are handed out to contractors and homeowners when issuing building/construction permits. These pamphlets explain the BMPs that should be implemented and is specific to the activities of the construction project such as painting or masonry/concrete work.
- West Hollywood received a Partners in Education grant from the Santa Monica Bay Restoration Commission to provide Russian/English pollution prevention posters/flyers, waterbrooms, and follow-up visits to area restaurants.
- In 2002, the City of Santa Clarita became aware that there was diazinon contamination in a local creek. With cooperation and assistance from Los Angeles County, the City launched a very aggressive campaign to abate the contamination. An intensive investigation effort, a focused public outreach campaign, and cooperation from local retailers and residents all lead to a 96 percent reduction of the initial diazinon levels. These efforts were implemented in compliance with the Regional Board's requirements and highlight the power of public outreach.
- The City of Santa Clarita is proud to continue its annual "River Rally," a river clean up and stewardship event. River Rally helps restore the Santa Clara River through picking up trash and debris and also helps educate local residents about the importance of protecting the environment. Over the past 11 years, River Rally has grown from 100 participants to over 1,400 last year. Participants range from the elderly to young children, with many youth organizations also lending their support. Everyone's enthusiastic efforts have made the event a great success the City is proud to sponsor. In fact, the City was honored by the Los Angeles Regional Board with the Water Quality Stewardship Award in 2004. Over the event's lifetime, volunteers have removed over 196,000 pounds of trash and debris that otherwise would have made its way downstream, affecting neighboring communities and the health of the river. River Rally's continuing popularity has helped City staff promote stormwater pollution prevention, litter prevention, air quality, household hazardous waste disposal, tree planting, and other environmental issues.
- The four Cities on the Palos Verdes Peninsula—Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, and Rolling Hills Estates—have partnered to run a ¼ page, full-color ad 4 times per year in the Palos Verdes Peninsula News on days of promotional circulation when distribution reaches every household on the Palos Verdes Peninsula. The advertisement design uses an award-winning ad concept and photograph that is tailored to target our watershed pollutants and behaviors of concern.
- Three Cities on the Palos Verdes Peninsula, Palos Verdes Estates, Rancho Palos Verdes, and Rolling Hills Estates, jointly hosted a restaurant BMP training workshop conducted by the County of Los Angeles. In addition to invitations mailed by the

County, this event was promoted through the City of Rolling Hills Estates' work with the Peninsula Chamber of Commerce and shopping center property management companies, one of which provided the meeting space for the workshop.

- The City of Culver City actively participated in environmental events, such as Children's Earth Day (Eco-station), Ballona Creek clean-up, Fiesta La Ballona, and Ballona Creek Marsh Fair.
- The City of Pasadena, in coordination with the County of Los Angeles, organized a Gardening Workshop. The workshop included stormwater-related issues and handouts to assist the public in reducing pollutants to the MS4.
- The City of Redondo Beach participated in the Heal The Bay Coastal Clean-up day by purchasing T-shirts and donating them to the volunteers of this program. The City also conducted educational activities at various organized events such as the event held at the Seaside lagoon by the Wyland foundation and the event at the SeaLab, which attracted many children. The City's Quarterly Newsletter publishes a regular stormwater-related advertisement that provides the community with a phone number if they have questions and the Adelphia Cable Company broadcasts various stormwater-related PSAs.
- The Mayor and City Council of Redondo Beach formed a Water Quality Task Force in August 2005 made up of a diverse cross section of the community, including individuals from teachers, youth, boaters, nonprofit, general public, chamber of commerce, and harbor businesses. Within 12 months the Task Force is to provide the City Council with recommendations that will address water quality in the harbor and other waterfront areas of the City.
- The City of Torrance has promoted local and Countywide stormwater pollution prevention programs during California Coastal Clean-up Day at Torrance Beach and at the City Yard Open House and the Health and Rideshare Fairs.
- The City of Torrance, in conjunction with Metropolitan Water District of Southern California, sponsors Protector Del Agua water efficient landscape classes on an annual basis that teaches residents how to design and maintain landscapes that use less water and therefore generate less urban run off. In addition, the 2 agencies developed a Water Wise native plant garden and demonstration a water efficient landscape garden at the Madrona Marsh Nature Center and provide corresponding brochures that demonstrate how these gardens look and how they can reduce irrigation water and run off.
- The Principal Permittee partnered with the Cities of Malibu Creek Watershed in the creation of the "Living Lightly in Our Watershed Guide", which was distributed to every household watershedwide. This guide has continued to be updated and distributed at Public Libraries, City Halls, and through the Las Virgenes Municipal Water District's new home buyer program.

- Newsletters containing a stormwater pollution prevention article and another on recycling and proper disposal of household hazardous waste were mailed to all 50,000 Burbank addresses including business.
- Stormwater education discussions and materials are passed out at all tours of the City of Burbank Recycling Center. This includes groups and visitors from near by elementary schools and community organizations. A mock demonstration of the watershed highlights all the water collection features in the City and stresses the importance of catch basins for stormwater runoff.
- The City of Vernon conducted a stormwater pollution prevention and compliance workshop geared for commercial and industrial businesses. Since there are over 160 facilities operating under the GIASP and over 800 facilities requiring an industrial/commercial inspection with the City of Vernon, the workshop has been instrumental in obtaining voluntary compliance for the Municipal Stormwater Permit and the GIASP. The City of Vernon also distributed bulk faxes to all businesses notifying them of important stormwater event information.
- The City of Los Angeles' Stormwater Public Education Program has received awards for many of its accomplishments, including:
 - 2005 American Public Works Association's (APWA) Diversity Exemplary Practices (Program/Organization Category) Award winner for its School Assembly/Ocean Day Program. (Fiscal Year 2004-05)
 - 2002 APWA project of the Year Award for its outreach to home improvement centers and pet stores, and for the cost savings realized by the City through public-private partnerships. (Fiscal Year 2002-03)
- The City of Los Angeles' Used Oil Recycling Public Education Program has received awards for many of its accomplishments, including:
 - 2004 *Togetherness Award* from the California Integrated Waste Management Board (CIWMB) in recognition of a public/private partnership that exemplifies outstanding coordination and cooperation in the implementation of a used oil collection program. The El Sereno public outreach program saw a 42 percent increase in the amount of oil collected at local collection centers. (Fiscal Year 2003-04).
 - 2003 CAL EPA Program Innovation Award for the "Your Street" public education campaign. (Fiscal Year 2002-03).
- The City, in partnership with the California Coastal Commission and Malibu Foundation, also cosponsored several annual Ocean Day, Beach Clean-Up events at Dockweiler Beach (Fiscal Years 2003-04 and 2004-05).

- In April 2005, the City of Los Angeles launched the “Los Angeles River – The Future is Now” public outreach campaign. (Fiscal Year 2004-05).
- The City of Hidden Hills provided and staffed a public outreach booth during the City’s Annual Fiesta Day events held on October 1 and 2 in 2005. The outreach booth provided residents with training and outreach materials and allowed the City to educate many of its residents on stormwater pollution prevention and BMPs used to minimize the amount of pollutants entering the City’s storm drains.
- The City of South Gate has completed installing inserts in all City-owned catch basins and has contracted for regular inspections and cleaning.
- Pasadena has passed an Ordinance to lower the threshold of the SUSMP application for the redevelopment projects from 5,000 square feet to 1,000 square feet and the same Ordinance includes provisions to include all hillside projects regardless of their size for the SUSMP application and the numerical limits.
- The City of Inglewood partnered with the County of Los Angeles during the CanIt campaign resulting in a successful clean-up day event. Staff regularly attends public events, such as Earth Day celebrations or West Basin Municipal Water District’s Water Harvest Festival to distribute stormwater information brochures, present stormwater pollution demonstrations, and provide commemorative giveaways. The City contacted and worked with Heal the Bay to identify a Beach Clean Up location in the Dominguez Watershed. Prior to this activity, only locations along the beach near the Dominguez Channel were clean-up spots. Heal the Bay supplied the City with stormwater pollution workbooks for kids, which staff distributed to the City’s Recreation Department and the School District. The City is contracted with Adopt-A-Waterway. The City also arranges for stormwater messages, such as the USEPA video *After the Storm*, to air on the City’s cable channel.

Industrial/Commercial Facilities Control

- The City of Signal Hill implemented pollutant reduction and control measures that resulted in the installation of an onsite stormwater detention system as part of a 12-acre Shopping Center development.
- West Hollywood assesses regulated businesses using an annual fee for NPDES inspections and is adding another fee for annual inspections of postconstruction BMPs.
- The City of Torrance and Metropolitan Water District of Southern California sponsor the Commercial and Industrial Institutional Conservation Program that provides a rebate of \$150 per Water Miser Boom, which are used to clean hard surfaces and use only 20 percent of the water previously used for wash down of hard surfaces and most of the water used evaporates or can be pushed toward landscaped areas, thereby virtually eliminating run off from surface cleaning.

- The City of Vernon has effectively integrated stormwater inspections with the inspections required under the Health and Environmental Control Department's jurisdiction, such as the Hazardous Materials Inspection Program, the Garment Inspection Program, the Food Processing Inspection Program, and the Solid Waste Inspection Program. The City of Vernon also conducted a stormwater pollution prevention and compliance seminar that promoted voluntary compliance of these facilities.
- The City of Los Angeles Inspection and Enforcement Program is a member of the City Attorney's multiagency environmental task force, which has launched several investigative initiatives against chronic health and safety and environmental violators for possible enforcement action and/or criminal prosecution. The combined authorities of the California Environmental Protection Agency, California Air Resources Board, Regional Board, California Department of Toxic Substances Control, Los Angeles County Health Hazmat Division, and many other agencies have targeted auto dismantlers, metal plating businesses, dry cleaners, and other industries through its Sun Valley, MacArthur Park, Wilmington, and Chrome Plating Initiatives. The inspections are a proactive response to community concerns involving quality-of-life issues. (Fiscal Years 2003-04 thru Fiscal Year 2005-06).

Development Planning

- The City of Rolling Hills Estates has adopted a landscaping ordinance that requires new landscapes to be designed to conserve water using a water budget approach. These requirements apply to new landscaping for commercial, office, and institutional developments and to developer-installed landscaping in residential subdivisions.
- The City of Manhattan Beach requires commercial trash enclosures to be fully enclosed and to be constructed with drainage to the sanitary sewer system. The purpose of these construction requirements is to prevent stormwater contact with the trash enclosures and to prevent water that does come in contact with the enclosures from entering the storm drains. The City reviews building plans for the trash enclosure requirements and has been proactive in reaching out to businesses to increase awareness of the requirements.
- The City of Rolling Hills' Zoning Ordinance contains strict development standards for development ratios on each property—the City is entirely residential with minimum lot sizes of one acre. Only 35 percent of the net lot area may be developed with impervious surfaces, including all structures, patios, and other paved areas. Given that the minimum lot size in the City is 1 acre, this provision promotes infiltration of stormwater into the ground and not onto streets. The City's water efficient landscaping ordinance requires use of a water budget and utilization of native and/or drought resistant vegetation while preserving established native flora and natural features of the lots.

- The City of Rolling Hills encourages residents to install pervious surfaces when landscaping or installing/reconstructing driveways. Many residents have replaced their driveways with grass-crete and other porous material. Access to stables is encouraged to be gravel and not paved. The City's Zoning Ordinance precludes large impervious surfaces, i.e., driveways may not cover more than 20 percent of the area of the yard in which they are located; uncovered motor courts/parking pads may not cover more than 10 percent of the yard in which they are located. Tennis courts and sports courts are encouraged to have pervious surfaces. Additionally, the County implements the hillside home requirement that roof runoff be diverted to vegetated areas for all new development within the City.
- The City of Santa Clarita requires a “solid roof” for the trash enclosures on all development and redevelopment projects that have trash requirements.
- The City of Vernon has implemented specific postconstruction inspection, maintenance, and mitigation plan requirements for operators of all treatment control BMPs, which are designed to retain water. Approval for the installation of a water retaining BMP is performance based and requires the implementation of a maintenance plan. The plan consists of weekly BMP inspections (during presence of water in BMP), accurate inspection and maintenance logs, and a plan of action in the event that a vector problem is discovered. These requirements are a result of vector control concerns where treatment control BMPs product manufacturers fail to provide an adequate vector exclusion device or attachment for their water retaining product. Compliance determination is achieved through the Vernon Industrial/Commercial Inspection Program.
- In November 2003, the City hosted a day-long conference at the USC Davidson Center to educate the land development industry on SUSMP and Site Specific Mitigation requirements, and how to negotiate the City's permitting process. (Fiscal Year 2003-04)

Development Construction

- The City of Rolling Hills implements strict grading practices. Only 40 percent of the net lot area of a lot may be disturbed during construction. The City does not allow import or export of soil from construction projects so that all grading must be balanced on-site.
- The City of Torrance developed local pamphlets that are handed out to contractors and homeowners when issuing building/construction permits. These explain the BMPs that should be implemented and is specific to activities of the construction project.

Public Agency Activities

- Runoff from wash racks at the Rolling Hills Estates municipal stables is diverted to the sanitary sewer via an approved pretreatment permit. Pretreatment of this runoff consists of screening to remove horsehair and gross solids.
- The City of Rolling Hills Estates has a proactive litter abatement program for keeping public rights-of-way, streets, medians, parks, and trails free of litter and debris. It also has a successful Adopt-a-Trails Cleanup and Maintenance program. The City has accelerated street sweeping with all public streets swept twice per month. The City has placed recycling bins for beverage containers in a number of City parks and commercial areas.
- The City of Hermosa Beach operates an aggressive Public Agency Program, which includes street sweeping and catch basin cleaning activities. In addition, the City has outfitted 60 percent of its own and 100 percent of the County-owned (downtown area) catch basins with inserts to help reduce the amount of debris entering the storm drain system. An annual contract with a private contractor is funded to ensure proper cleaning and maintenance of the installed devices.
- The City of Signal Hill established an E-Waste Collection Program to collect and recycle electronic waste that was dumped in the public right-of-way. The City also established a Curbside Collection Program for used motor oil. Do-it-yourselfers are provided a free used motor oil/filter container that can be left at the curbside and collected by the City for recycling. Approximately 150 gallons of used motor oil is recycled annually through this program.
- The City of Signal Hill established the Willow Street/Cherry Avenue Corridor Clean-Up Program. This program collects trash and debris along the City's 2 busiest commercial corridors on a weekly basis.
- The City of Signal Hill has expanded its Bus Shelter Cleaning Program from 1 cleaning per week to 3 cleanings per week.
- The City of Signal Hill installed pet waste collection stations at City parks and along its trail systems. The pet waste collection stations have proven to be successful as they are highly used.
- The City of Signal Hill serves as the lead agency in a partnership with the City of Long Beach and the County of Los Angeles on the Hamilton Bowl Trash Reduction project. This project will construct and evaluate the effectiveness of various trash removal devices in removing trash from stormwater runoff.
- West Hollywood has installed debris excluders with grant funds from the California Coastal Conservancy, Los Angeles County, and the City's General Fund.

- West Hollywood's porous pavement parking lot at Spaulding Avenue was awarded the American Public Works Association's Project of the Year Award and the Outstanding Government Project Award from the American Society of Civil Engineers.
- West Hollywood provides daily hand pick up of litter and street sweeping services on major arterials.
- In an effort to prevent illegal disposal of household hazardous waste (HHW) and to provide residents a safe and responsible means of HHW disposal, the City of Santa Clarita has implemented a very successful door-to-door HHW collection program. During the term of the 2001-2006 NPDES Permit, Santa Clarita has collected over 356,857 pounds of hazardous waste with over 3,880 households participating.
- The Santa Clara River Steering Committee was recognized for its work in the restoration of the local watershed and was honored with the 2003 Water Quality Award for Water Body Restoration.
- The Rolling Hills City Hall area is landscaped with native and drought resistant plants and maintained with minimal irrigation and application of fertilizers and pesticides.
- The City of Carson constructed approximately 4,000 feet of landscaped median islands. As an erosion control measure, the City also constructed rolled asphalt concrete curbs on all properties adjacent to the street where erosion has been a problem.
- The City of Culver City was awarded a grant totaling \$1.252 million for structural stormwater BMPs. The grant project, which consists of the following multifunctional BMPs, will be completed by June 2008:
 - Two bioretention cells or rain gardens in City parks that will provide infiltration, pollution remediation for multiple pollutants, and aesthetic recreational medium for the public.
 - Six hundred seventy two innovative, 2-tiered catch basin inserts that will provide full-capture for gross pollutants, including trash.
 - Five hundred low-flow, high-pressurized water broom for critical or potentially high polluting businesses to reduce/eliminate nuisance flows and prevent dry-weather pollution from commercial areas. Bilingual door-to-door education will be provided to business employees to ensure sustained and consistent use of water brooms.
 - Fifty tamper-free recycling bins and trash receptacles in high trash-generating areas, such as schools and convenience stores.

- The City of Pasadena temporarily blocks catch basins during events, such as the Rose Parade, where there is an elevated risk of excessive trash entering the storm drain system.
- The City of Santa Clarita, through its negotiations with its residential solid waste hauler, successfully negotiated the free collection of E-Waste through its bulky item collections program. Now residents can have up to 4 free bulky item collections per year of up to 3 items per collection.
- The City of Burbank continues to perform street sweeping of all City streets once a week. This level of street cleaning helps to remove potential contaminants from reaching the catch basins.
- All City of Burbank employees involved with stormwater management and pollution prevention are provided with a wallet-size card containing contact information to address stormwater concerns from the public as well as a list of allowable discharges.
- City of Los Angeles voters overwhelmingly supported Proposition O, the Clean Water, Ocean, River, Beach, Bay Storm Water Cleanup Measure – General Obligation Bonds, on November 2, 2004. Proposition O passed with nearly 76 percent of City residents voting “yes” on the proposition.
- Data from the City of Los Angeles Status and Trends Monitoring Program, which was established to characterize indicator bacteria levels and heavy metal pollutants in the Los Angeles River, Ballona Creek, and Dominguez Channel watersheds, has been used for a variety of purposes, including TMDL development by regulatory agencies, determining baseline pollutant levels referenced in Sanitary Sewer Overflow sampling protocol, and for prioritizing watershed management strategies.
- The City of Los Angeles installed 4 floating wetland islands in Echo Park Lake to reduce nutrient loads and other pollutants associated with urban runoff. Two additional wetland islands were installed in MacArthur Park Lake and Debs Park Pond, respectively. (Fiscal Years 2004-05 and 2005-06)

Illicit Connections/Illicit Discharges Elimination

- The City of Rolling Hills Estates revised its solid waste ordinance to enhance its code enforcement authority over improper disposal of manure among the equestrian community. The ordinance requires that manure be kept in an enclosed storage container and removed at least once per week, or that manure used for composting be kept in an enclosed composting container. The City facilitates this requirement by offering enclosed manure storage containers and curbside manure removal service with off-site composting through its residential solid waste franchise agreement.

- Manure collection and off-site composting services for owners of horses is available through the City of Rolling Hills' franchise waste hauler.
- The City of Pasadena has established a separate hotline for reporting illicit discharges. The number is 626-744-STRM.
- The City of Vernon has effectively integrated illicit discharge and illicit connection detection and elimination procedures with the inspections required under the Health and Environmental Control Department's jurisdiction (i.e., Hazardous Materials Inspection Program, the Garment Inspection Program, the Food Processing Inspection Program, and the Solid Waste Inspection Program). All facilities inspected, regardless if the facility is covered under the Vernon Commercial/Industrial Inspection Program, are evaluated to ensure there are no illicit discharges from the facility.

TMDL Program

- The City of Los Angeles is leading the stakeholder group CREST (Cleaner Rivers through Effective Stakeholder TMDLs), whose participants include the USEPA, Regional Board, local jurisdictions, environmental groups, and other agencies to develop TMDLs for cleanup of the Los Angeles River and Ballona Creek Watersheds. CREST seeks input from all stakeholders to develop work plans, to define and perform special studies, and to develop monitoring and implementation strategies. (Fiscal Year 2004-05)
- Since approval of the Los Angeles River and Ballona Creek Trash TMDLs in September 2001, the City of Los Angeles has developed an Implementation Strategy and Plan that relies on both institutional and structural BMPs to comply with the TMDL waste load allocations. The installation of the structural BMPs have been prioritized in the high-trash generation areas of the City with the following BMPs installed to date: 8 netting systems; 10 hydrodynamic devices; 5 outlet screens; 1,400 catch basin inserts; and 4,100 catch basin opening screen covers.

BMP and Capital Improvement Projects

- Wetlands were constructed by the City of Los Angeles in AF Hawkins Park in South Los Angeles that will treat on-site stormwater runoff and will serve as a water feature that enhances the park's aesthetic values. (Fiscal Year 2004-05)
- The City of Los Angeles and the Los Angeles County Flood Control District are developing the Tuxford Green project as a joint project that will decrease flooding and improve stormwater quality at the intersection of Tuxford Street and San Fernando Road. Underground cisterns will be built to remove trash, debris, oil and grease, and suspended pollutants. A demonstration landscaping feature will

also be constructed above the cisterns to be irrigated in part by the retained water. (Fiscal Year 2004-05)

- Construction began in July 2004 on improvements, including nontraditional stormwater management techniques, at the City's Sun Valley Park and Recreation Center. The City of Los Angeles, the Los Angeles County Flood Control District, area residents, businesses, and environmental groups developed this pilot project that will alleviate local flooding, enhance recreational opportunities, and demonstrate the effectiveness of nontraditional stormwater management techniques. (FY 03-04)
- As part of the City of Los Angeles' LowFlow Diversion (LFD) Program, 7 LFDs were constructed to prevent/eliminate beach closures in Santa Monica Bay during the summer months. The City received the 2004 National Environmental Achievement Award for Public Service from the American Municipal Sewerage Agencies (AMSA) upon completion of this project.

Los Angeles River Programs

- Established in March 2005, the City of Los Angeles has led the Los Angeles River Plastics Initiative Industry Task Force to develop recommendations on reducing plastic bag litter in the river. Task force members include a cross-section of representatives from industries that manufacture or distribute plastic bags and polystyrene products, retailers, waste and recycling interests, environmental and Los Angeles River Watershed advocacy groups, and City staff. (Fiscal Year 2004-05)
- In May 2004, the City of Los Angeles hosted a day-long conference at the USC Davidson Center for the scientific community regarding the science and biology of the Los Angeles River. The conference included presentations on the current water quality and habitat monitoring efforts taking place along the Los Angeles River, and concluded with a 6-member panel discussing the critical issues facing the Los Angeles River. (Fiscal Year 2003-04)

Interagency Coordination and Planning

- The City of Los Angeles has embarked on developing an Integrated Resources Plan (IRP) that addresses the facility needs of the City's wastewater, recycled water, and urban runoff/stormwater management programs through the year 2020. The County and municipalities neighboring the City are active participants in the IRP process. It is anticipated that this effort will benefit individual stormwater programs and overall interagency coordination. (Fiscal Year 2003-04)
- The City of Los Angeles is working with the Los Angeles Unified School District (LAUSD) and Tree People to incorporate stormwater BMPs in the design guidelines for schools. This cooperative effort is part of LAUSD's school construction and

renovation program. The City's 3 goals are for the schools to: 1) retain all stormwater on-site; 2) reuse or recharge all stormwater on-site; and 3) incorporate off-site water, whenever feasible. (Fiscal Year 2004-05)

Table 1 Proposed Changes between Order 01-182 and New Permit

	Program	Existing Requirements	Proposed Requirements
CORE MONITORING	Mass Emissions Monitoring	Monitor 3 storms $\geq 0.25"$ (Including first) and 2 dry weather flows Monitor all storms of 0.25 inches or more for TSS Correlate TSS with other Constituents	Monitor 2 Storms $\geq 0.25"$ (Including first) and 2 dry weather flows Discontinue Separate TSS Monitoring Discontinue TSS Correlation
	Water Column Toxicity Monitoring	Perform Ceriodaphnia dubia (water flea) 7-day survival/reproduction and Strongylocentrotus purpuratus (purple sea urchin) fertilization tests for 2 storms (including first) and 2 dry weather flows at Mass Emission Sites.	Perform Ceriodaphnia dubia (water flea) 7-day survival/reproduction for 2 storms and 1 dry weather event at Mass Emission Sites. If the results from the first dry weather event are toxic, perform an additional C. dubia (water flea) test on the second dry event. Perform Strongylocentrotus purpuratus (purple sea urchin) fertilization tests for 2 storms (including first) and 2 dry weather flows at Mass Emission Sites.
		No Tributary Monitoring Component	Perform Ceriodaphnia dubia (water flea) 7-day survival/reproduction and Strongylocentrotus purpuratus (purple sea urchin) fertilization tests for 2 storms (including first) and 2 dry weather flows at Tributary Monitoring Sites. Testing protocol should be the same as for Mass Emissions Sites.
	Shoreline Monitoring	Responsibility of City of LA	Joint responsibility for those Permittees which discharge to an impaired water body.
		A combination of daily and weekly monitoring at 18 Santa Monica Bay locations.	Align the Permit with impaired water bodies by conducting weekly monitoring throughout Santa Monica Bay as described in the Coordinated Shoreline Monitoring Program approved by the Regional Board on April 28, 2004.
Tributary Monitoring	Monitor 4 storms $\geq 0.25"$ (Including first) and 1 dry weather flows	Monitor 3 Storms $\geq 0.25"$ (Including first) and 2 dry weather flows.	
	No Toxicity Testing at Tributary Monitoring Sites	Analyze toxicity at Tributary Sites for 2 storms and 2 dry weather events. See Water Column Toxicity Monitoring above.	
REGIONAL MONITORING	Estuary Sampling	Participate on the Bight 2003 study's steering committee	Participate on the Bight 2008 study's steering committee
		Sample a maximum of 25 sites in each estuary (Ballona Creek, Malibu Creek, LA River, SG River, and Dominguez Channel) once during the permit term	Consult with SCCWRP and Regional Board to formulate follow-up questions for Bight 2003, including but not limited to:
		Sample 25 sites outside of the direct outfalls to assess cumulative effects	1. What are the specific toxicants causing recurring sediment toxicity in Ballona Creek Estuary? Dominguez Channel Estuary?
		Analyze all samples for: Sediment chemistry (priority pollutants), Total Organic Carbon (TOC), Grain size, Sediment toxicity	2. What are sources of urban runoff that contribute to sediment toxicity?
Create a map of each estuary depicting degraded areas and the spatial distribution of sediment from storm water	3. Partitioning coefficients between water column and sediment?		
Suggest appropriate locations for regular sediment monitoring based on the results of this study.	4. Suspended sediment toxicity sampling protocol?		
	5. Sediment transport mechanism and deposition patterns?		
	6. What is the state of current technology available to reduce toxicant loading from urban and storm runoff? The number of studies conducted depends on funding availability.		
Bioassessment	Participate in the SMC and with the SWAMP in development of a regional Index of Biological Integrity (IBI)	Continue participation in the development and testing of regional IBI.	
	Perform bioassessment monitoring every October	Perform in spring to coordinate with other Regional Bioassessment Monitoring efforts from the San Gabriel River Regional Program.	
	Monitor a minimum of 20 sampling sites and coordinate with SWAMP in site selection.	No change.	
	Collect a minimum of three replicate samples at each site	No change.	
Submit annual monitoring report containing all physical, chemical, and biological data collected and analyzed during bioassessment	No change.		
SPECIAL STUDIES	New Development Impact Study	Water quality model simulations for a multi land use watershed to evaluate impact of watershed development and SUSMP effectiveness Dry and wet weather monitoring at the selected watershed	No change is proposed. Continue the existing requirements until project completion. Participate in the SMC's Low Impact Development study.
	Peak Discharge Impact Study	Develop numeric criteria to control/reduce the post-development peak flow impact	Provide in-kind services support in the SMC hydromodification impacts research and develop numeric criteria by Dec. 10, 20010, or 6 months after publication of the SMC research, whichever is later.
	BMP Effectiveness Study	Test at least five types of structural BMPs for their feasibility, cost of maintenance, and removal performances of pollutants (trash, suspended sediments, pathogen indicators, nutrients, heavy metals, and oil and grease)	Continue the study with three previously tested and two new BMPs for more storm events. Remove trash from the list of pollutants to be monitored, because BMP evaluation for trash removal is already required under the Public Agency Activities Program.
	Studies associated with the SMC	None	Regional IBI§ Laboratory Inter calibration§ Reference Watershed Study§ Low Impact Development Guidance and Training§ Stormwater Toxicity Protocols§ Peak Flow/Hydromodification

Table 2. Relevance to core management questions set forth under the Model Monitoring Program.

		Question 1: Are conditions in receiving waters protective, or likely to be protective, of beneficial uses?	Question 2: What is the extent and magnitude of the current or potential receiving water problems?	Question 3: What is the relative urban runoff contribution to the receiving water problem(s)?	Question 4: What are the sources to urban runoff that contribute to receiving water problem(s)?	Question 5: Are conditions in receiving waters getting better or worse?	
CORE MONITORING	Mass Emissions Monitoring	Current Program	This program examines flows as they pass by Mass Emission Sites (MES). Conditions in receiving waters upstream and downstream of the sites are not directly measured, but characterization of flows at the MES can be used to infer conditions in adjacent receiving waters.	This program is not intended to directly measure conditions in receiving waters.	This program characterizes urban runoff and other flows that pass through the MS4 system. Other inputs into receiving waters must also be analyzed in order to use this program to evaluate relative contributions from the MS4 system.	The Mass Emissions Monitoring Program can only identify pollutant sources at the watershed level.	Data collected under this program can be analyzed for trends. However, at this point in time the data set is too small to determine long term trends. This program is designed to monitor water quality at specific sites and does not directly examine receiving waters upstream or downstream of the MES.
		Proposed Program	This program will continue to examine flows as they pass by Mass Emission Sites (MES). Conditions in receiving waters upstream and downstream of the sites are not directly measured, but characterization of flows at the MES can be used to infer conditions in adjacent receiving waters.	This program is not intended to directly measure conditions in receiving waters.	This program continues to characterize urban runoff and other flows that pass through the MS4 system. Other inputs into receiving waters must also be analyzed in order to use this program to evaluate relative contributions from the MS4 system.	The proposed program will continue to identify pollutant sources only at the watershed level.	Data will continue to be collected such that long term trends can be analyzed in the future. This program is designed to monitor water quality at specific sites and does not directly examine receiving waters upstream or downstream of the MES.
	Water Column Toxicity	Current Program	The current program provides sufficient information to determine if waters discharged from the MS4 system are toxic to certain insects and sea urchins during 4 events per year. This can be used to infer effects on beneficial uses in the receiving waters.	This program is not intended to directly measure conditions in receiving waters.	This program characterizes the toxicity of urban runoff and other flows that pass through the MS4 system. Other inputs into receiving waters must be analyzed in order to use this program to evaluate relative contributions from the MS4 system.	This program can be used to identify the sources of toxic pollutants.	While the current data set is too small to determine long term trends in toxicity at the mass emission stations, it forms the baseline of toxicity which can be used to determine long term trends in the future. This program is designed to monitor water quality at specific sites and does not directly examine receiving waters upstream or downstream of the MES. However, inferences can be made about the water quality in adjacent
		Proposed Program	The proposed program will provides sufficient information to determine if waters discharged from the MS4 system and from six tributaries are toxic to certain insects and sea urchins during 3 to 4 events per year. This can be used to infer effects on beneficial uses in the receiving waters.	This program is not intended to directly measure conditions in receiving waters.	This program continues to characterize the toxicity of urban runoff and other flows that pass through the MS4 system. Other inputs into receiving waters must be analyzed in order to use this program to evaluate relative contributions from the MS4 system.	This program will continue to have the potential to identify the sources of toxic pollutants.	Continuing to collect toxicity data, including that from tributaries, will increase the size of the data set and allow for trend determination at specific locations within the MS4 system. This program is designed to monitor water quality at specific sites and does not directly examine receiving waters upstream or downstream of the monitored locations. However, inferences can be made about the water quality in adjacent receiving waters.

Table 2. Relevance to core management questions set forth under the Model Monitoring Program.

		Question 1: Are conditions in receiving waters protective, or likely to be protective, of beneficial uses?	Question 2: What is the extent and magnitude of the current or potential receiving water problems?	Question 3: What is the relative urban runoff contribution to the receiving water problem(s)?	Question 4: What are the sources to urban runoff that contribute to receiving water problem(s)?	Question 5: Are conditions in receiving waters getting better or worse?	
CORE MONITORING	Shoreline Monitoring	Current Program	This program measures bacteria levels in receiving shoreline waters and can be used to evaluate impacted beneficial uses.	This program is designed to evaluate water quality conditions at the shore and does not examine waters inside the watershed. Bacteria levels measured in the receiving waters at the shore can be evaluated over time to determine trends.	This program measures bacteria levels near outlets of the MS4 system. However, the specific contribution from urban runoff and other sources is not measured.	Sampling stations have been located near storm drain outlets to measure bacterial loads discharged through the MS4 system. Impaired water body development studies all potential sources for bacteria.	The program measures exceedences of water quality objectives and this data can be analyzed for long term trends. This program measures receiving water conditions (bacteria levels) at the shoreline.
		Proposed Program	This program will continue to measure bacteria levels in receiving shoreline waters and can be used to evaluate impacted beneficial uses.	The program will continue to evaluate shore water and not focus on waters inside the watershed. As additional data is collected, trend analysis will continue for shoreline receiving waters.	Impaired water body specific programs have provisions for source inventories and may include source identification studies which will better define all sources, including contributions from urban runoff.	Implemented impaired water body specific programs have provisions for source inventories.	The program will continue to measure exceedences of water quality objectives which will be analyzed for trends. This program will measure receiving water conditions (bacteria levels) at the shoreline.
	Tributary Monitoring	Current Program	This program examines flows as they pass by Tributary Monitoring Sites(TMS). Conditions in receiving waters upstream of the sites are not directly measured, but characterization of flows at the TMS and the MES can be used to estimate conditions between the TMS and MES as well as in adjacent receiving waters.	This program is not intended to directly measure conditions in receiving waters but measurements at the TMS and MES can be used to estimate receiving water conditions in the reaches between	This program characterizes the toxicity of urban runoff and other flows that pass through the MS4 system. Other inputs into receiving waters must be analyzed in order to use this program to evaluate relative contributions from the MS4 system.	Tributary Monitoring identifies subwatersheds which contribute higher loads of pollutants and can be used to identify specific sources.	Subwatersheds are only being monitored for 2 years each and there is not sufficient data at this time to determine a trend. However, data collected under this program can be used for trend analysis if and when the tributary sites are remonitored in the future. This program is designed to monitor water quality at specific sites and does not directly examine receiving waters upstream or downstream of the monitored sites.
		Proposed Program	This program will continue to examine flows as they pass by Tributary Monitoring Sites(TMS). Conditions in receiving waters upstream of the sites are not directly measured, but characterization of flows at the TMS and the MES can be used to estimate conditions between the TMS and MES as well as in adjacent receiving waters.	This program is not intended to directly measure conditions in receiving waters but measurements at the TMS and MES can be used to estimate receiving water conditions in the reaches between	This program continues to characterize the toxicity of urban runoff and other flows that pass through the MS4 system. Other inputs into receiving waters must be analyzed in order to use this program to evaluate relative contributions from the MS4 system.	The Tributary Monitoring Program will continue to identify subwatersheds with higher pollutant loadings and could be used to identify specific sources.	The program continues to collect data at tributary sites which can be used in the future to analyze trends at those locations. This program is designed to monitor water quality at specific sites and does not directly examine receiving waters upstream or downstream of the monitored sites.

Table 2. Relevance to core management questions set forth under the Model Monitoring Program.

			Question 1: Are conditions in receiving waters protective, or likely to be protective, of beneficial uses?	Question 2: What is the extent and magnitude of the current or potential receiving water problems?	Question 3: What is the relative urban runoff contribution to the receiving water problem(s)?	Question 4: What are the sources to urban runoff that contribute to receiving water problem(s)?	Question 5: Are conditions in receiving waters getting better or worse?
REGIONAL MONITORING	Estuary Sampling	Existing Program	Designed to answer this question, the program has found that some of the LA County estuaries may not be protective of beneficial uses.	Designed to answer this question, the program has delineated the extent and magnitude of the problem.	Program has identified urban runoff as the primary contributor to receiving water problems.	The program was not designed to answer this question.	By its cyclical nature, the bight monitoring program addresses this trend question.
		Proposed Program	Funding would be shifted away from this question to address question 4 as well as how to reduce toxicant loading from urban runoff.	Funding would be shifted away from this question to address question 4 as well as how to reduce toxicant loading from urban runoff.	Funding would be shifted away from this question to address question 4 as well as how to reduce toxicant loading from urban runoff.	Permittees' funding for Bight 2008 would be devoted to answer this question as well as how to reduce toxicant loading from urban runoff.	Funding would be shifted away from this question to address question 4 as well as how to reduce toxicant loading from urban runoff.
	Bioassessment	Existing Program	The study intends to evaluate the biological impact that pollution has on receiving waters within Los Angeles County.	The task identifies a broad range of receiving waters throughout the County including reference sites and highly developed areas to assess the "health" of the water bodies.	The study compares highly urbanized and reference site water bodies to evaluate the qualitative affects of urban runoff on stream biology.	The program provides a general comparison between stream environments and characterizes the biological integrity of water bodies. It does not attempt to target sources of pollutant contribution.	Bioassessment allows for the analysis of relative biological degradation within water bodies. All sites have shown marginal improvement, and they appear to have not degraded.
		Proposed Program	no change	Coordinating efforts with other bioassessment monitoring programs in the region has the potential to provide a broader range of comparative information that will allow for more robust trend analysis and knowledge of the extent and magnitude of bioassessment issues in Los Angeles County.	no change	By aligning monitoring sites with MES and tributary core monitoring sites, water quality and toxicological data can be evaluated in conjunction with biological conditions. If trends are observed, it may be easier to provide source assessment.	no change
SPECIAL STUDIES	New Development Impact Study	Existing program	The required monitoring program identifies the current load of the pollutants at the watershed outlet. Obtained load can be used to determine the beneficial use of receiving water	Same as Question No. 1	The model simulations can identify impact of watershed development in the increase of pollutant loading to receiving waterbody. The reduction of pollutants in urban runoff with SUSMPs can also be evaluated by the model.	The modeling study and monitoring at the outlet of the watershed are not intended to identify the specific sources of the pollutant but to evaluate the effectiveness of SUSMPs in reduction of pollutants in the receiving water.	Successfully implemented SUSMP can reduce the pollutant loading with appropriate combinations of BMPs for different type of land use.
		Proposed New program	no change	no change	no change	no change	no change
	Peak Discharge Impact Study	Existing program	The enhanced stream channel erosion has been observed as a result of increased peak discharge from watershed development.	The study intends to evaluate the magnitude of the increased erosion directly caused by watershed development.	The study compares the naturally occurring stream channel erosion with the one enhanced by the upstream watershed development	The increased peak discharge from watershed development is known to enhance stream channel erosion.	Numerical criteria to be used for future watershed development can help minimize the stream erosion.
		Proposed New program	no change	no change	no change	no change	Interim Peak Flow Standard has been implemented to protect the natural stream.
	BMP Effectiveness Study	Existing program	The required monitoring program identifies the current load of the pollutants within the	Same as Question No. 1	Same as Question No. 1	Same as Question No. 1	Successfully identified BMPs can reduce the pollutant loading.
		Proposed New program	no change	no change	no change	no change	no change

Table 3. Impaired water body specific monitoring programs and special studies that are, or will be, conducted by Permittees.

Requirement	Impaired Water Body	Project Description	Status
Coordinated Shoreline Monitoring Program	Santa Monica Bay Beaches Bacteria for Dry and Wet Weather	Weekly shoreline bacteria water quality monitoring at 60+ locations throughout Santa Monica Bay.	This program was approved the the Regional Board in April 2004. Monitoring commenced in November 2004.
Main Ship Channel Bacteria Water Quality Study	Los Angeles Harbor Bacteria	A one-year sampling program to assess the bacteriological water quality in the Inner Harbor and Main Ship Channel of Los Angeles Harbor.	Work plan was approved by the Regional Board in September 2005.
Coordinated Monitoring Plan	Los Angeles River Nutrients	A monitoring program to measure an improvement in the impaired water body.	Submitted to Regional Board in March 2005. Awaiting approval.
Bacteria Nonpoint Source Study	Marina del Rey Harbor Bacteria	A one-year study to determine the relative bacterial loading from sources including storm drains, boats, birds, and other nonpoint sources.	In progress. Final report will be submitted to the Regional Board by March 2007.
Coordinated Monitoring Plan	Marina del Rey Harbor Bacteria	A monitoring program to measure ambient water quality as well as an improvement in the impaired water body.	Originally submitted to the Regional Board in July 2004. The plan is currently being revised to incorporate Regional Board's comment.
Reference Watershed Study	Malibu Creek and Lagoon Watershed Bacteria	A one-year study to establish a defensible bacteriological reference condition for the Malibu Creek and Lagoon watershed.	Expect to begin in July 2006. Final project report will be submitted to the Regional Board by January 2008.
Bacteria Water Quality Monitoring Plan	Malibu Creek and Lagoon Watershed Bacteria	A monitoring program to measure ambient water quality as well as an improvement in the impaired water body.	Submitted to Regional Board in May 2006. Awaiting approval.
Coordinated Monitoring Plan	Ballona Creek Metals	A monitoring program to measure ambient water quality as well as an improvement in the impaired water body.	Due to the Regional Board in January 2007.
Coordinated Monitoring Plan	Ballona Creek Estuary Toxic Pollutants	A monitoring program to measure ambient sediment quality as well as an improvement in the impaired water body.	Due to the Regional Board in January 2007.

Table 3. Impaired water body specific monitoring programs and special studies that are, or will be, conducted by Permittees.

Requirement	Impaired Water Body	Project Description	Status
Coordinated Monitoring Plan	Los Angeles River Metals	A monitoring program to measure ambient water quality as well as an improvement in the impaired water body.	Due to the Regional Board in April 2007.
Coordinated Monitoring Plan	Ballona Creek Bacteria	A monitoring program to measure ambient water quality as well as an improvement in the impaired water body.	This impaired water body is scheduled to come into effect in March 2007.
Water Column-Sediment Partitioning Coefficients	Marina del Rey Harbor Toxic Pollutants	A study to evaluate partitioning coefficients between water column and sediment to assess the contribution of water column discharges to pollutant concentrations in the benthic sediments of the harbor.	Due to the Regional Board by March 2011.
Low Detection Level Techniques	Marina del Rey Harbor Toxic Pollutants	study is to evaluate the use of low detection level techniques to determine water quality concentrations for those contaminants where standard detection limits cannot be used to assess compliance for California Toxic Rule standards or are not sufficient for estimating source loadings from tributaries and storm water.	Due to the Regional Board by March 2011.
Coordinated Monitoring Plan	San Gabriel River Metals	A monitoring program to measure ambient water quality as well as an improvement in the impaired water body.	This impaired water body is scheduled to come into effect in March 2007.
Coordinated Monitoring Plan	Los Angeles River Bacteria	A monitoring program to measure ambient water quality as well as an improvement in the impaired water body.	This impaired water body is scheduled to come into effect no later than 2012.



California Regional Water Quality Control Board

Los Angeles Region

RB-AR070



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

July 12, 2006

Mr. Mark Pestrella
Assistant Deputy Director
Watershed Management Division
County of Los Angeles Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

and

Los Angeles County Municipal Storm Water Permittees

REVIEW OF THE REPORT OF WASTE DISCHARGE FOR THE REISSUANCE OF THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM WATER DISCHARGE PERMIT FOR THE COUNTY OF LOS ANGELES AND PERMITTEES (NPDES No. CAS004001, ORDER No. 01-182)

Dear Mr. Pestrella:

We have received the Report of Waste Discharge (ROWD) submitted on June 12, 2006 for reissuance of the County of Los Angeles Municipal Storm Water Discharge Permit (LA MS4 Permit). The County of Los Angeles and Permittees are currently covered under Regional Board Order No. 01-182, which expires on December 12, 2006. Two Permittees currently covered under Order 01-182 have submitted separate ROWD's (City of Downey and City of Signal Hill) for their own MS4 Permit. A fourth ROWD was received for a portion of the San Gabriel River Watershed which only includes the Cities of Azusa, Claremont, Glendora, Irwindale, and Whittier. For purposes of the LA MS4 Permit renewal, the cities of Azusa, Claremont, Downey, Glendora, Irwindale, Signal Hill, and Whittier are excluded, and among other things will be responsible for their own storm water management programs and monitoring programs, if they pursue separate MS4 Permits.

Our review of the ROWD indicates that while the Permittees are proposing some positive changes, other areas of the ROWD do not satisfy federal storm water regulations contained in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (61 Fed Reg. 41697). Some of the inadequacies include:

1. The elimination of Local SWPPPs for all construction sites 1 acre and greater; and
2. The proposal for inclusion of TMDL requirements only in memoranda of understanding (MOUs) in lieu of TMDL Waste Load Allocations (WLAs) included in NPDES Permits as required by federal regulations.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Mark Pestrella
County of Los Angeles
Department of Public Works

- 2 -

July 12, 2006

And Permittees

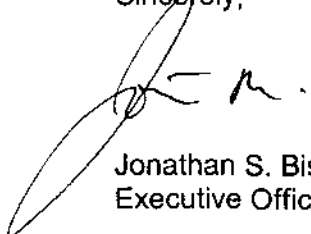
Federal Regulations (40 C.F.R. § 122.44(d)(1)(vii)(B)) require that NPDES Permits incorporate all applicable TMDL WLAs when reissued and are made enforceable. There is no existing authority to use MOUs for compliance within the NPDES regulatory scheme. Further, any dry weather WLAs are unaffected by storm water policy.

The ROWD did not satisfy the requirements in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (61 Fed Reg. 41697). For these and other deficiencies in the ROWD, we deem it incomplete.

We do however, look forward to working out these details with your staff during the MS4 permit reapplication process. Our review will not be deemed to prejudice the Board from raising additional subject matter not identified herein, during the permit reissuance process. We intend to conduct a series of work-group meetings to receive input over the coming months with Permittee representatives and interested persons, to assist us in developing permit requirements. Pursuant to 40 CFR 122.6, Order 01-182 shall remain in effect and enforceable until a replacement LA MS4 Permit is adopted by the Board.

If you have any questions, please do not hesitate to contact me at (213) 576-6605 or Dr. Xavier Swamikannu at (213) 620-2094 or Carlos Urrunaga at (213) 620-2083.

Sincerely,



Jonathan S. Bishop
Executive Officer

Enclosure

cc: Mr. Michael Levy Esq, Office of the Chief Counsel, State Water Resources Control Board
Mr. Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board
Mr. Eugene Bromley, CWA Standards and Permits, USEPA Region IX
Mr. Dan Lafferty, Watershed Mgmt. Division, Los Angeles County Dept. of Public Works

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



City of Downey

FUTURE UNLIMITED

June 12, 2006

Jonathan S. Bishop
Executive Officer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

2006 JUN 12 PM 3:11
CITY OF DOWNEY
LOS ANGELES REGION

Re: City of Downey Report of Waste Discharge (ROWD) in response to Los Angeles Regional Water Quality Control Board Order No. 01-182 (NPDES MS4 Permit).

Dear Mr. Bishop:

The City of Downey is pleased to submit the attached City of Downey Specific Report of Waste Discharge (ROWD) in response to Order No. 01-182 adopted by the Los Angeles Regional Water Quality Control Board on December 13, 2001. The National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit resulting from this order was issued to Los Angeles County Flood Control District as Principal Permittee, with the City of Downey, and 83 other municipal agencies, as Permittees. This, the 2001 MS4 permit, requires submission of this ROWD as a condition or application for a future (i.e. 2006) NPDES MS4 permit.

The City of Downey has implemented an aggressive stormwater program that is making significant and cost effective strides in meeting our shared current and future water quality goals. As you will note in the City's ROWD, the City's achievements in managing urban runoff demonstrate that Downey has taken a regional leadership role in integrated water management and protecting water quality.

The attached ROWD demonstrates Downey's commitment to continue improving water quality within our jurisdiction and the region. We encourage you to review our submission and consider what we have already accomplished, not just during this permit cycle, but by implementing BMPs that will produce dividends for decades into the future. The City of Downey has a demonstrated legacy of encouraging others to respect our regional water resources, and will continue to assist your staff, in motivating others to our shared water quality goals. If you have any outstanding questions or wish to discuss these issues further, please contact me at 562-904-7284.

Sincerely,

Gerald M. Caton
City Manager

REPORT OF WASTE DISCHARGE

**Renewal Application for the City of Downey, California
National Pollutant Discharge Elimination System (NPDES)
Municipal Separate Storm Sewer System (MS4) Permit**

June 12, 2006

Prepared by the

**Division of Engineering
Department of Public Works
City of Downey
1111 Brookshire Avenue
Post Office Box 7016
Downey, CA 90241-7016
Telephone Number 562-904-7102
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1.0 INTRODUCTION

1.1 PURPOSE

This Report of Waste Discharge (ROWD) constitutes a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit application for renewal of the Waste Discharge Requirements (WDRs) adopted on December 13, 2001 by the Regional Water Quality Control Board, Los Angeles Region (Board) in Part 6, Section S, of Order No. 01-182 (NPDES No. CAS004001). The City of Downey is one of the Permittees identified within Order No. 01-182, which was issued to the Los Angeles County Flood Control District [the Principal Permittee], the County of Los Angeles, and incorporated Cities within southern Los Angeles County, except the Cities of Long Beach and Avalon. While the Los Angeles County ROWD integrates the activities and programs implemented by all of the Permittees identified within Order No. 01-182, this Downey ROWD focuses on local programs and proposed terms for a City of Downey NPDES MS4 Permit. The city of Downey is unique in being quartered between four distinctly different hydrologic watershed units, and having its own municipal water supply, water conservation, runoff water quality protection, and enforcement programs, warranting issuance of a jurisdictionally distinct MS4 Permit.

This ROWD emphasizes Best Management Practices ("BMPs"), in lieu of strict numeric limits as was first proposed by the United States Environmental Protection Agency ("EPA"): "EPA expects that most WQBELs for NPDES-regulated municipal storm water discharges will be in the form of BMP's and that numeric limits will only be used in rare instances." (US. EPA Memorandum of November 22, 2002, from Robert Wayland, Director of Wetlands, Oceans and Watershed & James Hanlon, Office of Wastewater Management, EPA Headquarters, to all Water Division Managers – Regions 1-10). This BMP approach recognizes that the City of Downey has limited financial, technical and scientific resources to apply toward ineffective pollution source control programs. It also recognizes the rudimentary level of understanding regarding the cost and pollution control effectiveness of BMPs. For example, Caltrans' "peer reviewed" studies indicate that the recent structural BMPs, such as the sand-filters identified in the Los Angeles River Metals TMDL, do not reduce the concentration of metals in surface waters, below California Toxic Rule (CTR) levels. Clearly additional investments in studies, design, construction and testing of the iterative BMPs process are warranted.

Following the issuance of Order No. 01-182, numerous Permittees, including the City of Downey, filed legal challenges to many of the terms and provisions of that order, as well as to the procedure, review, and approval process followed by the Board in adopting it. These legal challenges remain pending before the Court of Appeal of the State of California, Second Appellate District, as Appellate Court Case No. B184034.¹

¹ The following Permittees are appellants and continue to challenge many of the provisions in Order No. 01-182: The Cities of Arcadia, Artesia, Bellflower, Beverly Hills, Carson, Cerritos, Claremont, Commerce, Covina, Diamond Bar, Downey, Gardena, Hawaiian Gardens, Industry, Irwindale, La Mirada, Lawndale, Monrovia, Norwalk,

In recognition of the accelerating environmental significance of the 2001 WDRs and the Board's apparent intent to incorporate numeric objectives into future MS4 Permits, the City of Downey requests that before the City or County ROWD becomes the basis for issuance of new WDRs or Permit, the Regional Board and State Water Resources Control Board (State Board) first take all actions required to comply with the California Environmental Quality Act ("CEQA"). In particular, recognizing that any exemption provided under California Water Code section 13389 is limited to only CEQA Chapter 3. Moreover, there exists no CEQA exemption for State and Regional Board imposed permit requirements that go beyond federal law as set forth under the Clean Water Act. Compliance with CEQA requirements, prior to the issuance of a new municipal permit, is essential in order that feasible alternatives to potentially-significant environmentally-adverse permit terms can be evaluated and unavoidable adverse impacts resulting from the project (i.e. WDRs and MS4 permit) be evaluated and properly mitigated.

The City of Downey further asserts that Order No. 01-182 amounts to the imposition of an unfunded mandate and thus requests that any programs mandated under any new MS4 permits only be imposed, where the prohibiting unfunded mandate requirements of the California Constitution, have been fully complied with.

Since the Regional Board does not have State-wide jurisdiction, it also does not solely have the authority to issue an NPDES MS4 permit under the Clean Water Act. Therefore, the City of Downey requests that any NPDES MS4 permit, under which the City of Downey is a permittee, be issued only after it has been reviewed and formally approved by the State Water Resources Control Board ("State Board").

The City is submitting the Downey ROWD with the understanding that it is not waiving any rights, objections or challenges previously brought, or which may arise, in connection with the issuance of Order No. 01-182, or any other related objections and challenges that may have been brought by the City in regards to other water quality orders, directives or regulations. This ROWD is also submitted with the understanding that the City is not waiving or relinquishing any rights it already has, or may have, in connection with any new permit to be issued in replacement of Order No. 01-182. The City of Downey reserves the right to object to the terms, or modification of terms, of previous, current and future NPDES MS4 Permit, not addressed in this ROWD and the contents herein, do not constitute a waiver of the right to challenge objectionable terms

1.2 REGULATORY BACKGROUND

The 1972 Clean Water Act (CWA) established the NPDES Permit program to regulate the discharge of pollutants from point sources to waters of the United States. In response to the 1987 CWA amendments, the United States Environmental Protection Agency (USEPA) developed the 1990 Phase I NPDES Stormwater Program, which

Paramount, Pico Rivera, Rancho Palos Verdes, Rosemead, Santa Clarita, Santa Fe Springs, Signal Hill, South Pasadena, Torrance, Vernon, Walnut, West Covina, Westlake Village, Whittier, and the County of Los Angeles and the Los Angeles County Flood Control District.

established a framework for regulating urban stormwater runoff. The Phase I program addressed sources of stormwater runoff with the greatest potential to negatively impact water quality and required NPDES Permit coverage for stormwater discharges from:

- Municipal separate storm sewer systems (MS4) serving populations of 100,000 or more; and
- Companies that fall within eleven industrial activity categories, including construction activities that disturb five or more acres of land.

Phase I MS4 Operators were required to obtain NPDES Permit coverage for stormwater discharges under their control. The most significant requirement was development of a proposed stormwater management program that would meet the maximum extent practicable (MEP) standard for reducing the discharge of pollutants from the MS4.

1.3 OBJECTIVES

The objective of this City of Downey ROWD is to develop a specific MS4 Permit that focuses on the CWA goal of "reducing pollutants to the MEP" while taking into account:

- Feasibility of implementation measures, based on available resources;
- Cost, effectiveness, and dependability of those implementation measures;
- Overall water quality improvements and elimination of impairments;
- Improving regional Stormwater Quality Management Programs (SQMP);
- Considered suggestions and approaches to improve water quality;
- Integration with other impaired receiving water body specific programs.

With the Board having recently proposed to reopen the 2001 MS4 Permit to insert numeric indicator bacteria standards, when these microorganisms are known to replicate within the drainage system, the City of Downey ROWD is focus on controlling runoff discharges to the MEP; especially in city owned and maintained MS4 elements. Based on this nexus, the City of Downey has invested significant effort in identifying and distinguishing between state, county, city and privately owned and maintained elements of the drainage system. While our effort is not yet complete, due in part to outstanding contractual disputes, we have determined that most of the catch basins and underground drainage systems elements within our jurisdiction are owned and operated by Los Angeles County. While the City of Downey will continue to assist other agencies in reducing runoff generation to all MS4 drainage elements, based on the regulatory approach now being identified by the Board, it is our interpretation that that the most effective point of pollutant source control will be at the point of discharge, which is for the most part under the control (i.e. ownership and management) of other agencies.

1.4 PROGRAM DESCRIPTION

On December 13, 2001, the Regional Board adopted Order No. 01-182, which designates the Los Angeles County Flood Control District as the Principal Permittee, while the City of Downey, County of Los Angeles, and 83 other incorporated Cities are delegated Permittees. The Los Angeles County MS4 Permit for stormwater and urban runoff assigns the responsibility for coordinating and facilitating permit compliance

activities to the Principal Permittee, but not responsibility for ensuring permittee compliance. As previously indicated, many parts of Order No. 01-182 have been challenged in a lawsuit filed in Los Angeles County Superior Court by a number of the Permittees thereunder. This legal challenge remains pending on appeal, in the Court of Appeal of the State of California, Second Appellate District, Case No. B184034.

In the 2001 MS4 Permit, the Regional Board laid the foundation of implementing future watershed based management approaches to regional water quality protection. Since the City of Downey is nearly equally split between the Los Angeles and San Gabriel Rivers Watershed Management Areas, the City has contributed to the implementation of this philosophy by actively participating on both Water Management Area Committees, the county-wide NPDES MS4 Permit Executive Advisory Committee (EAC), and several other watershed efforts (e.g. watershed specific management and monitoring plans).

2.0 APPLICANT INFORMATION

The City of Downey primarily manages the Los Angeles County MS4 Permit through the Administrative and Engineering Divisions, of the Department of Public Works. The Program Administrative contact is Desi Alvarez, Director of Public Works, the Program Coordinator is Gerry Greene, Senior Civil Engineer and Water Resources Control Specialist, the Public Education Coordinator is Carol Rowland, Administrative Assistant and Keep Downey Beautiful Coordinator. These individuals can be directly contacted through telephone number 562-904-7102, facsimile number 562-904-7296, or by writing to the Department of Public Works, P.O. Box 7016, Downey, CA 90241-7016.

The official mean elevation of the City of Downey is about 117' above mean sea level (AMSL), but ranges from about 140' in the North to less than 80' in the South. At 12.56 square miles in area, the city is primarily situated on alluvial soils of mostly sandy silts with some clay lenses. As shown in Figure 1, about 5.59 and 6.97 square miles of the total City of Downey area are located in the Los Angeles and San Gabriel River Watersheds respectively. With the exception of some of the smaller drainage areas, most of the sub watersheds within the City of Downey are owned and maintained by either the County of Los Angeles or the California Department of Transportation. In some instances, short lengths of City owned drainage systems discharge in the County owned and maintained system, which may result in additional interagency discussion about proportioning of responsibility between the two MS4 operators.

Within the Los Angeles River Watershed, the most northwesterly quarter (3.40 square miles) of the City drains to Reach 1 of the Rio Hondo (A small landscaped area operated by the Los Angeles County Flood Control District appears to drain to the lowest portion of Rio Hondo Reach 2, but the irrigation system is vandalized inoperable and no dry-weather discharges have been recently observed from the area). The southwesterly 2.35 square miles of Downey drains to Reach 2 of the Los Angeles River, with Firestone Boulevard and the adjacent rail line demarcating the grade break between drainages. In this area, the Rio Hondo and Los Angeles Rivers are both concrete lined trapezoidal channels; however the former is flat bottom with very little flow, while the Los Angeles River has a center low flow channel to convey treated wastewater flows from upper watershed areas. The Rio Hondo confluence with the Los Angeles River is located just North of Imperial Highway in the City of South Gate.

Within the San Gabriel River watershed, the northeasterly 1.38 square miles of the City, drains to the rip rap lined, soft-bottom Reach 2 of the San Gabriel River, which contains and infiltrates dry weather and most storm flows behind inflatable rubber dams. Most areas South of Florence Boulevard (5.43 square miles), including the most commercial and industrial portions of Downey, drain to Reach 1 of the San Gabriel River which is characterized by an effluent-conveying, low flow channel within a concrete-lined trapezoidal channel.

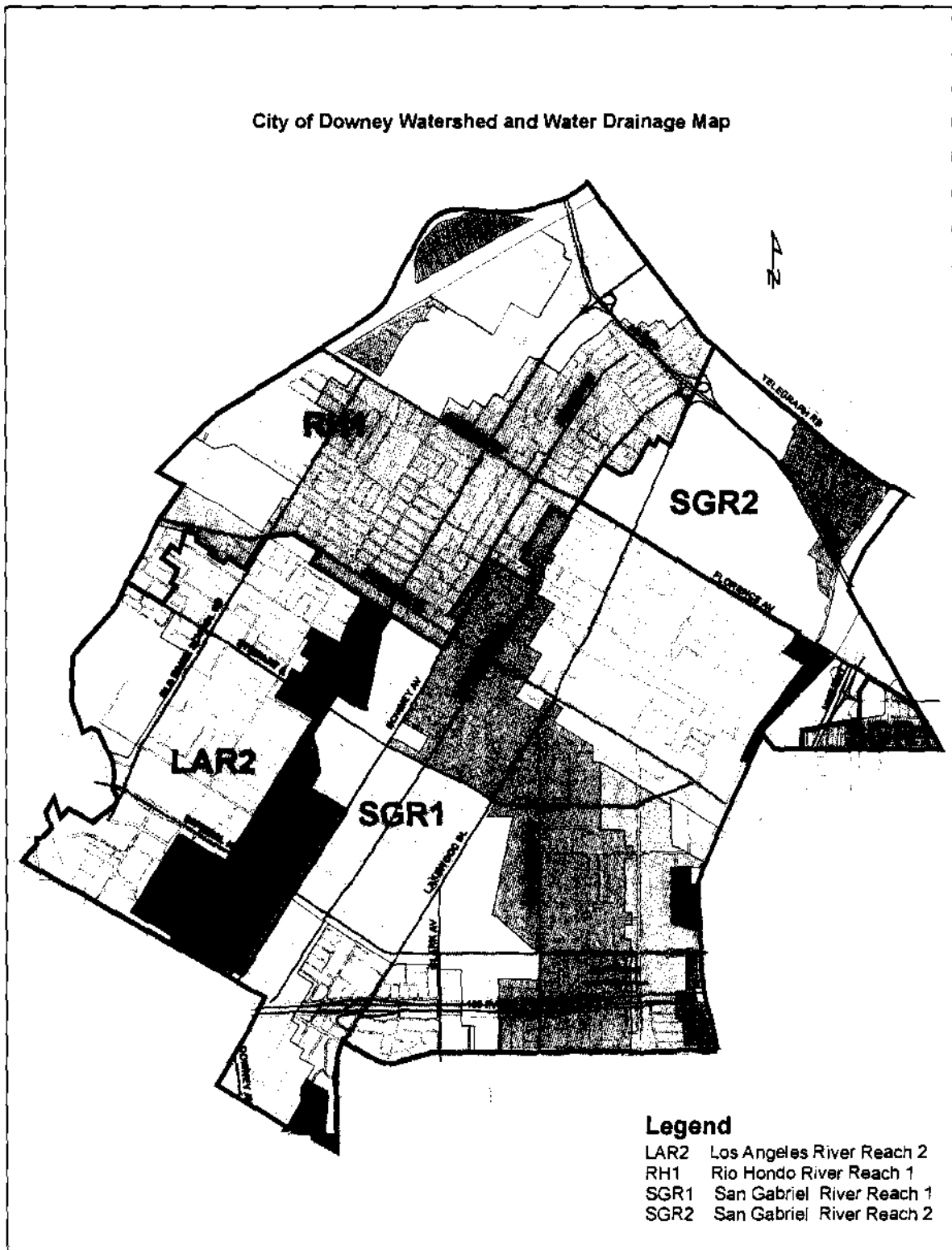


Figure 1. City of Downey Watershed and Stormwater Drainage Area Map.

During the 2000 Census, the mostly residential population was estimated at 107,323, and based on past growth is likely to reach 120,000 by early 2007. At the last census, there were 34,759 housing units, but this figure has probably risen above 35,000, due to infill redevelopment resulting from lot splits and the construction of higher density residential units. At the last census, 2,400 businesses were identified in the City of Downey; however, partially in response to permit required changes to the business license database, over 3,600 businesses were listed during the first quarter of 2006.

Groundwater elevations vary annually and seasonally, but are generally forty feet or more below ground surface. Potable water is supplied entirely by local groundwater. The City of Downey Utility Division supplies potable water and operates the city sewage collection system. The County Sanitation Districts of Los Angeles County operate a series of trunk sewers that accept wastewater from the Downey owned and operated collection system and convey it to Sanitation District treatment plants. Stormwater is collected in a series of drainage inlets, catch basins, and drains, most of which are owned and maintained by the Los Angeles County Flood Control District. Operation and maintenance of the city owned and operated portions of the drainage system is funded from the City of Downey General Fund and must compete with other public services such as the Police and Fire Departments, Parks, and Community Services for scarce fiscal resources.

Although the frequently changing level of intra-city and interdepartmental cooperation and contribution of effort make estimating MS4 Permit program related expenditures difficult or impossible to fully quantify, identifiable expenditures have increased from an estimated \$715,000 in 2001-02 to \$1,165,000 in 2004-05; a 63% increase over only 3 years and much greater than the growth in the general fund during the same period. The unfunded NPDES MS4 Permit mandates continue to impact the provision and supply of other municipal services, leading the City of Downey to seek additional support from the State Board for General Industrial and Construction Inspections and other Board mandated program requirements.

3.0 2001 NPDES MS4 PERMIT PROGRAM ACCOMPLISHMENTS

The 2001 Los Angeles County NPDES Municipal Stormwater Permit contained implementation requirements for Discharge Prohibitions, Receiving Water Limitations, Storm Water Quality Management Program Implementation, Special Provisions, Definitions, and Standard Provisions. Some of these requirements are new and were imposed on the Permittees by the Regional Board, while others have evolved over multiple permit cycles based partially on Permittee implementation experience. The MS4 permit prohibitions and limitations have been observed and implemented to the MEP standard of compliance; however, many of the Permit terms remain subject to challenge or interpretation through the pending legal challenge to Order No. 01-182.

As an individual Permittee, the City of Downey program met and often exceeded the implementation provisions of the Permit, but continued progress requires an adaptive integrated approach that's strategic, beneficial, measurable, and very cost-effective.

3.1 STORMWATER QUALITY MANAGEMENT PROGRAM (SQMP)

The City of Downey would like to gratefully acknowledge the significant efforts of the Los Angeles County Department of Public Works (LACDPW) in implementing the Countywide Monitoring Program including evaluation, assessment, and synthesis of the data that went in to the Monitoring Report which was submitted by August 15th of each year from 1994 to 2005. The County also installed channel nets and catch basin inserts and excluders, in their facilities to reduce the discharge of trash and other pollutants from their portion of the regional MS4. As Principal Permittee, it also authored the Integrated Receiving Water Impacts Report that was submitted on August 15, 2005, coordinated the collection, processing, and submittal of annual reports to the Regional Board, and developed the County-wide digital report submission format.

As a general requirement, the City of Downey implemented the components of the Los Angeles County SQMP to reduce the MS4 discharge of pollutants to the MEP. Since the Regional Board has identified each adjacent river reach as being impaired for multiple pollutants (e.g. trash, nutrients, indicator bacteria, metals, and toxicity), the City of Downey has implemented an aggressive development planning program to reduce the current and future discharge volume and mass emission of pollutants to local receiving waters. Based on the limited nationwide experience in identifying MEP-compliant best management practices (BMPs), and even more constrained fiscal resources, the City of Downey has made a good faith effort to require and implement the most effective combination for stormwater and urban runoff and pollution source controls. The City of Downey further encourages the Regional Board to adopt and endorse the adequacy of the February 2, 2004 Draft Technical Manual for Stormwater BMPs in Los Angeles County, so that another valuable tool would become available to our residents, developers, and businesses.

On February 11, 2003 the City of Downey, City Council unanimously adopted Ordinance 1142, completely revising Article 5, Chapter 7 of the City of Downey Municipal Code (DMC) and granting staff the legal authority to prohibit nonstormwater discharges to the storm drain system, as mandated through the 2001 MS4 Permit. Ordinance 1142, replaced the antiquated stormwater ordinances 1036, 1095, and 1130, which had been adopted in response to prior NPDES MS4 permit requirements, but contained conflicting water quality protection requirements. The entire DMC is available at www.downeyca.org/city_clrk_municode.php or can be located within Quick Links portion of the City website www.downeyca.org. Ordinance 1142 has been directly sent to dozens of other cities, developers, consultants and violators in association with our city stormwater program development, construction and enforcement activities.

3.2 PUBLIC INFORMATION AND PARTICIPATION

The City of Downey has actively attended and participated in the Los Angeles County Public Information and Participation Program (PIPP), including donations of \$2,000 during both 2004-5 and 2005-6. Furthermore we have reviewed draft materials for both County and State agencies so that the resulting public education materials more closely follows the intent goals of the complex regional water quality program. City of Downey staff have also made dozens of presentations to various stakeholder groups including other Watershed Management Committees, the California Water Environment Association, the Southern California Association of Governments (SCAG) Water Policy Task Force (WPTF) and, at the request of Board staff, to School District Personnel at the Los Angeles County Board of Education on May 1, 2006. While we acknowledge and share in the successes of the County Program elements identified in the County ROWD, we have continued and upgraded our own public education programs including the long standing Keep Downey Beautiful (KDB) Campaign.

In 1977, members of the Citizens' Health and Environmental Sanitation Committee (CHESC) initiated the KDB program with the goal of keeping Downey clean and safe through litter control and promoting public interest in improving the City. Since 2001, KDB has used the Litter Index (LI) method developed by Keep America Beautiful (KAB) to quantify litter control efforts, make the litter prevention work easier and reporting results credible. The annual LI is undertaken by a team of at least four scorers who visit 5 subareas, selected as a fair representation of the land uses within each City of Downey Council District. Using a four point scoring system where 1 indicates no litter observed, the sub-areas were rated and the data collected and averaged to obtain area scores. Based on the results of the LI, KDB conducts and monitors progress from monthly cleanups in the most littered areas and City-wide clean ups in the Fall and Spring. City wide cleanups consist of litter abatement, graffiti control, and planting at designated areas. KDB also assists with an average of seven community service projects per year (referred to locally as custom cleanups) and in September 2005 the Heal the Bay inland site clean up. These volunteer efforts begin with brief presentation regarding the cause and effects litter on the community and watersheds.

- **KDB averages 20 cleanups per year and over 5 tons of trash collected.**

KDB also has an after school educational and community outreach program that since 2001 has emphasized environment protection and storm water pollution prevention and annually reaches over 600 elementary and middle school youths. KDB uses a variety of educational materials including videos such as the *Synthetic Sea*, *Don't Trash California*, and *Waste in Place*. The KAB curriculum is aimed at making students more aware of the source, characteristics and disposal options for municipal solid wastes. Unsworth Elementary School recently received a grand prize award of \$1,500 in the Wal-Mart Kids Recycling Challenge by collecting 2,768 pounds of shopping bags, nearly a third of what was collectively recycled by 37 comparable Los Angeles areas schools.

KDB sponsors a booth at the annual Downey City Street Faire and, along with public educational brochures, such as "Don't Trash California" and promotional items, this year distributed a test called "*What Goes in the Storm Drain?*". At the May 13, 2006 Kid's Day event, KDB sponsored an Environmental booth and used the Los Angeles County Enviroscape model which emphasizes runoff transport and pollutants source controls.

In addition to KDB, the City of Downey Department of Public Works coordinates:

- A quarterly newspaper format newsletter, entitled *One Person's Trash* is mailed to all City of Downey residents and businesses. The front page is devoted to City specific issues such as litter prevention, used oil recycling, pollution source control, storm water and urban runoff pollution prevention, while interior pages consists of national environmentally themed articles.
- A water quality protection themed coloring contest for elementary school artists. The winners are acknowledged during a City Council meeting and the art itself used in preparing the following year's City published calendar. Three thousand 2006 calendars were printed with funding from the California Integrated Waste Management Board and 15 local business sponsors and included the name, addresses, phone numbers and a map to locate the 12 used oil and 6 oil filter recyclers in the City of Downey.
- During the annual Street Faire event, City of Downey Public Works staff hand out BMP related brochures, stickers with contact numbers for City Services, and educate residents about the municipal drainage system.

During the current Permit period, City of Downey Staff sponsored or made several professional presentations per year regarding stormwater issues, BMP applications and the challenges of TMDL implementation. During the last quarter these included:

- On February 28, 2006, the City Stormwater Coordinator was the Storm Water Programs Issues Session Chair at the California Water Environment Association (CWEA) Pretreatment, Pollution Prevention and Stormwater (P³S) Committee meetings in Burbank.
- March 9, 2006 presentation to the Southern California Association of Governments (SCAG) Water Policy Task Force (WPTF) entitled *Downey's*

BMP Strategy for Managing Stormwater Runoff: What Do the MS4 Permit Annual Reports Tell Us About BMPs?

- An April 7, 2006 Panel Session presentation entitled *Numeric TMDLs and Municipalities: Are the Science, Regulations, BMPs, Money, or Political-will there yet?* at the 78th CWEA Conference in Sacramento.
- On May 1, 2006 assisted Regional Board MS4 Permit Staff by making a presentation on Infiltration BMPs to Los Angeles County School Districts.
- A May 25, 2006 presentation on *BMPs for Public Works Projects* for the Orange County General MS4 Permittee Meeting.

The City of Downey recommends deleting from the PIPP is the effort to hold workshops to educate corporate managers of restaurants and gas station chain. Despite the commendable effort of the County and their consultants, after sending out thousands of invitations, 10 BMP workshops attracted only 145 managers and staff. At the February 22, 2006 workshop held in Lakewood at the behest of the Cities of Cerritos, Downey, Lakewood, and La Mirada, and despite sending out over 500 hundred invitation letters (along with a hundred direct letters regarding unsatisfactory DHS restaurant inspections in the City of Downey) with a follow up reminder phone call, less than a dozen participants attended. This was a regrettable and significant waste of scarce municipal resources, which appears to have been repeatedly observed.

The City of Downey managed and provided matching funds, along with Los Angeles County, several other Permittees, and the USEPA, for a Coalition for Environmental Protection Restoration and Development (CEPRD) study entitled *Market-Based Strategies for Reducing Trash Loading to Los Angeles Area Watersheds*. We hope to continue this effort during the next year with either a follow up study or the analysis and installation of a trash collecting system in conjunction with several upper Los Angeles River Watershed cities (pending further project regulatory approvals).

During the next MS4 Permit cycle, the City of Downey intends to continue participating in, and supporting, the Los Angeles County on the Public Information and Participation Program, while emphasizing our current highly successful City based effort. We will track the Los Angeles County proposed social marketing theory effort to determine if it achieves the desired behavioral changes in areas comparable to the demographic characteristics observed in the City of Downey. However it is also important to note that our existing program has made a clearly demonstrable impact on our community and does not require the same level of Regional Board oversight that other areas might.

3.3 INDUSTRIAL/COMMERCIAL FACILITIES CONTROL

As noted in our annual MS4 Permit reports, implementation of the industrial and commercial source control program, within the City of Downey, has been inconsistent due to both inter- and intra-agency challenges and our current greater emphasis on enforcement, public education, development, and construction program efforts. However progress was made in implementing all aspects of this program.

Within the City of Downey implementation of this program was initially separated into 4 tasks: 1) Database Development; 2) Restaurant Source Inspections; 3) General Industrial Activity Stormwater Permit (GIASP) Inspections, and 4) Other Critical Source Inspections. Due in part, to the challenges observed in implementing these tasks, we have also instituted a fifth task to identify businesses that are operating without the appropriate business license; however supplies needed to better implement all of these task efforts only recently became available and scheduling conflicts during the remaining period term suggest that it is unlikely to be fully implemented by late 2006.

Under the 2001 Permit, the City of Downey was to develop and maintain a database for facilities within our jurisdiction identified as critical sources of stormwater pollution. The types of "critical sources" tracked as a result of the 2001 Permit are summarized below:

- Restaurants;
- Automotive service facilities;
- Retail gasoline outlets (RGO's) and automotive dealerships;
- U.S. EPA Phase I Facilities (Tier 1 and 2);
- Federally-mandated [40 CFR 122.26(d)(2)(iv)(C)] Facilities;
- Municipal landfills;
- Hazardous waste treatment, disposal, and recovery facilities;
- Facilities subject to SARA Title III (also known as EPCRA).

The critical source information that is now being collected and regularly updated by the City of Downey includes the following information about each identified industrial and commercial facility:

- Name of facility and name of owner/operator;
- Address of facility and operator;
- Coverage under the GIASP or other individual or general NPDES permits;
- An SIC related code that reflects the activities or products at each facility.

In 2002, when the MS4 Permit requirements were first shared with the City of Downey Finance Department, they opined that our proprietary software included the necessary data. In 2003, when an ASCII file of the data was finally made available, the 4-digit industry codes was found to not be based on SIC and a wide variety of business types were spread among a few dozen codes. Due to recognized SIC limitations and NAFTA non-compliance, the City of Downey moved to implement the 6-digit North American Industrial Classification System (NAICS), but was delayed by a repeatedly extended 8 month backorder on deliveries from the National Technical Information Service (NTIS). The NAICS codes were first employed during late 2004, for the 2005 Business License Renewal effort, but by mid 2005 it was clear that about half of the designations were made by a Cashier (no longer employed by the City), who neither sought help from engineering, nor made a considered use of the common NAICS codes provided to her. Our correction effort has continued into the second quarter of 2006, but since few businesses are aware of either the SIC or NAICS codes, a significant portion of the effort is expended in correcting invalid and sometimes deceptively selected codes.

In late 2003, while waiting for the back ordered NTIS discs, the city focused on the MS4 Permit Restaurant Inspection requirement by contracting with the Los Angeles County Department of Health Services (DHS) to conduct the inspections. The DHS list of restaurants was compared with the City of Downey Business License database and found to include about 30% more records than the city license data file. The city promptly initiated an effort to bring these new businesses into licensing compliance. The DHS inspections formally began in December 2003 and have continued since then, with the two inspections per permit cycle expected to be completed by the end of 2006.

While the City of Downey Business License list expanded considerably through comparison with the DHS list, there is no comparable master list for the City automotive industry and the 2004-05 inspection effort was significantly frustrated by business licenses not in the database, licensed businesses that were closed during business hours, invalid business names, and addresses. Following the previously alluded to 2006 Business License database correction effort, a laptop has been purchased for the Stormwater Coordinator and will hopefully reduce the challenges observed during the previous inspection cycle. Despite these challenges, Code Enforcement and Public Works have continued to respond to complaints of Illicit Discharges and have both educated and initiated enforcement for the following MS4 permit violations:

- Improper oil and grease disposal;
- Trash bins open, loose trash in the bin area, illegal bin area washout;
- Illicit wash water discharges (e.g. floormats, filters or garbage containers);
- Improper/infrequent removal of food waste and rubbish from parking area;
- Evidence of excessive staining, food wastes, or excessive wash down;
- Lack of housekeeping BMPs to prevent spills and leaks;
- Improper discharge of wastewaters or non-stormwater drainage;
- Improper raw, waste or hazardous materials disposal;
- Improper exposure of work and storage areas to rainfall and runoff;
- Improper maintenance of privately owned drainage inlets on the facility;
- Lack of employee stormwater pollution prevention training re-enforcement;
- Lack of fuel-dispensing area maintenance and spill or leak controls;
- Improper washdown of facility areas and facilities to the MS4;
- Lack of appropriate BMPs to mitigate pollutant source design flaws;
- Lack of annual on-site drainage inlet maintenance, prior to October first;
- Lack of fueling station signage about "topping off";
- Lack of automatic shut-off dispenser nozzles;
- Excessive spill, staining or failure to use watertight waste receptacles;
- Improper employee training regarding hazardous materials and wastes;
- GIASP identified facilities must have a current WDID and active SWPPP.

The City of Downey did not explicitly track GIASP coverage status, choosing to annually compare the subset of the GIASP requiring City of Downey Business Licenses (based on industry code) to the state maintained list of GIASP Permittees. Nineteen (two incorrectly identified as being in Downey) facilities were identified in June of 2002. Since then, three facilities ceased operation, one corrected its address, three joined the GIASP permit without municipal action, and six have been directed (one in May 2006),

by the City, to obtain coverage. Currently there are 23 GIASP Permittees listed in the City of Downey; however one is physically on the South Gate side of our City boundary. Efforts to complete the GIASP inspections have been frustrated by conflicting information supplied by Industrial Permittees in early 2005, indicating that they had already had a state inspection, the slow posting of state inspections, indicating that the site had actually not been inspected, and various challenges with SIC and NAICS codes. A more skeptical inspection effort is planned for the summer of 2006.

As indicated above, and by the Principal Permittee, municipal Permittees found it impossible to schedule GIASP inspections based on the lack of timely information regarding planned or completed state inspections on the Board website (see link: www.waterboards.ca.gov/rwgcb4/html/programs/stormwater/swindustrial/inspections.html). While overlapping inspections resulted in additional BMP attention at critical source facilities, the acknowledged resource limitations of both state and local agencies, demands that more specific and complete information be available from the Regional Board, during future Permit cycles, to avoid redundant efforts. Until that time the critical source program should be curtailed or focused on more significant pollutant sources. Despite these challenges, the City promptly responds to complaint calls and refers firms to the Board to obtain, or settle disputes regarding inclusion under, the industrial permit.

The City of Downey Critical Source Control Program was designed to meet the objectives of the 2001 NPDES Permit. Some of the select accomplishments of our staff related to the 2001 Permit include:

- One fourth of the 24 GIASP Permittees currently in the City of Downey, were directed into the program through the efforts of City Staff;
- Downey Restaurant Critical Source Inspections have located and eliminated both illicit connections and illegal discharges, many of which have been previously reported to the Regional Board by letter;
- Downey Automotive Critical Source Inspections have eliminated both illicit connections and illegal discharges, many of which have been previously reported to the Regional Board by letter;
- Downey has converted to the NAICS classification system, which is more precise and avoids spurious inappropriate critical source listing (e.g. coin laundromats and dry-cleaners) that exist in the 2001 MS4 permit;
- Downey has taken the initiative to identify and license, businesses that were unlicensed in 2001, prioritizing small automotive repair facilities;
- Based on an Industrial Wastewater Permit termination, City and Regional Board staff cooperated in forcing an owner to obtain a NOT for their site;
- While the 2000 census reported 2,400 Downey businesses, partially due to our MS4 Permit efforts, that figure now exceeds 3,600 (most of which are not critical pollutant source business types).

The Industrial/Commercial Facilities Control Program remains subject to legal challenge, and is a program which the City of Downey does not intend to continue under the renewed permit. Any inspection obligations, that exceed federal regulations, constitute a State mandate and should be funded by the Board in accordance with the

precepts set forth in Article XIII, section 6 of the California Constitution. The Board shall consider the economic impacts of mandating Permit requirements that exceed federal regulations. The federal regulations only require Permittees to have a program to monitor and control pollutants in stormwater discharges from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and industrial facilities that the municipalities determine are contributing a substantial pollutant loading to the MS4. The City therefore objects to any additional requirements being included in the renewed Permit without compensatory support.

3.4 DEVELOPMENT PLANNING

The City of Downey has generally emphasized infiltration as a decentralized response to the unfunded MS4 Permit mandate and the City Planning Department typically refers most building projects to the Public Works Department for review. With the exception of the 160 acre NASA Boeing redevelopment, most projects fall planning into one of four categories: 1) Single family Residential; 2) Non-SUSMP; 3) SUSMP; and 4) GCASP.

Small residential construction and addition projects of 400 square feet or more typically submit the square footage of their new impervious structures and can either submit an infiltration design of their own, or adopt a "standard" device configuration that is available from the Engineering Department. While other watersheds are moving toward a ¼ to 1/2 inch retention design, the City of Downey has retained the SUSMP 0.75" design criteria for sizing infiltration devices, and configures them to utilize inlets under downspouts or trench drains to intercept general site flows and convey them to a stand alone infiltration unit available from a local vendor. Although the infiltration volume is based on the area of the additional impervious surfaces, the inlet is often placed to maximize whole site flow interception and "mitigate" more surface area than just the addition. Since these devices do not connect directly to building elements and are quite rudimentary to install, the infiltration unit may be sketched or simply attached and referenced on the construction drawings. Once approved, the parcel location and device are recorded in the City of Downey GIS system. No maintenance agreements or covenants accompany these installations, which cost between five hundred and a few thousand dollars each. These residential redevelopment requirements are identified as needed to address regional water quality protection and runoff reduction initiatives.

Larger, non-SUSMP projects, typically receive a focused Engineering Division review of their plan submittal, to insure that 0.75" design criteria is correctly calculated and that a landscaped area is included immediately upstream of the infiltration unit inlet whenever possible. Those projects that increase site imperviousness over the existing condition are required to provide peak flow detention capacity. The plans must include a list of standard erosion control measures to be in place during construction. Projects that might shift to the SUSMP category based on unexpected demolition (e.g. parking lot replacement), are cautioned that prior stop work orders have resulted in construction delays of 1 to 6 months, with significantly higher costs for SUSMP review and approval.

Projects that might require SUSMP preparation are typically conditioned on meeting applicable Water Board imposed requirements and the proponents are encouraged to meet with the City Stormwater Coordinator at the earliest stage of the development process. Projects that increase the amount of impervious area following redevelopment are generally required to file a more rigorous SUSMP that includes peak flow detention design considerations. Typically City of Downey SUSMP projects are designed to meet the 0.75" design standard using at minimum a combination of landscaped (bio) swales and infiltration. City Engineering staff assist developers and their design professionals in evaluating and selecting among potential BMP solutions to their development challenges. Projects in this category are required to include a BMP and erosion control plan with their plan submittals. On three occasions, Board remediation efforts and SUSMP infiltration design efforts occurred, indicative of a regulatory conflict or overlap that should be addressed. All SUSMP projects are required to file a Covenant and Agreement with the County Recorder for BMP maintenance and design conservation, prior to issuance of occupancy permits. A standard email, with hotlinks to the SUSMP guidelines and other supporting regulatory information such as the MS4 Permit and 303(d) listings, is liberally provided to developers and their consultants, even though the SUSMP provisions are being challenged by the city. Applicable projects will continue to be conditioned on meeting SUSMP requirements prior to new MS4 Permit issuance.

Redevelopment projects, over one acre in extent, are required to meet City of Downey SUSMP infiltration requirements and file a Notice of Intent (NOI) prior to issuance of a City Grading Permit. (Due to delays in Waste Discharge Identification Number issuance by the State, Downey has accepted other indicators of NOI application.) Exceptions to the normal City of Downey SUSMP and GCASP process have occurred at the Downey Landing Redevelopment Projects, which file a separate appendix to the City of Downey annual MS4 report, and at Downey Unified School District projects, due to the District's contention that the City does not have jurisdiction over their operations. In order to minimize construction phase misunderstandings, Engineering Staff pre-review project SWPPPs before construction begins, at the developer's or contractor's request. While this effort has resulted in site specific SWPPPs that include fewer generic and unused BMPs, it has not reversed the tendency for these documents to fall into disuse and be poorly maintained after the initiation of construction.

Despite the delay of Regional Board Staff in adopting the February 2, 2004 draft LACDPW technical manual for siting and design of BMPs for the development community, the City has tried to distribute and incorporate its recommendations to the developer, consultant and contractor communities. During this permit period developers in the City of Downey have incorporated into their projects: basin inserts, hydrodynamic devices, vortex separators, biofilters, on-site clarifiers, vegetative swales, perforated pipes in rock filled trenches, various infiltration systems, retention, and detention basins.

Since the development constructed today, will impact water quality forty or more years into the future, the City of Downey Development Planning Program was designed to exceed the 2001 Permit objectives. The following Figure 2 shows that through this aggressive city program, more that 550 infiltration BMP projects have been permitted and most are already constructed and operational. The accomplishments of this City

directed program are scattered nearly randomly throughout each of the adjacent watershed drainage areas and benefits the regional MS4 systems owned and operated by several agencies. Over time, this important City of Downey contribution will reduce the discharge of runoff and the indicator bacteria that current replicate in the drainage systems of these agencies. A summary of the City of Downey Development Planning program accomplishments include:

- By 2005, all single family residential redevelopments, or additions of more than 400 square feet, included a 0.75" design criteria infiltration device;
- Over 550 redevelopment projects in the City of Downey are conditioned to include BMPs; most based on infiltration of the 0.75" design criteria;
- These BMP projects have been recorded in the City GIS system and can be queried and displayed by BMP type, volume and other parameters;
- Over 1% of the City of Downey housing stock already incorporates some infiltration feature, usually sized based on the 0.75" design criteria;
- By June 1, 2006, over 1.4 million cubic feet (32 acre-feet) of infiltration storage volume, has been constructed within the City of Downey;
- Ignoring evaporation, transpiration, and over-irrigation, an average 14" storm season that is 80% retained (based on the 0.75" design criteria), could potentially infiltrate 20 million cubic feet or 500 acre feet of water;
- Based on the above assumptions, the City of Downey Integrated Water Management Effort could already be potentially infiltrating nearly 3% of our annual groundwater supplied potable demand of 17,000 acre-feet;
- A significant fraction of this same volume should be credited as the City of Downey's contribution to regional pollution source control efforts.

The City of Downey has implemented one of the most focused and aggressive Development Planning Programs in Los Angeles County. While the City intends to comply with the Standard Urban Stormwater Mitigation Plan (SUSMP) program during the duration of this permit, this element is subject to a legal challenge and the City of Downey is proposing to discontinue its application during the next MS4 permit cycle.

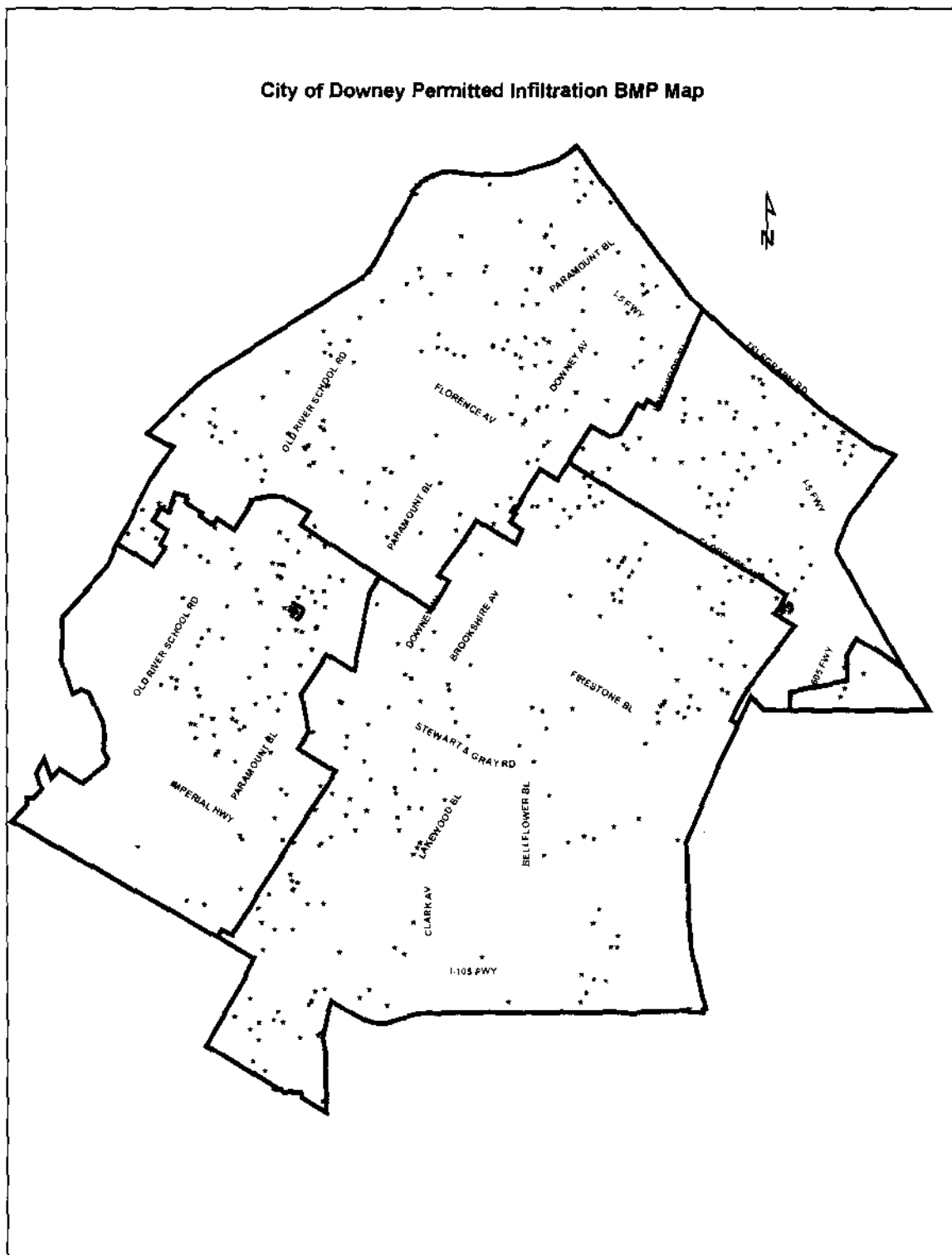


Figure 2. City of Downey Permitted Infiltration BMP Map.

3.5 DEVELOPMENT CONSTRUCTION

The Principal Permittee Development Construction Program requirements are on its website and in a Water Quality Regulations brochure which is available to the public.

The City of Downey Development Construction Program focuses on addressing runoff issues during the design phase, by developing construction site drawings that address the potential site pollution generation issues for each of the four levels identified in the Development planning section. Construction projects were adequately reviewed for compliance with NPDES Permit requirements, including development of Storm Water Pollution Prevention Plans (SWPPP) and compliance with the SUSMP requirements of the 2001 NPDES Permit. Various levels of enforcement actions were taken against construction sites found to be in violation of MS4 Permit requirements as identified through the modified Downey Municipal Code (Stormwater Ordinance 1142).

The City of Downey Building and Safety Department provides informal, but frequent, oversight of private construction projects while conducting their required structural inspections. This oversight may include informal suggestions, preventive actions, and the issuance of correction or violation notices for erosion or other pollution control failures. They also observe whether infiltration devices are installed at project sites and may suggest installation tips; however, they do not provide a formal installation inspection service since these devices are not characterized in the Building Code.

Public Works inspectors, observe and inspect projects that impact the Public Right of Way or other publicly-owned structures, such as the drainage system, including sidewalks, driveway approaches and culverts. During this activity they will also note and initiate corrective action for sediment tracking or other pollution generating activity.

Recalcitrant sites, or projects that are significant or intentional pollutant sources, are referred to Code Enforcement, the Stormwater Coordinator, or both when firm enforcement measures are potentially warranted. Referrals can be initiated by Building and Safety Inspectors, Public Works Inspectors, other municipal staff, other agency staff, and the public, including contractors and developers. Enforcement measures are proportional, progressive, and may also be forwarded for attention by Board staff. The latter is especially true for repeat offenders and specialty contractors that tend to spend little time in the City of Downey (e.g. swimming pool gunite services), but show a blatant disregard for regional water quality protection and MS4 Permit requirements.

Formal GCASP site inspections occur annually during the rainy season, however the City Stormwater Coordinator and Public Works Inspector also conduct informal Friday site visits to verify weekend BMP placement. These inspections have noted significant resistance among contractors in updating SWPPPs, but much less resistance to BMP upkeep and maintenance. While we have issued NOVs and reported technical violations to the Board for further action, our emphasis has been on controlling the discharge of construction site pollutants, especially sediments. We have also expended significant effort in persuading these sites to obtain their Notice of Termination (NOT) at project conclusion, but efforts to link issuance of Certificate of Occupancy to NOT

confirmation have been unproductive due to delays and complications in NOT processing and acceptance by the Board. Since the State Board collects fees for GCASP sites and is responsible for the discharges that emanate from them, the City of Downey proposes to eliminate inspections at these sites during the next permit cycle.

Certain aspects of this program remain subject to a legal challenge by the City of Downey, other 2001 MS4 Permittees, the Construction Industry Coalition on Water Quality ("CICWQ"), and the Building Industry Legal Defense Foundation. The challenged portions of this program are therefore not being proposed for inclusion during the next permit cycle. Inspection obligations in exceedance of federal regulations constitute a State mandate and should be funded by the Board in accordance with the precepts set forth in Article XIII, section 6 of the California Constitution, which mandate that the Board consider the economic impacts of Permit requirements which exceed federal regulations. The City of Downey reserves its objections to the broad scope of construction site inspections required by the 2001 NPDES Permit, which go beyond the requirements of federal regulations.

3.6 PUBLIC AGENCY ACTIVITIES

The Utilities Division of the City of Downey Department of Public Works maintains the City Sewer Collection System. In response to the MS4 Permit, the prior Spill Prevention Manual was significantly revised and distributed to the implementing Staff in June 2003 and subsequently to the Board. As noted in our annual reports, City Staff are constantly at work maintaining this sewer system and infrequently responding to spills, usually originating with private laterals or abandoned facilities. With the adoption of recent Sanitary Sewer Overflows Waste Discharge Requirements by the State Board, this program element is duplicative and should be discontinued from future MS4 Permits. The 2001 Permittees, in cooperation with the County Sanitation Districts of Los Angeles, completed the Treatment Feasibility Study. This study investigated the possible diversion of dry weather discharges or the use of alternative treatment control BMPs to treat flows that may impact public health and safety and/or the environment. No diversion opportunities were identified within jurisdiction of the City of Downey.

The City of Downey initiated four GCASP construction projects during the 2001 MS4 permit cycle and participated extensively in the design of a fifth for the Metropolitan Transit Authority (MTA) Division 4 Non Revenue Vehicle Maintenance Facility. Adequate SWPPPs with appropriate construction BMPs were prepared for each project. Two of these projects were for the Firestone and Lakewood Boulevard reconstruction projects, which because of traffic loading are deemed unsuitable for direct infiltration; however, as with all City of Downey streets, the gutters on these Boulevards are vacuum swept weekly to control pollutants in conformance with the Los Angeles River Metals TMDL recommendations. A grant was submitted to the Board for construction of an inverted bioswale median within Lakewood Boulevard, but was not highly prioritized by Board staff, leading the City back to utilize the original state highway cross sections. The MTA facility complied with SUSMP by utilizing two large rock filled infiltration trenches to reduce the discharge of metals to the impaired Rio Hondo Reach 1 receiving water as characterized in a two page information sheet previously forwarded

to the Board for consideration. The Rio Hondo Event Center and Golf Course exceeds SUSMP requirements by redirecting parking lot pollutants to landscaped swales, an infiltration system and the golf course water hazards, eliminating a significant parking lot pollutant source from the impaired Rio Hondo Reach 1 receiving water. The Downey (NASA) Park project is still under design, but current plans call for the conversion of a 10 acre parking lot into a municipal park that includes an innovative underground infiltration basin with 8 acre-feet of retention and detention capacity.

Storm Water Pollution Prevention Plans were prepared for both the City of Downey Utility and Maintenance Service Yards. BMPs were implemented to reduce pollutants to the MEP; however both facilities are nearing the end of their useful life and costly new structures (e.g. a fuel station canopy) have been deferred for incorporation at the proposed combined yard that is planned for construction and completion with the next three years. Portions of each existing facility are served by clarifier structures, where vehicle rinsing is allowed, while most of the solid waste and construction materials handling occur in an unpaved area where suspended solid mobilization is controlled.

As indicated in the City of Downey Annual MS4 Permit Reports, pesticides are stored in a locked portion of the Maintenance Service Yard and applied under the supervision of a State Certified Pest Applicator. Banned or unregistered pesticides were long ago purged from this locker. Pesticides and fertilizers are not applied when rain is anticipated and mulches are stored outdoors in an unpaved area that encourages infiltration. Wavelength specific light inhibitors, rather than aquatic herbicides, are used to control aquatic vegetation in ornamental city ponds and vector control of large temporary pools is managed by the Greater Los Angeles County Vector Control District.

The Operation and Management of City of Downey Storm Drain is undertaken by the Department of Public Works with maintenance by the Utilities Division. Although none of the City owned catch basins have been designated as collecting significant amounts of trash, the acknowledged city owned catch basins are cleaned twice annually. During this permit cycle, an Eagle Scout with the Boy Scouts of America and the City of Downey undertook a significant review of the drainage information in the Geographical Information System (GIS) and repainting of catch basin stencils. Many previously unrecognized catch basins and drainage systems belonging to the City, County, and Caltrans were located, while the ownership of others remains unresolved. More GIS corrections are planned at which point the city drainage map and maintenance schedules will be formally updated and available for review. City owned "channels" (often just cement lined easements at street level) are cleaned at least annually or more often if needed due to illegal dumping. All City transit stops have trash receptacles that are emptied daily. During special events, such as the Holiday (Christmas) Parade, Street Fair, and Kid's Day catch basin blocks are placed in advance and trash control initiated in conjunction with crowd dispersal; after which the blocks are removed.

During this permit cycle, the City of Downey vacuum swept all of its streets and parking lots on a weekly basis. Most streets are posted for parking enforcement on the scheduled weekday, but a few residents have opted out of this public service and are responsible for their own litter control. There also remain a small number of private

streets on which the residents are responsible for litter and dust control. Sawcutting of public streets requires an encroachment permit and a Public Works Inspector ensures that unfamiliar contractors are educated in relation to local construction practices. The Stormwater Coordinator provided MS4 Permit related training to the majority of the Public Works Utility and Maintenance Services employees during two training sessions. Code Enforcement and Building and Safety officials received similarly focused training.

There are no municipal facilities which warrant management under the GIASP program. City of Downey employees and contractors are advised that emergency repair and clean up activities should be undertaken in an environmentally friendly manner that incorporates applicable BMPs. Although the City of Downey participated and identified drains for potential inclusion in the Treatment Feasibility Study, none were of high priority or recommended for immediate implementation.

3.7 ILLICIT CONNECTIONS/ILLICIT DISCHARGES ELIMINATION

Since 2002 the City of Downey has supplied the Los Angeles County Department of Public Works with a GIS representation of the location of any observed illicit connections and illicit discharges. By the fall of 2006, City of Downey staff will have investigated over 300 reported Illicit discharges and while many events became public education opportunities, an increasing number of violation notices and a limited number of enforcement actions have resulted. The City Code Enforcement Division also maintains separate Police Department files of additional minor discharge events.. In addition, 5 illicit or undocumented connections have been terminated or permitted with the County. While we have received a few tips through the Los Angeles County Public Hotline (1-888-CLEAN-LA) the vast majority of calls are from residents to the City of Downey Department of Pubic Works, Code Enforcement or Fire Department. These three city departments cooperate in handling minor events semi-autonomously, but are mutually dependent for specific professional experience and skill sets. Furthermore, when County drainage facilities are involved, the city reports the incident to the Los Angeles County Flood Control District via their 24 hour internal hotline.

The City of Downey Utilities Department has completed the MS4 permit required field screening of all city-owned channels and is continuing to screen city storm drains as they are identified during the GIS correction effort; however it is notable that all illicit connections identified to this point, were either cryptic (e.g. unpermitted curb cores) or unpermitted extensions/connections, of private drains.

While the Los Angeles County Department of Public Works has prepared the MS4 Permit required formal analysis of the regional Illicit Discharge and Connection data accumulated from the Permittees that submitted data, the City of Downey specific data shown in Figure 3 suggests a near random pattern that is slightly weighted towards City Hall. The most common incidents are typically associated with residential remodel and repair work, including the washing down of materials and supplies or surfaces; however swimming pool discharges or construction activities and commercial auto detailing are also often observed. Illicit connections have included:

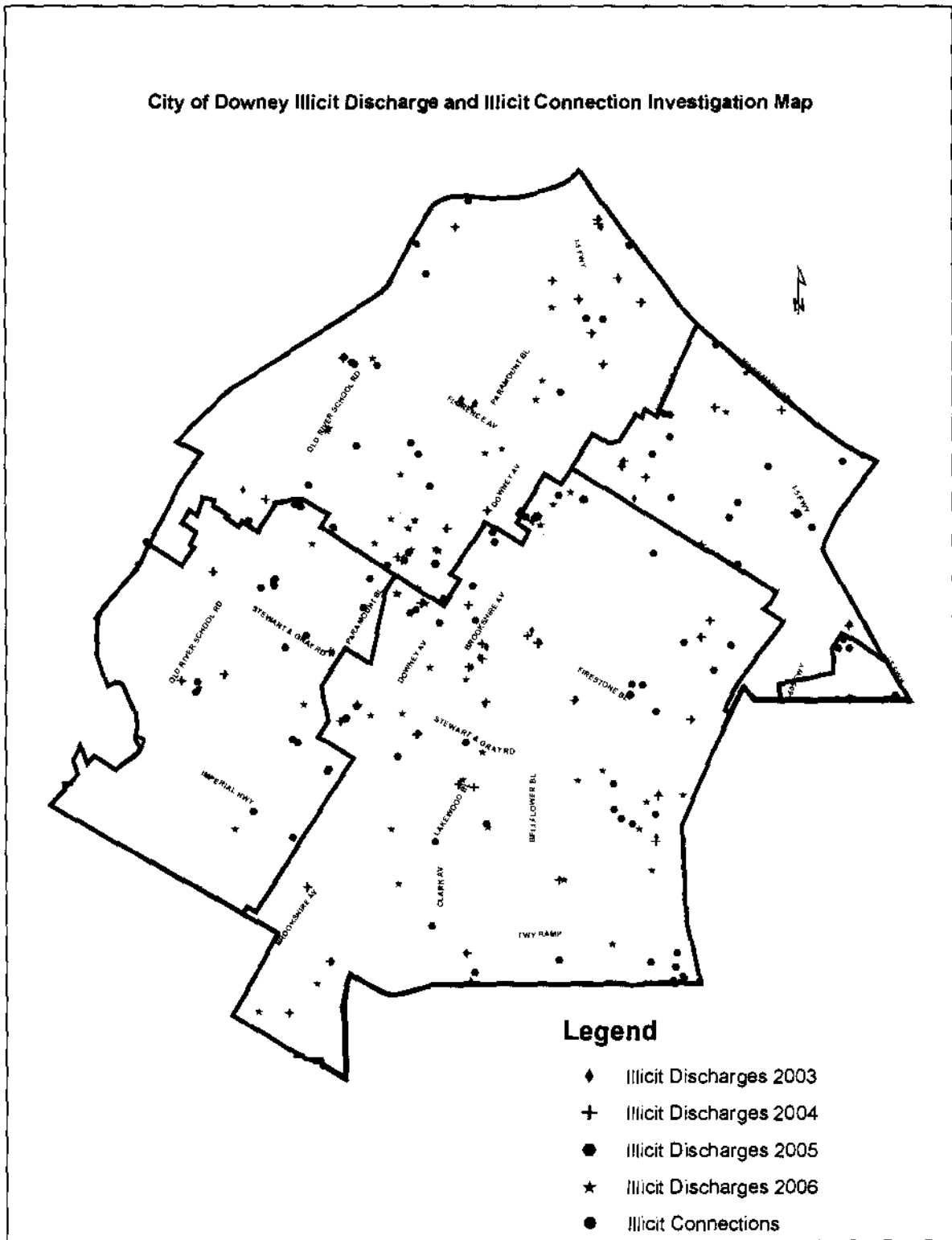


Figure 3. City of Downey Illicit Discharge and Illicit Connection Investigation Map.

- A un-permitted residential landscaping curb core
- Extension of the private drain line in auto dealership
- Washing food into a drain line at rear of a fast food restaurant
- Residential washing machine connected to a Caltrans surface drain;
- Bathroom connected to the roof drain of a multi story office building.

A significant fraction of the illicit discharges are from contractors, construction materials suppliers, auto detailers, pool and building maintenance services, many of which have neither a City of Downey Business License, nor are headquartered within the city. It is our supposition that many of these firms operate the same way throughout Los Angeles County, but are rarely in any one, actively enforcing, jurisdiction long enough to establish a pattern or modus operandi. For this reason, nearly two dozen City of Downey letters, to those businesses that blatantly ignored proper pollution source control practices, have been copied to the Board enforcement staff in anticipation that a list of these establishments might be developed and more universally addressed. As an example, developers for the McDonald's Restaurant Corporation and Jay's Gunite, were each reported to be violation of MS4 Permit requirements twice, at different projects.

4.0 PRIORITIES FOR PROGRAM IMPROVEMENT

Municipal stormwater and urban runoff management programs in the Los Angeles region were initiated with the June 18, 1990 adoption of Order No. 90-079. A revised Municipal NPDES Permit was issued in July 1996, and the current permit in December 2001 (Order No. 01-182.) The City of Downey in invigorated to have accomplished so much during the third Permit cycle, but remains frustrated by the unequal distribution of responsibilities, costs, and risk among Permittees, Regulators, and Stakeholder groups. Reflecting on the current state of affairs we conducted a review of our current management programs with an eye toward future efforts. As public agencies, all of the 2001 Permittees and Regulators have an obligation to responsibly manage public funds and protect the quality of life and environmental resources within our jurisdictions. The City of Downey has developed and implemented as outstanding program for managing stormwater and urban runoff impacts in a cost effective manner, that is commensurate with the Maximum Extent Practicable (MEP) standard and regional best interests.

As summarized, the City of Downey has an aggressive water quality program that:

- Supports both local and regional public education efforts;
- Has investigated over 300 illicit discharge reports;
- Interacts with other regional programs to improve regulation;
- Contributes to our understanding of water quality science;
- Continues to revise and correct the municipal drainage mapping system;
- Vacuum sweeps street gutters on a weekly basis;
- Cleans city owned channels and catch basins annually;
- Identifies transient regional waste dischargers for Board action;
- Provides professional education and training regarding program progress;
- Inspects critical pollutant sources within available resource constraints;
- Is recognized by the APWA and Board Staff for progressive actions;
- Encouraged installation of over 1.4 million cubic feet of retention storage;
- Is already infiltrating hundreds of acre feet of potential runoff per year;
- Values the conservation and enhancement reasonably achievable receiving water beneficial uses, that do not endanger the public welfare;

The remainder of this City of Downey Report of Waste Discharge (ROWD) provides an in-depth discussion of our specific priorities and proposed programs for implementation under a City of Downey 2006 NPDES MS4 Permit. A significant part of this effort will be working with adjacent stakeholders and other MS4 operators to address indicator bacteria regrowth and other stormwater and runoff constituents within the underground drainage those agencies operate and maintain. Any 2001 NPDES Permit program not identified below as being a part of the 2006 Permit, has been excluded from the 2006 Permit terms for either legal, practical, or cost effectiveness reasons. It further bears repeating that many of the 2001 Permit terms remain subject to legal challenge, and that, as such, the City of Downey has not included various portions of the 2001 NPDES Permit which it contends may be contrary to State and/or federal law.

4.1 PROGRAM COMPONENTS

The following recommended improvements for the next NPDES MS4 Permit cycle include streamlining specific requirements, eliminating other requirements, providing the City of Downey with a safe harbor provision, maintaining steady implementation of programs that have not been challenged, or that have proven to work well for our City, and emphasizing results-based modifications to other programs to better utilize limited resources. Components in each of the programs have been identified as requiring some modification to improve the overall intent of the Permit, which is to develop, achieve, and implement a timely, comprehensive, cost-effective stormwater pollution control program to reduce the discharge of pollutants in stormwater from the MS4 to the MEP Standard and be consistent with the reasonableness standards under State Law.

4.2 PRIORITY 1 – RECOMMENDED ALTERNATIVE LANGUAGE FOR RECEIVING WATER LIMITATIONS

The Receiving Water Limitations language in Order No. 01-182 is a section of the 2001 Permit that is subject to the pending legal challenge. The City of Downey recommends that the Permit contain Receiving Water Limitations language which is consistent with applicable law and with which the City can comply. Order No. 96-054, the 1996 NPDES Permit, included language which stated “Timely and complete implementation by a Permittee of the storm water management programs prescribed in this Order shall satisfy the requirements of this section and constitute compliance with receiving water limitations.” It further provided that where an exceedance of a water quality objective had occurred, the Permittees were to submit stormwater programs that “will increase the likelihood of preventing future exceedances of water quality objectives.” This language was omitted from Regional Board Order No. 01-182. It is imperative that the City of Downey have the support of the Regional Board when making a good faith effort to comply with costly Permit requirements, and not be required to implement BMPs that go beyond the MEP or reasonableness standards under federal and state law.

The City of Downey, like other municipal Permittees, should not be required to strictly comply with water quality standards or objectives, especially those that have obvious or ubiquitous natural sources and are assimilable in the environment. Rather, compliance with such standards should be limited to compliance through the use of reasonable and cost-effective MEP-compliant BMPs. Constraining the City of Downey, or other Permittees, to an immediate, or never-ending, state of non-compliance, while requiring strict compliance with water quality standards or objectives that are neither reasonably achievable, nor practicable, is arbitrary and capricious, as well as contrary to law. Exposing the City of Downey, and other Permittees, to immediate third party initiated lawsuits is unproductive, discourages the potential for collaborative working relationships with non-governmental organizations, and doesn't achieve the laudable and primary goal of improving receiving water quality.

The following are proposed Findings of Fact and suggested Receiving Water Limitations language and definitions that should form the basis for the 2006 City of Downey NPDES MS4 permit:

Findings of Fact:

1. *Urban Runoff includes discharges from residential, industrial, commercial, and construction areas throughout the adjacent watersheds. In addition to accepting Urban Runoff from the City of Downey MS4, adjacent rivers receive flows from agricultural, open space, state and federal lands and facilities, schools, community colleges, state universities, and several other land use agencies not under the control or legal jurisdiction of the City of Downey or any other municipal Permittee.*

2. *Utilities, special districts, wastewater management agencies, and other point and non-point sources, which are otherwise permitted by or under the jurisdiction of the State or Regional Board, also contribute discharges that may enter the City of Downey MS4 and adjacent water bodies. The Regional Board recognizes that the City of Downey cannot be held legally responsible for any discharges or pollutants, either in stormwater or nonstormwater, running off of any such state regulated properties or facilities. Similarly, certain other activities that generate pollutants present in Urban Runoff are beyond the control or authority of the City of Downey to regulate or prohibit. Examples include internal combustion engine emissions, atmospheric deposition, brake pad and tire wear, pesticide residues, agricultural runoff, onsite wastewater treatment systems, and background conditions (e.g. wildlife, microbial replication, brush fires, and other naturally occurring sources of elements derived from local soils and geology).*

3. *The Regional Board finds that the unique aspects of the regulation of Urban Runoff discharges through MS4s, includes, but is not limited to, the intermittent and unpredictable nature of discharges, difficulties in monitoring, and limited physical control over the discharge conveyance systems. These attributes will require adequate time and resources to determine what persons or entities are responsible for reducing the discharge of pollutants in Urban Runoff discharged from the MS4.*

Receiving Water Limitations:

1. *The City of Downey shall continue to implement BMPs that reduce the discharge of pollutants from the City MS4 where such Urban Runoff discharges cause or contributes to an exceedance of water quality standards and objectives.*

2. *The City of Downey shall comply with Paragraph 1 through the use of reasonable, cost-effective, and MEP-compliant BMPs. The BMPs shall be designed taking into consideration those water quality standards or objectives that are reasonably required to ensure the reasonable protection of properly designated beneficial uses. Only water quality standards or objectives which can reasonably be achieved need to be complied with by the City of Downey, and only after the Board has considered: (a) the past, present and probable future beneficial uses of the receiving water; (b) the environmental characteristics of the hydrographic unit at issue, including the quality of water available thereto; (c) the water quality conditions that could reasonable be achieved through the coordinated control of all factors which affect water quality in the area; (d) economic considerations; (e) the need for developing housing in the region; and (f) the need to develop and use recycled water. In determining whether any*

particular water quality standard or objective must be complied with by the City of Downey, in addition to the above, the Regional Board shall further consider all demands being made, or to be made, on the subject waters, and the total values involved, beneficial and detrimental, economic and social, tangible and intangible. Compliance with applicable water quality standards or objectives is to occur through an iterative BMP process consistent with the provisions of this paragraph.

3. If an exceedance of a water quality standard or objective is believed to be due to discharges to the MS4 that are outside the City of Downey's jurisdiction or control, the City shall advise the Executive Officer of such in writing.

4. If the City of Downey has acted reasonably and in good faith in complying with the procedure set forth above, the City does not need to repeat the procedure for recurring exceedances of the same water quality standards or objectives. The Executive Officer may determine and provides written notice to the City that additional BMPs, consistent with Paragraph 2 above, should be implemented to comply with the water quality standards or objectives including the basis for the determination.

5. Reasonable and good faith compliance with the procedures set forth in this section shall satisfy the requirements of this Order and shall constitute compliance with applicable water quality standards or objectives.

Definitions:

- 1. "Maximum Extent Practicable" or "MEP" is the standard established by Congress in Clean Water Act section 402(p)(3)(B)(iii) that municipal dischargers of stormwater MS4s must meet. MEP generally emphasizes pollution prevention and source control and includes consideration of technical feasibility, practicability, cost effectiveness, benefits derived, regulatory compliance and public acceptance. Where cumulative costs exceed cumulative benefits, a program or BMP is not considered practicable.*
- 2. "Urban Runoff" is that water discharged to the MS4 for which the City of Downey is partially responsible when further discharged from the MS4 to receiving waters. Urban Runoff includes discharges from residential, industrial, commercial, and construction areas (that are not governed by a State issued NPDES Permit) within the Permit area, but the term "Urban Runoff" expressly excludes stormwater and nonstormwater discharges from agricultural, State permitted industrial activities or construction sites, open space, state and federal properties and facilities, school district properties, colleges and universities, waste water management agencies, other NPDES-permitted discharges, and other point and non-point source discharges that are not subject to regulation by the City of Downey.*

4.3 PRIORITY 2 – FUNCTION OF WATERSHED MANAGEMENT COMMITTEES

Order No. 01-182 requires Watershed Management Committees (WMCs) to carry out specific responsibilities as a group. These responsibilities included:

- a. Facilitating cooperation and exchange of information among Permittees;
- b. Establish goals and objectives and associated deadlines for the WMA, as the program implementation progresses;
- c. Prioritize pollution control efforts based on beneficial use impairment(s), watershed characteristics and analysis of results from studies and the monitoring program;
- d. Develop and/or update and monitor the adequate implementation, on an annual basis, of the tasks identified for the WMA;
- e. Assess the effectiveness of, prepare revisions for, and recommend appropriate changes to the SQMP and its components;
- f. Continue to prioritize the Industrial/Commercial critical sources for investigation, outreach and follow-up; and
- g. Meet four times per year and, as necessary.

The City's resources are limited. Requiring the City to perform additional tasks under the WMCs is extremely difficult because it takes valuable resources away from working on other Permit requirements that have a more significant impact on water quality.

While it is important for key personnel within a WMA to meet quarterly to facilitate cooperation in implementing stormwater programs and to exchange experiences and valuable information, the City recommends having the flexibility to independently determine how to implement its Permit programs, whether that be individually or as part of a WMA. The City recommends combining the WMC and impaired water body jurisdictional groups meetings, since the representatives will handle both obligations. This recommendation would reduce the need for unnecessary parallel meetings.

4.4 PRIORITY 3 – INDUSTRIAL AND COMMERCIAL FACILITIES CONTROL PROGRAM IMPROVEMENTS

Under Order No. 01-182, the 2001, the City of Downey was required to track, inspect, and ensure compliance at industrial and commercial facilities that the Regional Board has asserted are critical sources of pollutants in stormwater. Those provisions of Order No. 01-182 are presently being challenged by many of the 2001 Permittees, including the City of Downey, in the previously referenced legal challenge.

The City proposes that the so-called "Critical Sources" referenced in the 2001 Permit, such as commercial facilities (restaurants, automotive service facilities, retail gasoline outlets and automotive dealerships), and Phase I Facilities (both Tier 1 and 2), not be inspected under the new Permit, unless the City first determines that the facility is an industrial facility that is contributing a substantial pollutant load to the MS4.

There is no authority under state or federal law requiring the City of Downey to inspect commercial facilities, such as restaurants, automobile dealerships or gasoline service stations. For industrial facilities, the federal regulations leave it to the Permittee to determine which facilities to inspect, and when, and provide for the inspection of those industrial facilities which a Permittee determines are contributing a substantial pollutant load to the MS4. Accordingly, the City requests that the existing Industrial and Commercial Facility Control Program requirements under Order No. 01-182 be replaced with a provision that gives the City the discretion to inspect industrial facilities it determines are contributing a substantial pollutant load to the MS4.

Also, the 2001 Permittees found it unnecessary and a waste of resources to repeatedly inspect facilities that are found to be in compliance with the General Industrial Activities Stormwater Permit (GIASP). A more effective inspection strategy would target industrial facilities that are not in compliance where the Board, or City of Downey, determines the industrial facility has contributed a substantial pollutant load to the MS4.

Moreover, for those industrial facilities the City chooses to inspect or that the Board determines are not in compliance, the City recommends that the Annual GIASP inspection fees collected by the State Water Resources Control Board be distributed to the City for conducting any such inspections. This would encourage the City to make such inspections and avoid forcing industry to pay twice for a single inspection, or being subject to redundant inspections. In addition, to the legal objections to the inspection program in Order No. 01-182, financial constraints make it difficult for the City of Downey to carry out the required level of inspections and providing local agencies with monetary resources will facilitate more City inspections.

4.5 PRIORITY 4 – PEAK FLOW CONTROL AND STANDARD URBAN STORMWATER MITIGATION PLAN (SUSMP)

The City of Downey proposes that the Development Planning Program provisions as contained in Order No. 01-182 be deleted and not carried forward into the new Permit. State and Regional Boards are without authority to impose these provisions, and as such, the program provisions are inconsistent with state and/or federal law and should not be carried forward in the next Permit cycle. Moreover, these provisions under Order No. 01-182 are being challenged by many of the 2001 Permittees.

Continuing to require compliance with the SUSMP provisions, which reference a particular design criteria or other particular manner of compliance, is contrary to the prohibition of California Water Code section 13360. Require compliance with SUSMP provisions that compel municipalities to impose certain mitigation measures from undefined numerous "development" and "redevelopment" projects discharges,

irrespective of what mitigation measures may or may not be properly required under CEQA and the review process set forth therein, is arbitrary action that is contrary to law, and the Regional and State Boards lack the authority to impose any such requirements.

The Peak Flow Control provisions included in the 2001 Municipal NPDES Permit are in excess of the Regional and State Boards' authority, and therefore contrary to law, as neither the Clean Water Act, nor the Porter-Cologne Act, authorizes the State to regulate the "quantity" of stormwater or urban runoff.

The State and Regional Boards must consider the impacts that the Development Planning Program provisions will have on the development of low income or affordable housing as required under Water Code sections 13241(e) and 13263.

4.6 PRIORITY 5 – SPECIFIC BMP REQUIREMENTS

Under Order No. 01-182, the City of Downey was required to place and maintain trash receptacles at all transit stops within their jurisdiction. Prescriptive requirements such as this limit the ability of the City to analyze and determine the cost effectiveness and appropriateness of BMPs to address pollutants of concern in discharges from their MS4. They are further contrary to law. (See, e.g., Water Code § 13360.)

It is recommended that the City be given the flexibility to select suitable BMPs and their respective locations, to address pollutants of concern. The City also recommends that the explicit requirement to place and maintain trash receptacles at all transit stops be removed from the Permit, as it is presently the subject of the legal challenge to Order No. 01-182. Moreover, under the California Constitution, any such mandates may only be imposed upon the City if appropriate funds have been provided to fund the mandate.

4.7 PRIORITY 6 – DEVELOPMENT CONSTRUCTION PROGRAM AND STORM WATER POLLUTION PREVENTION PLANS (SWPPP) REDUNDANCY

The General Construction Activities Stormwater Permit (GCASP), Order No. 99-08-DWQ, requires all dischargers, where construction activities disturb one or more acres, to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), eliminate or reduce non-stormwater discharges to storm drain systems and other waters of the nation, and perform inspections of all BMPs. Requiring a Local SWPPP to substitute for a State SWPPP is redundant, and is the subject of the legal challenge to Order No. 01-182. The City of Downey recommends eliminating any references to Local SWPPP. The City also recommends that the Development Construction Program requirements as set forth under Order No. 01-182, be modified so that the City not be required to impose "minimum" unreasonable requirements on construction sites, such as unreasonable restrictions on the discharge of sediment or construction related material (including sand, gravel and other natural material) that may erode from a construction site. This concern is also the subject of the pending legal challenge.

4.8 PRIORITY 7 – ILLICIT CONNECTION and ILLICIT DISCHARGE ELIMINATION PROGRAM IMPROVEMENTS

The City of Downey has completed field screening of City owned open channels, priority underground pipes and expected to have completed field screening of underground pipes with a diameter of 36 inches by December 12, 2006. The City of Downey has worked to eliminate illicit connections and illicit discharges to the storm drain system, resulting in 300 report investigations and control actions. No illicit connections to the underground drain system have been detected and most connections were found on private property that could be subject to access limitations. Based partially on data submitted by the City of Downey, the evaluation of patterns and trends in illicit connections and illicit discharges prepared by Los Angeles County concluded that an average of 62.2% of all illicit connections and 81.5% of all illicit discharges are from:

- High Density Single Family Residential (typical urban areas)
- Retail and Commercial
- Light Industrial
- Multiple Family Residential
- Transportation

The City of Downey IC and ID program suggests a two component pattern combining random discharge reports by area residents and businesses with a normal distribution centered along routes taken by agency staff. It is recommended that since City resources are limited, the field screening of underground pipes be abandoned in favor of conducting more thorough illicit discharge investigations and continued GIS mapping efforts to delineate drainage system ownership and maintenance responsibilities.

The City of Downey recommends deleting the term "illicit disposal" from the definitions section of the Permit, since it is not used in the Permit and serves no useful purpose. Other definitions need to be more explicitly defined, or informally clarified, to establish consistent implementation and reporting among Permittees and the intent of the Board. The definition for "illicit discharge" should be revised to read, "any uncontrolled discharge that enters, or may reasonably enter, the MS4 and is prohibited under local, state, ..." This revision identifies an illicit discharge as an uncontained, non-stormwater discharge, that may enter the constructed storm drain system, while allowing a spill or wash water, that enters the gutter or roadway, to be contained and collected, provided it should not reach the receiving water.

4.9 PRIORITY 8 – PERMIT FORMAT

The City of Downey found that in many instances the format of the 2001 Permit and Annual Report were difficult to understand, redundant and convoluted. The City encourages the Regional Board to informally provide examples, tables and matrices to assist the City with Permit requirements, expectations, and submittal deadlines.

4.10 PRIORITY 9 – PERMIT IMPLEMENTATION COSTS

The City of Downey has experienced a 63% increase in program implementation costs over the past 3 years and consistently had to budget and divert money, earmarked for other municipal programs, to meet the obligations of the 2001 NPDES MS4 Permit. The City does not foresee new revenue streams to bridge the gap between future Permit compliance and other municipal programs. The Board should acknowledge the regional lack of implementation resources, prioritize the largest and most significant sources of pollution, and thereby utilize local agency support prudently, rather than preemptively and exhaustingly. The City of Downey has cited the redundant industrial and commercial facility inspections as diverting other municipal service support. The effort to insert numeric indicator bacterial objectives into the expiring 2001 permit reaffirms our previous concerns that permit implementation costs may grow exponentially.

4.11 PRIORITY 10 – DISCHARGE EXEMPTION REFERENCE

The City of Downey proposes to continue with the same non-stormwater discharges prohibition program (2001 Permit, Part 1), except that the exemption for potable supply systems should no longer reference non-existent American Water Works Association (AWWA) guidelines for dechlorination and suspended solids reduction practices, since they are unenforceable.

4.12 PRIORITY 11 – LEGAL AUTHORITY

The task of amending and adopting an enforceable City of Downey specific stormwater and urban runoff ordinance that addressed the requirements of the 2001 Permit took a significant amount of time and effort to complete. If a similarly complex legal authority is required by the Board, the City should be provided at least 12 months from Permit adoption to complete the necessary changes and possess adequate legal authority.

4.13 PRIORITY 12 – ANNUAL REPORT ENHANCEMENTS

The City of Downey recommends streamlining the Annual Report to only demonstrate significant permit compliance and the effectiveness of BMPs used, in accordance with the MEP and reasonableness standards under federal and state law, to reduce the discharge of runoff pollutants from the MS4. Redundant requirements, such as an assessment of SQMP requirements in reducing runoff pollution, are an unnecessary waste of municipal resources. The City of Downey recommends eliminating the following Annual Report section or questions:

- **Section IV.B.2 — Inspection Program** Provide the reporting data as suggested in the following tables. and **Section IV.B.3 — BMPs Implementation** Provide the reporting data as suggested in the following table. (It is unclear what the table was meant to include, the GIASP, Critical Source Inspections, or both. Provide more example rows to complete or explain. Table should have been in portrait format.)

- Section IV.C.7 — How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- Section IV.C.8 — What is the percentage of total development projects that were conditioned to meet SUSMP requirements?
- Section IV.D.5 — How many building/grading permits were issued to sites requiring Local SWPPPs last year?
- Section IV.D.6 — How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Stormwater Permit last year?
- Section IV.D.7 — How many building/grading permits were issued to construction sites less than one acre in size last year?

The following Annual Report tables should be modified to eliminate confusion and improve the quality of data submitted:

Section IV.F.10 — Delete and replace with the following illicit connections table:

Number of Suspected Illicit Connections Reported	Number of Suspected Illicit Connections Investigated	Number of Illicit Connections Terminated	Number of Suspected Illicit Connections found not to be Illicit	Number of Suspected Illicit Connections that resulted in Enforcement Action
--	--	--	---	---

Section IV.F.13 — Delete and replace with the following illicit discharges table:

Number of Suspected Illicit Discharges Reported	Number of Suspected Illicit Discharges Investigated	Number of Illicit Discharges Terminated	Number of Suspected Illicit Discharges found not to be Illicit	Number of Suspected Illicit Discharges that resulted in Enforcement Action
---	---	---	--	--

4.14 PRIORITY 13 – PUBLIC INFORMATION AND PARTICIPATION ENHANCEMENT

The City of Downey concurs with the County of Los Angeles in recommending that the minimum 35 million mass media impressions per year requirement be deleted from the next MS4 permit. Furthermore, based on the 1-2% attendance rate, the City also recommends deleting the restaurant and gas station Workshop management education, which was both costly and wholly ineffective. The City favors the cost-effective local approach used in our continuing Keep Downey Beautiful Campaign, the achievements of which were previously summarized and reported in section 3.2.

4.15 IMPLEMENTATION APPROACHES

The City of Downey has diligently initiated comprehensive watershed programs and provided education to other agencies about Board requirements. As Chair of the Executive Advisory Committee (EAC), current Chair of the San Gabriel River Watershed Management Committee (SGR WMC), active member of CREST and the San Gabriel River Monitoring Workgroup committee member, we have educated many stakeholders about Basin Plan, TMDL, MS4 Permit, Waste Discharge Requirements and their implementation in the City of Downey. Others have suggested that Permittees could meet the 2001 MS4 permit requirements and correct 303(d) list impairments by installing inexpensive catch basin inserts and trash diverting screens, covering trash cans, or sweeping parking spaces. Not surprisingly these marginally effective BMPs account for nearly 33,000 of the nearly 35,000 BMPs reported in the municipal annual reports. Many of the Integrated Water Management and Jurisdictional TMDL Implementation Plans are retreating to smaller and less effective 0.5' to 0.25" design storms. These are the collective implementation standards for most of the existing city watershed programs.

In contrast, the city of Downey has implemented a development planning and construction program that has resulted in the permitting and continuing installation of more than 550 infiltration systems based on the 0.75" SUSMP design storm. This amounts to about 1.4 million cubic feet of retention storage and at this time the potential to divert hundreds of acre feet of runoff per year. This volume is equal to more than 10 cubic feet of retention storage per City of Downey resident, more than any other Permittee and probably more retention storage than any other 2001 Permittee; perhaps more than the sum of all the other Permittees together. Adopting more prescriptive and inflexible permit requirements would be premature and could undermine this City of Downey program and our commitment to achieving regional water quality goals.

In recognition of the substantial achievements of the City of Downey, its residents, builders, and businesses, we request the issuance of a City of Downey NPDES MS4 Permit that reflects our flexible approach to runoff management and contribution toward achieving regional water quality goals. The ultimate goal of this MS4 Permit being to implement cost-effective program components that reduce the discharges of pollutants in stormwater and urban runoff from the Municipal Separate Storm Sewer System to the Maximum Extent Practicable standard and reasonableness requirements of federal and state law.

4.16 TOTAL MAXIMUM DAILY LOAD IMPLEMENTATION PLANS

Under the Federal CWA of 1972, States must develop lists of impaired waters and the pollutants causing them to be impaired, also known as a 303(d) List. With the goal of bringing each listed water body into compliance with water quality standards, the States must then establish pollutant specific TMDLs, that are consistent with State and federal law applicable to their adoption and implementation. One of the objectives of this NPDES MS4 Permit is to protect existing beneficial uses for receiving waters around the

City of Downey through an iterative BMP approach that reduces the discharge of pollutants in stormwater to the MEP and reasonableness standards.

TMDL waste load allocations may be complied with through an Implementation Plan, that identifies appropriate BMPs and may be adopted as Waste Discharge Requirements ("WDRs") or a Memorandum of Understanding ("MOU") between the Board and affected dischargers. TMDLs, applying to municipal discharges, should be implemented through the subsequent adoption by the Boards of separate MOUs which delineate the reasonable and cost-effective MEP-compliant BMPs to be undertaken. Such MOUs should provide that good faith compliance and implementation of the BMPs set forth therein shall constitute compliance with the adopted TMDLs.

US EPA has stated that TMDLs can be implemented through a variety of mechanisms, including voluntary agreements. The City of Downey proposes that TMDL's be implemented through Memorandums of Understanding (MOUs) between the Board and the City. Implementing TMDLs through the NPDES Permits is contrary to EPA policy which support the implementation of CWA stormwater requirements through an iterative BMP based approach.

The City thus recommends an MOU between the State and Regional Boards and responsible agencies be adopted in lieu of including TMDLs in the NPDES Permit. The TMDLs applicable to the City would then be implemented through the adoption of separate MOUs setting forth reasonable and cost-effective BMPs. Such MOUs should provide that good faith compliance and implementation of the BMPs set forth in the developed Implementation Plan would constitute compliance with the adopted TMDLs. The use of MOUs is authorized by the Water Quality Control Policy for Addressing Impaired Waters: Regulatory Structure and Options, adopted by State Board Resolution No. 2005-0050 (June 16, 2005). The effluent limitations in the Permit itself should be expressed as BMPs. See EPA Memorandum, Establishing Total Maximum Daily Load (TMDL) Waste Load Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs (November 22, 2002), p.4.

All BMPs proposed to be implemented to meet a TMDL's waste load allocation(s), should, moreover, be in accordance with the MEP and reasonableness requirements of federal and State law, and particularly the requirement that the City only be required to comply with those water quality standards/objectives which are "reasonably achievable," taking into account economic considerations, impacts on housing within the region, the past, present and probable future beneficial uses of the water, the environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto, and the total values involved, beneficial and detrimental, economic and social, tangible and intangible.

As set forth in a November 22, 2002 EPA Guidance Memorandum ("EPA Guidance Memo"), EPA determined that where a TMDL is developed for stormwater discharges: "because stormwater discharges are due to storm events that are highly variable in frequency and duration and are not easily characterized, only in rare cases will it be

feasible or appropriate to establish numeric limits for municipal and small construction stormwater discharges.” EPA further found that:

Under certain circumstances, BMPs are an appropriate form of effluent limits to control pollutants in storm water. See 40 C.F.R. § 122.44(k)(2) & (3). If it is determined that a BMP approach (including an iterative BMP approach) is appropriate to meet the storm water component of the TMDL, EPA recommends that the TMDL reflect this. (*Id.* at p. 5 of EPA’s Guidance Memo.)

5.0 WATER QUALITY MONITORING

The intent of the City of Downey ROWD is to contribute to the regional monitoring effort by focusing on a drainage area in which our community's impact might become evident, while coordinating with other stakeholders whose regional programs are currently too coarse to detect the incremental changes occurring in adjacent watershed areas. The proposed City of Downey monitoring program is in conformity with the draft Los Angeles County Monitoring Program, which reallocates resources toward studies and monitoring programs that allow for a better measure of SQMP effectiveness through a reduction in pollutant loadings from urban and storm runoff.

The City has been an integral participant in the San Gabriel River Watershed Monitoring Workgroup effort, now managed by the Los Angeles and San Gabriel Rivers Watershed Council, since it was first initiated on March 2, 2004. Similarly, the City of Downey has participated in making technical decisions and reviewing the Cleaner Rivers through Effective Stakeholder-led TMDLs (CREST) process, including recent in-kind professional staff (sampling) services. The City of Downey is reluctant to betray the significant technical and monetary investment, by a variety of stakeholders, through recommendation and development of a competing monitoring program. Instead we propose to implement a monitoring effort at the upper and lower extent of Reach 1 of the Rio Hondo and cooperate with other Los Angeles or San Gabriel River monitoring efforts, provided the level of support does not undermine our local effort and is commensurate with contributions from other municipal stakeholder agencies and our contribution to the total contributory watershed area.

As contemplated, the City of Downey Monitoring effort will focus on Reach 1 of the Rio Hondo River, which begins at Interstate 5 near the northernmost corner of the City and ends at the confluence with the Los Angeles River at Imperial Highway, just west of Downey. Just over 27% (3.40 square miles) of Downey drains to the Rio Hondo along with portions of South Gate, Bell Gardens, Commerce and Montebello. In the draft 2006 303(d) listing documents, this Reach has been listed as "do not de-list" for ammonia and pH, which is primarily being addressed through treatment plant operational modifications by the County Sanitation Districts of Los Angeles County. The adopted 2002 303(d) list this reach for copper, high coliform count, lead, pH, trash and zinc. Trash is difficult to quantify effectively in low flows and pH seems to be highly correlated with algae growth and supersaturated oxygen concentrations. Since dry-weather monitoring of trash and pH is too subjective and qualitative to facilitate effective sampling, they are not currently including in our monitoring proposal.

The proposed City of Downey monitoring effort would focus on Rio Hondo Reach 1 and begin during the first quarter following City of Downey MS4 Permit acceptance, when a Monitoring and Sampling Quality Assurance Project Plan would be developed in consultation with other local agencies and Board Staff. During the quarter after acceptance of the Monitoring QAPP, samples would be taken at the upper and lower ends of this reach at locations agreed upon in consultation with Board Staff. In this area dry weather flows are generally diffuse and braided across the channel bottom, making

collection of representative samples difficult. Grab sampling are likely to require flow concentration between a narrow gap which should also facilitate more accurate flow measurement. Parameters to be tracked include flow rate, hardness, metals (broad screen ICP/MS or AES method such as 200.7), indicator bacteria, and semi-volatiles (GC/MS method such as 625).

A brief annual monitoring report would prepared and presented to the Board for consideration, along with suggestions for future monitoring or source control efforts. This report would estimate pollutant loadings within Reach 1 based on flow and concentrations as possible based on the analytical results available.



California Regional Water Quality Control Board

Los Angeles Region

RB-AR114



Linda S. Adams
Agency Secretary

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

July 12, 2006

Mr. Gerald Caton
City Manager
City of Downey
11111 Brookshire Avenue
Downey, CA 90241

THE REISSUANCE OF THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM WATER DISCHARGE PERMIT FOR THE COUNTY OF LOS ANGELES AND PERMITTEES (NPDES No. CAS004001, ORDER No. 01-182) - REVIEW OF THE CITY OF DOWNEY REPORT OF WASTE DISCHARGE

Dear Mr. Caton:

We have received the Report of Waste Discharge (ROWD) submitted on June 12, 2006 for a Downey Municipal Separate Storm Sewer System Permit (DMS4 Permit). Municipal storm water discharges from the City of Downey are presently regulated under Regional Board Order No. 01-182, which expires on December 12, 2006.

The City of Downey (City) by submitting a separate ROWD is pursuing a separate MS4 permit and will assume among other things, the responsibility for a city specific storm water management program and monitoring program.

Our review of the ROWD indicates that while the City is proposing some positive changes other areas of the ROWD do not satisfy federal storm water regulations contained in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (61 Fed Reg. 41697). Some of the inadequacies include but are not limited to the following:

1. The elimination of inspection programs for commercial facilities;
2. The elimination of the Development Planning Program including SUSMP and peak flow controls;
3. The elimination of Local SWPPPs for all construction sites 1 acre and greater;
4. The monitoring program description only includes monitoring of the Rio Hondo but not of the Los Angeles or San Gabriel Rivers to which the City discharges; and
5. The proposal for inclusion of TMDL requirements only in memoranda of understanding (MOUs) in lieu of TMDL Waste Load Allocations (WLAs) included in NPDES Permits as required by federal regulations.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Gerald Caton
City of Downey

- 2 -

July 12, 2006

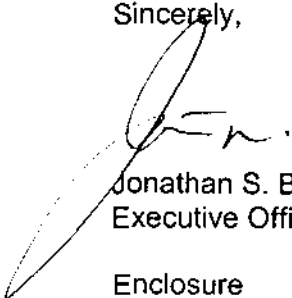
Federal Regulations (40 C.F.R. § 122.44(d)(1)(vii)(B)) require that NPDES Permits incorporate all applicable TMDL WLAs when reissued and are made enforceable. There is no existing authority to use MOUs for compliance within the NPDES regulatory scheme. Further, any dry weather WLAs are unaffected by storm water policy.

The ROWD did not satisfy the requirements in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (61 Fed Reg. 41697). For these and other deficiencies in the ROWD, we deem it incomplete.

We do however, look forward to working out these details with your staff during the MS4 permit reapplication process. Our review will not be deemed to prejudice the Board from raising additional subject matter not identified herein, during the permit reissuance process. We intend to conduct a series of work-group meetings to receive input over the coming months with Permittee representatives and interested persons, to assist us in developing permit requirements. Pursuant to 40 CFR 122.6, Order 01-182 shall remain in effect and enforceable until a replacement LA MS4 Permit (with Downey as a Permittee) or Downey MS4 Permit is adopted by the Board.

If you have any questions, please do not hesitate to contact me at (213) 576-6605 or Dr. Xavier Swamikannu at (213) 620-2094 or Carlos Urrunaga at (213) 620-2083.

Sincerely,

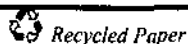


Jonathan S. Bishop
Executive Officer

Enclosure

cc: Mr. Michael Levy Esq, Office of the Chief Counsel, State Water Resources Control Board
Mr. Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board
Mr. Eugene Bromley, CWA Standards and Permits, USEPA Region IX
Mr. Dan Lafferty, Watershed Mgmt. Division, Los Angeles County Dept. of Public Works

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



CITY OF SIGNAL HILL

2175 City Avenue • Signal Hill, California 90745 • 562-537-9999

June 12, 2006

Via Messenger

Mr. Jonathan Bishop
 Executive Director, LARWQCB
 Suite 200
 320 West 4th Street
 Los Angeles, CA 90013-2342

**Re: City of Signal Hill Report of Waste Discharge – Renewal Application for
 Municipal NPDES Permit**

Dear Mr. Bishop:

Please find enclosed the City of Signal Hill's Report of Waste Discharge (ROWD), Stormwater Quality Management Program and application for the renewal of its 2001 Municipal National Pollutant Discharge Elimination Systems ("NPDES") permit. As requested, we have also enclosed a copy a "red lined" copy of where our permit differs from the ROWD being submitted by Los Angeles County. The Signal Hill ROWD also includes a separate and complete monitoring program as well.

Our ROWD provides a report on the 2001 NPDES Permit for Signal Hill, and further includes information on the County of Los Angeles' and other cities' progress, as the 2001 Permit is a joint NPDES Permit with the County and other Los Angeles County cities. In preparing the ROWD, Signal Hill relied on the County's ROWD as basis for its data and information on the programs of the County and other cities covered under the 2001 Permit.

The City looks forward to working with the Regional and State Boards on the issuance of the renewed NPDES Permit, and is hopeful that City's decision to seek a separate permit will be well received by the Boards, since it is an effort by the City to better manage its storm water programs and better control the discharge of pollutants from our municipal separate storm sewer system.

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 LOS ANGELES COUNTY

Mr. Jonathan Bishop

June 12, 2006

Page 2

As you are aware, many of the smaller cities have been searching for cost-effective programs to submit this ROWD cycle. Many cities have expressed the desire to implement watershed and sub-watershed planning efforts. Cities have also expressed the concern that the Regional Board will require unreasonable or unduly costly programs for cities filing separate ROWDs.

It is our hope that future ROWDs will be based on watersheds and subwatersheds, instead of the current "one-size" fits all approach. This will assist cities in better tailoring their programs to address specific water quality needs in their communities. Subwatershed permits will assist Signal Hill in coordinating our program with the City of Long Beach's program. As you are aware, the City of Long Beach has historically obtained a separate ROWD. The Signal Hill's ROWD contains some specific programs that we believe will better address the water quality needs of our community. We are hopeful that the Regional Board will consider appropriate rationale for replacement programs.

Please contact me if you have any questions or need any additional information regarding this submittal. Thank you for your assistance and cooperation in this matter.

Sincerely,



Kenneth C. Farfing
City Manager

cc: Mayor & Council

Mr. David Aleshire, City Attorney

Mr. Rich Montevideo, Special Counsel

Mr. Charlie Honeycutt, Public Works Director

Mr. John Hunter, Storm Water Consultant

Mr. Don Wolfe, Public Works Director, LACDPW

Mr. Gerald Miller, City Manager, City of Long Beach

Attachments: Signal Hill ROWD
Red-Lined Version

REPORT OF WASTE DISCHARGE

**Renewal Application for the City of Signal Hill
National Pollutant Discharge Elimination System
Municipal Stormwater Permit**

June 12, 2006

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1.0 INTRODUCTION

1.1 PURPOSE

In accordance with the requirements found in Part 6, Section S of the existing 2001 Los Angeles County National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit (NPDES No. CAS004001), Order No. 01-182, this Report of Waste Discharge (ROWD) constitutes the City of Signal Hill's (hereafter "City") Municipal Stormwater NPDES Permit application for the renewal of Waste Discharge Requirements (WDRs) adopted in Order No. 01-182 by the Regional Water Quality Control Board, Los Angeles Region (Regional Board) on December 13, 2001. This ROWD is thus being submitted as both a Report of Discharge under Order No. 01-182 (an NPDES Permit that included as Permittees thereunder the County of Los Angeles, the Los Angeles County Flood Control District [the Principal Permittee] and all incorporated Cities within the County, except the City of Long Beach), as well as an application for the City's renewal of this 2001 NPDES Permit. This ROWD includes a report on the activities and results of the programs implemented under Order No. 01-182 for all Permittees thereunder, consistent with the County's ROWD, along with proposed programs and permit terms for the City's renewed NPDES Stormwater Permit.

The City of Signal Hill is proud to have one of the best NPDES permit programs in the County. Our program has consistently gone beyond the minimum requirements in the 2001 NPDES Permit. The estimated costs to implement Order No. 01-182, as set forth in the City's annual reports, was \$3,452,800. The City invested over \$534,895 in NPDES permit programs in 2004-05 alone. This amounts to \$126.27 per household, substantially above the Countywide average of \$18 per household reported by the Regional Board in 2005.

Several noteworthy projects include Signal Hill's management of the Hamilton Bowl Trash Reduction Project and the Willow Street/Cherry Avenue Corridor Clean Up Program. The Hamilton Bowl Trash Reduction Project is a Best Management Practices pilot program that is designing, constructing, operating and testing trash-catching devices in a regional urban runoff retention facility. The project also includes the City of Long Beach, the County of Los Angeles and the State Water Board as funding partners.

In addition, the Willow Street/Cherry Avenue Corridor Clean-Up Program collects trash and debris along two of the City's busiest commercial corridors. The program involves the Long Beach Conservation Corp under contract to the City, the City's Public Works Crews and the City's bus shelter contractor. It includes the cleaning of the bus shelters three times per week and weekly general clean-up of trash and debris.

Also, the City's Redevelopment Agency funded the Las Brisas Drainage Basin. The drainage basin collects runoff from the 6-acre project site, consisting of 80 units of low-income housing, a city mini-park and neighborhood community center. The non-profit housing developer could not afford to construct the drainage basin and keep the

housing affordable for very-low income residents, so the Signal Hill Redevelopment Agency included the drainage basin costs in its financial assistance to the project.

Signal Hill has also been active in organizing many of the small cities in Los Angeles County, by providing scientific, technical and legal experts in the area of storm water and urban runoff. Known as the Coalition for Practical Regulation, this ad hoc group of cities, presently totaling 43-cities, is dedicated to finding cost-effective solutions to the problems of storm water and urban runoff, based on sound science and engineering. The City has also taken the lead to organize various scientific studies and funding for the Metals TMDL for the Los Angeles River.

These are just a few examples of the efforts undertaken by the City to improve water quality, not only in Signal Hill, but in other parts of the County as well.

The City believes that this ROWD should place greater emphasis on the watersheds and subwatersheds in the Region. Although there are large regional issues, such as the problems of airborne metals reaching receiving waters, there are unique issues confronting the watershed and subwatersheds. This ROWD moves from the traditional approach of 84-cities applying with Los Angeles County as the Principal Permittee, to the City taking on greater responsibility for water quality in its community. This ROWD emphasizes Best Management Practices (“BMPs”), in lieu of strict numeric limits. This emphasis is based on the expectations of the United States Environmental Protection Agency (“EPA”), as follows: **“EPA expects that most WQBELs for NPDES-regulated municipal storm water discharges will be in the form of BMP’s and that numeric limits will only be used in rare instances.”** (US. EPA Memorandum of November 22, 2002, from Robert Wayland, Director of Wetlands, Oceans and Watershed & James Hanlon, Office of Wastewater Management, EPA Headquarters, to all Water Division Managers – Regions 1-10)

The BMP approach recognizes that cities have limited financial, technical and scientific resources to apply in any five-year NPDES permit cycle to pollution reduction programs. It also recognizes that BMPs are in their infancy in terms of pollution reduction. For example, Caltrans’ “peer reviewed” studies indicate that the most recent generation of structural BMPs, such as sand-filters, do not reduce metal pollutants found in surface waters below the California Toxic Rule levels. Clearly additional investment in studies, design, construction and testing will be required as a part of an iterative BMP process.

It is also important to note that following the issuance of Order No. 01-182, numerous Permittees under the 2001 Permit filed legal challenges to many of the terms and provisions of Order No. 01-182, as well as to the procedure and review and approval process followed by the Regional Board when adopting the 2001 Permit. These legal challenges remain pending before the Court of Appeal of the State of California, Second Appellate District, Appellate Court Case No. B184034.¹

¹ The following Permittees are appellants and continue to challenge many of the provisions in Order No. 01-182: The Cities of Arcadia, Artesia, Bellflower, Beverly Hills, Carson, Cerritos, Claremont, Commerce, Covina, Diamond Bar, Downey, Gardena,

Further, in light of the significance of implementing a new set of WDRs and an NPDES Permit, and the potential impacts on the environment from the same, the City requests that before any new Permit is issued based on this ROWD, that the State and Regional Board's first take all action as required to comply with the California Environmental Quality Act ("CEQA"), recognizing that any exemption provided under California Water Code section 13389 is a limited exemption from Chapter 3 of CEQA only. Moreover, there is no exemption from CEQA where the State and Regional Boards impose permit requirements which go beyond the federal law requirements set forth under the Clean Water Act. Accordingly, compliance with the requirements of CEQA, before a new municipal permit for the City is issued, is essential so that all potentially significant adverse impacts to the environment from this project, are fully evaluated and properly mitigated, and so that all feasible alternatives to particular permit terms that may result in potentially significant adverse impacts, have been evaluated.

The City also remains concerned with the imposition of unfunded mandates under Order No. 01-182, and thus requests that any mandated programs under the new permit only be imposed on the City where the requirements of the California Constitution prohibiting the imposition of unfunded mandates upon the City, have been complied with. The City is presently a party to a lawsuit challenging a decision of the Commission on State Mandates ("Commission") refusing to consider various test claims for reimbursement of costs to comply with certain storm water programs under the 2001 NPDES Permit. The lawsuit was filed by the City, the County and other Los Angeles County cities, in Los Angeles County Superior Court, with the Superior Court granting judgment in the City's favor, and setting aside the Commission's decision refusing to consider the test claims, and directing that the Commission consider such claims. The Commission appealed the decision and the case is pending before the California Court of Appeal, Second Appellate District. The renewed permit should not contain mandated programs that are imposed in violation of the State Constitution's prohibition on imposing unfunded mandates on municipalities.

In addition, because the Regional Board is not a State agency with State-wide jurisdiction, the Regional Board is not an agency that by itself has the authority to issue an NPDES permit under the Clean Water Act. Accordingly, the City requests that any new NPDES permit to be issued to the City, be issued only after it has been reviewed and ultimately approved by the State Water Resources Control Board ("State Board").

The City is submitting this ROWD with the understanding that it is not waiving any rights, objections or challenges it has brought or may bring in connection with the issuance of Order No. 01-182, or any other related objections and challenges that may have been brought by the City to other water quality orders, directives or regulations, and with the understanding that the City is not waiving or relinquishing any rights it has

Hawaiian Gardens, Industry, Irwindale, La Mirada, Lawndale, Monrovia, Norwalk, Paramount, Pico Rivera, Rancho Palos Verdes, Rosemead, Santa Clarita, Santa Fe Springs, Signal Hill, South Pasadena, Torrance, Vernon, Walnut, West Covina, Westlake Village, Whittier, and the County of Los Angeles and the Los Angeles County Flood Control District.

or may have in connection with any new permit to be issued to replace Order No. 01-182.

In addition to the report and recommendations contained herein, Permittees reserve their right to object to those terms of the NPDES Permit or modifications to those terms of the Permit which are not addressed in this ROWD. This ROWD, and the contents herein, do not constitute a waiver of the Permittees' rights to challenge objectionable terms contained in previous, current, or future Permits, and no contrary inference should be drawn.

1.2 REGULATORY BACKGROUND

The 1972 Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) Permit program to regulate the discharge of pollutants from point sources to waters of the United States. In response to the 1987 Amendments to the Federal Clean Water Act (CWA), the United States Environmental Protection Agency (EPA) developed Phase I of the NPDES Stormwater Program in 1990, which established a framework for regulating urban stormwater runoff. The Phase I program addressed sources of stormwater runoff that had the greatest potential to negatively impact water quality. Under Phase I, EPA required NPDES Permit coverage for stormwater discharges from:

- Medium and large municipal separate storm sewer systems (MS4) with populations of 100,000 or more; and
- Companies that fall within eleven categories of industrial activity, including construction activities to be governed by the Phase 1 Permit.

Operators of MS4s regulated under the Phase I NPDES Stormwater Program were required to obtain Permit coverage for stormwater discharges under their control. The most significant portion of application was the development of a proposed stormwater management program that would meet the standard of reducing the discharge of stormwater pollutants from the MS4 to the maximum extent practicable (MEP).

1.3 OBJECTIVES

The objective of the City in submitting this ROWD is to successfully renew an NPDES Municipal Stormwater Permit that includes requirements to achieve the goal of "reducing pollutants to the MEP" while taking into account:

- Feasibility;
- Financial resources available;
- Cost of implementation;
- Overall benefit to water quality;
- Effectiveness of existing Stormwater Quality Management Program (SQMP);
- Suggested improvements to existing SQMP;

- Suggested approaches to improve receiving water quality;
- Use of best available technologies; and
- Integration of impaired water body specific programs.

1.4 PROGRAM DESCRIPTION

On December 13, 2001, the Regional Board adopted Order No. 01-182 serving as the NPDES Permit for municipal stormwater and urban runoff discharges within the County of Los Angeles. The requirements of Order No. 01-182 apply to 84 Cities and the unincorporated areas of Los Angeles County under County jurisdiction, with the exception of Avalon, Long Beach, and the portion of Los Angeles County in the Antelope Valley, which includes the Cities of Lancaster and Palmdale. Under the 2001 Permit, the Los Angeles County Flood Control District is designated the Principal Permittee, and the County of Los Angeles along with 84 incorporated Cities are designated Permittees. In Order No. 01-182, the Principal Permittee coordinates and facilitates activities necessary to comply with the requirements of the Permit, but is not responsible for ensuring compliance of any of the Permittees. It should be noted that many parts of Order No. 01-182 have been challenged in a lawsuit filed in Los Angeles County Superior Court by a number of the Permittees thereunder. This legal challenge remains pending on appeal, in the Court of Appeal of the State of California, Second Appellate District, Case No. B184034.

Through the 2001 Permit, the Regional Board implemented a Watershed Management Approach to address water quality protection in the region. The 2001 Permit divides Los Angeles County into the following six Watershed Management Areas (WMAs):

- Ballona Creek and Urban Santa Monica Bay WMA
- Dominguez Channel/Los Angeles Harbor WMA
- Los Angeles River WMA
- Malibu Creek and Rural Santa Monica Bay WMA
- San Gabriel River WMA
- Santa Clara River WMA

A list of Permittees under the 2001 Permit, according to Watershed Management Area, is provided in Table 1.

Table 1 — Table of Permittees under City's 2001 Permit

Santa Monica Bay	Los Angeles River	San Gabriel River
Malibu Creek and Other Rural	Alhambra	Artesia
Agoura Hills	Arcadia	Azusa
*Calabasas	Bell	Baldwin Park
Los Angeles County Flood Control	Bell Gardens	Bellflower
Los Angeles County	Burbank	Bradbury
Malibu	Commerce	Cerritos
Westlake Village	Compton	Claremont
	Cudahy	Covina
Ballona Creek and Other Urban	El Monte	Diamond Bar

Santa Monica Bay	Los Angeles River	San Gabriel River
Beverly Hills	*Glendale	Downey
Culver City	Hidden Hills	Duarte
El Segundo	Huntington Park	Glendora
Hermosa Beach	La Canada Flintridge	Hawaiian Gardens
<i>Los Angeles (City of)</i>	<i>Los Angeles (City of)</i>	Industry
<i>Los Angeles County Flood Control</i>	<i>Los Angeles County Flood Control</i>	Irwindale
<i>Los Angeles (County of)</i>	<i>Los Angeles (County of)</i>	La Habra Heights
Manhattan Beach	Lynwood	La Mirada
Palos Verdes Estates	Maywood	La Puente
Rancho Palos Verdes	Monrovia	La Verne
Redondo Beach	Montebello	Lakewood
Rolling Hills	Monterey Park	<i>Los Angeles County Flood Control</i>
Rolling Hills Estates	Paramount	<i>Los Angeles (County of)</i>
*Santa Monica	Pasadena	Norwalk
West Hollywood	Rosemead	Pomona
	San Fernando	Pico Rivera
	San Gabriel	San Dimas
	San Marino	Santa Fe Springs
Dominguez Channel	Sierra Madre	Walnut
Carson	Signal Hill	West Covina
Gardena	South El Monte	Whittier
Hawthorne	South Gate	
Inglewood	South Pasadena	Santa Clara River
Lawndale	Temple City	*Santa Clarita
Lomita	Vernon	<i>Los Angeles County Flood Control</i>
<i>Los Angeles (City of)</i>		<i>Los Angeles (County of)</i>
<i>Los Angeles County Flood Control</i>		
<i>Los Angeles (County of)</i>		
*Torrance		

*Agencies indicated in italicized font are present in more than one Watershed Management Area. * Indicates City with the largest watershed population other than County of Los Angeles and the City of Los Angeles*

2.0 APPLICANT INFORMATION

This ROWD is being submitted on behalf of the City of Signal Hill whose address and contact information are as follows:

Mr. Charlie Honeycutt

Director of Public Works

City of Signal Hill

2175 Cherry Avenue

Signal Hill, CA 90755

3.0 PROGRAM ACCOMPLISHMENTS

The 2001 Los Angeles County NPDES Municipal Stormwater Permit set implementation requirements for Discharge Prohibitions, Receiving Water Limitations, Storm Water

Quality Management Program Implementation, Special Provisions, Definitions, and Standard Provisions. Some requirements have been in place for several Permit cycles; some have evolved as a result of Permittee implementation and experiences; and still others were imposed on the Permittees by the Regional Board. All prohibitions and limitations have been observed and followed to the maximum extent practicable to ensure Permit compliance. However, many Permit terms remain subject to challenge through the pending legal challenge to Order No. 01-182.

The 2001 Permittees implemented programs that met and often exceeded the basic provisions of the existing 2001 NPDES Permit, but recognize that continued progress requires program approaches that are strategic, measurable, beneficial, cost-effective and adaptive.

3.1 STORMWATER QUALITY MANAGEMENT PROGRAM

As a general requirement, the 2001 Permittees implemented the SQMP developed for the 2001 NPDES Permit, and its components, to reduce the discharge of pollutants in stormwater from the MS4 to the MEP. Where necessary, such Permittees implemented additional controls to reduce the discharge of pollutants from the MS4. The Permittees made a good faith effort to require and implement the most effective combination of MEP-compliant best management practices (BMPs) for stormwater/urban runoff pollution control.

The Principal Permittee in the 2001 NPDES Permit (the Los Angeles County Flood Control District) coordinated and facilitated activities to comply with the requirements of the NPDES Permit. The Los Angeles County Department of Public Works (LACDPW) coordinated Permit activities among Permittees and the Principal Permittee acted as a liaison between the Permittees and the Regional Board.

The Principal Permittee in the 2001 Permit implemented the Countywide Monitoring Program and evaluated, assessed, and synthesized the results of the monitoring program. Annual Monitoring Reports were submitted by August 15th of each year and the 1994-2005 Integrated Receiving Water Impacts Report was submitted on August 15, 2005. In addition, said Principal Permittee coordinated the collection, processing, and submittal of annual reports to the Regional Board. The other Permittees prepared an annual budget summary of expenditures applied to their stormwater management program.

The 2001 Permittees obtained and possessed the necessary legal authority to prohibit nonstormwater discharges to the storm drain system. Ordinances were adopted to prohibit the discharge of runoff to the MS4 from: wash water from the cleaning of gas stations, auto repair garages, or other types of automotive services facilities; mobile auto washing, steam cleaning, mobile carpet cleaning, and other such mobile commercial and industrial operations; areas where repair of machinery and equipment which are visibly leaking oil, fluid or antifreeze, is undertaken; storage areas of materials containing grease, oil, or other hazardous substances, and uncovered receptacles containing hazardous materials; chlorinated/brominated swimming pool water and filter

backwash; the washing of toxic materials from paved or unpaved areas; washing impervious surfaces in industrial/commercial areas; and concrete or cement laden wash water from concrete trucks, pumps, tools, and equipment.

3.2 PUBLIC INFORMATION AND PARTICIPATION

The Principal Permittee under the 2001 Permit developed and implemented a Public Information and Participation Program (PIPP) that met the following objectives:

- Measurably increase the knowledge of the target audience regarding the MS4, the impacts of stormwater pollution and urban runoff on receiving waters, and the potential solutions to mitigate the problems caused by stormwater and urban runoff;
- Measurably change the waste disposal and runoff pollution generating behavior of target audiences by encouraging implementation of appropriate solutions; and
- Involve and engage socio-economic groups and ethnic communities in Los Angeles County to participate in mitigating the impacts of stormwater and urban runoff pollution.

The public education campaign was designed to meet the objectives of the 2001 NPDES Permit. For the renewed Permit, the City will work with the County Flood Control District, and will rely on the Public Information and Participation Program developed and to be implemented by the Flood Control District. Modifications to the 2001 Permit Program are proposed by the County Flood Control District based on research results and current social marketing theory to achieve the desired behavioral changes. The 2001 Permittees complied with the requirements of the PIPP under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by the 2001 Permittees.

3.3 INDUSTRIAL/COMMERCIAL FACILITIES CONTROL

In accordance with the 2001 NPDES Permit, the Permittees thereunder required the implementation of pollutant reduction and control measures at industrial and commercial facilities, with the intent of attempting to further reduce pollutants in stormwater runoff from the MS4 to the MEP standard. The pollutant reduction and control measures used include source control BMPs, and operational and maintenance procedures. The objective of the Industrial/Commercial Facilities Control Program was to track, inspect, and ensure compliance at industrial and commercial facilities that are labeled "critical sources" of pollutants under the 2001 Permit. The Industrial/Commercial Facilities Control Program, however, is one of the programs in the 2001 Permit which remains subject to legal challenge, and is a program which the City is not proposing to continue to maintain in the renewed permit.

Any inspection obligations in exceedance of federal regulations constitute a State mandate and should be funded by the Regional Board in accordance with the precepts

set forth in Article XIII, section 6 of the California Constitution. The Regional Board shall consider the economic impacts of mandating Permit requirements that exceed federal regulations. The federal regulations only require Permittees to have a program to monitor and control pollutants in stormwater discharges from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and industrial facilities that the municipalities determine are contributing a substantial pollutant loading to the MS4. The City objects to any further requirement being included in the renewed Permit.

Under the 2001 Permit, Permittees developed and maintained databases for facilities within their own jurisdictions identified as critical sources of stormwater pollution in the 2001 Permit. The "critical sources" tracked under the 2001 Permit are summarized below:

- Restaurants;
- Automotive service facilities;
- Retail gasoline outlets (RGO's) and automotive dealerships;
- U.S. EPA Phase I Facilities (Tier 1 and 2);
- Other Federally-mandated Facilities [as specified in 40 CFR 122.26(d)(2)(iv)(C)];
- Municipal landfills;
- Hazardous waste treatment, disposal, and recovery facilities;
- Facilities subject to SARA Title III (also known as EPCRA).

The 2001 Permittees collected information and updated on a regular basis an inventory of critical sources. Permittees collected the following information for each industrial and commercial facility:

- Name of facility and name of owner/operator;
- Address;
- Coverage under the GIASP or other individual or general NPDES permits;
- A narrative description including SIC codes that best reflects the industrial activities and principal products at each facility.

The County reported that the first round of inspections under the 2001 Permit, for the critical source facilities identified above, were completed by August 1, 2004, and that inspections are currently underway for the second round under the 2001 Permit, and

are expected to be completed by Fall 2006. The critical source facilities under the 2001 Permit received educational materials on storm water pollution prevention practices and were inspected to ensure that the facility:

- Does not pour oil and grease or oil and grease residue onto a parking lot, street or adjacent catch basin;
- Keeps trash bin areas clean and trash bin lids closed, and does not fill trash bins with washout water or any other liquid;
- Does not allow illicit discharges, such as discharge of washwater from floormats, floors, porches, parking lots, alleys, sidewalks and street areas (in the immediate vicinity of the establishment), filters or garbage/trash containers;
- Removes food waste, rubbish or other materials from parking lot areas in a sanitary manner that does not create a nuisance or discharge to the storm drain.
- Maintains the facility area so that it is clean and dry and without evidence of excessive staining;
- Implements housekeeping BMPs to prevent spills and leaks;
- Properly discharges wastewaters to a sanitary sewer and/or contains wastewaters for transfer to a legal point of disposal;
- Is aware of the prohibition on discharge of non-stormwater to the storm drain;
- Properly manages raw and waste materials including proper disposal of hazardous waste;
- Protects outdoor work and storage areas to prevent contact of pollutants with rainfall and runoff;
- Labels, inspects, and routinely cleans storm drain inlets that are located on the facility's property;
- Trains employees to implement stormwater pollution prevention practices.
- Routinely sweeps fuel-dispensing areas for removal of litter and debris, and keeps rags and absorbents ready for use in case of leaks and spills;
- Is aware that washdown of facility area to the storm drain is prohibited;
- Is aware of design flaws (such as poor grading or inadequate roof covers and berms), and that appropriate BMPs are implemented;

- Inspects and cleans storm drain inlets and catch basins within each facility's boundaries no later than October 1st of each year;
- For service stations, post signs close to fuel dispensers, which warn vehicle owners/operators against "topping off" of vehicle fuel tanks, and the use of automatic shut-off dispenser nozzles;
- Routinely checks outdoor waste receptacle and air/water supply areas, cleans leaks and drips, and ensures that only watertight waste receptacles are used and that lids are closed; and
- Trains employees to properly manage hazardous materials and wastes as well as to implement other stormwater pollution prevention practices.
- Has, if needed, a current Waste Discharge Identification (WDID) number for facilities discharging stormwater associated with industrial activity, and that a Storm Water Pollution Prevention Plan is available on-site, and is effectively implementing BMPs in compliance with Los Angeles County Code, Regional Board Resolution 98-08, and the SQMP.

While Permittees were not required to inspect facilities under the 2001 NPDES Permit that had been inspected by the Regional Board within 24 months, the Principal Permittee found it difficult to schedule inspections in advance without timely and detailed information posted on the Regional Board's website on facilities they have or are scheduled to inspect. The information provided on the website was not specific enough to the Municipal Permittees, and specifically for the unincorporated areas of the County of Los Angeles. The Regional Board's spreadsheet of industrial facilities inspected (see http://www.waterboards.ca.gov/rwqcb4/html/programs/stormwater/sw_inspections.html) does not provide detailed enough jurisdictional information with respect to the unincorporated areas of Los Angeles County.

More specific and complete information is needed from the Regional Board during this next permit cycle to avoid redundant inspections of facilities which the City determines to inspect, and to avoid a waste of public resources. The 2001 Permittees ensured compliance of industrial/commercial facilities that are labeled "critical sources," under the 2001 NPDES Permit, by requiring BMP implementation. The County reports that various inspections resulted in additional BMPs being required of industrial/commercial facilities. Most of the BMPs required were to address issues involving operations that were exposed to stormwater, washing operations and trash/litter management.

The 2001 Permittees participated in various task forces, including the Los Angeles County District Attorney Strike Force, the City of Los Angeles Strike Force and the Federal Los Angeles Environmental Group Strike Force, and worked closely with the Regional Board and other Permittees to resolve stormwater related violations and other issues.

Under the 2001 Permit, the Los Angeles County Department of Public Works Environmental Programs Division was the lead agency to implement pollutant reduction and control measures through inspections of industrial and commercial facilities within the unincorporated areas of Los Angeles County. The County reports that 3,743 facilities in the unincorporated areas were inspected in the first round and that approximately 15% of all sites resulted in BMPs being required to address stormwater related pollution. Less than 1% of all facilities were referred to the Regional Board for violations.

As part of other mandates imposed on the 2001 Permittees, inspections of critical source facilities with underground storage tanks (in the unincorporated areas and 74 Permittee Cities) and/or with industrial waste permits (in the unincorporated areas and in 38 Permittee Cities) were conducted on a regular basis, to require compliance with stormwater regulations and requirements of the industrial/commercial facilities control program during each inspection.

The Industrial/Commercial Facilities Control Program was designed to meet the objectives of the 2001 NPDES Permit. The 2001 Permittee worked hard to comply with the requirements of the Industrial/Commercial Facilities Control Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by the 2001 Permittees.

3.4 DEVELOPMENT PLANNING

Under the 2001 Permit, the Permittees implemented a Development Planning Program that included compliance with the Standard Urban Stormwater Mitigation Plan (SUSMP) described in the 2001 Permit. However, the SUSMP Program in the 2001 Permit remains subject to legal challenge, and the City is not proposing the continued application of the SUSMP Program for the next permit cycle.

In general, as required by the 2001 Permit, Permittees developed and made the SUSMP guidelines available to developers, even though the SUSMP provisions were being challenged. Applicable projects have been conditioned to meet the SUSMP requirements prior to a new Permit being issued.

The County developed a technical manual for siting and design of BMPs for the development community. The various types of structural BMPs the 2001 Permittees required developers to incorporate into their projects, included: catch basin inserts; hydrodynamic devices; vortex separators; biofilters; on-site clarifiers; vegetative swales; perforated pipes in rock filled trenches; and detention basins.

The Development Planning Program was designed to meet the objectives of the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by the 2001 Permittees to comply with the 2001 Permit SUSMP Program.

3.5 DEVELOPMENT CONSTRUCTION

Any inspection obligations in exceedance of federal regulations constitute a State mandate and should be funded by the Regional Board in accordance with the precepts set forth in Article XIII, section 6 of the California Constitution. The Regional Board shall consider the economic impacts of mandating Permit requirements that exceed federal regulations. The federal regulations do not require Permittees to inspect the broad scope of construction sites required by the 2001 NPDES Permit. The City continues to reserve its objections to any inspection program that goes beyond that required by the federal regulations.

Pursuant to the 2001 NPDES Permit, the 2001 Permittees implemented a Development Construction Program to control runoff from construction activity at all construction sites within their jurisdictions. Construction projects were adequately reviewed for compliance with the NPDES Permit, which included the development of Storm Water Pollution Prevention Plans (SWPPP) and compliance with the SUSMP requirements of the 2001 NPDES Permit. As necessary, enforcement actions were taken against construction sites in violation of Permit requirements. It is important to recognize that certain aspects of the construction program remain subject to a legal challenge by a number of the 2001 Permittees, and by the Construction Industry Coalition on Water Quality ("CICWQ") and the Building Industry Legal Defense Foundation. These challenged portions of this program are therefore not being proposed for the next permit cycle.

To better implement the Development Construction Program for the 2001 Permit, the 2001 Principal Permittee placed materials clarifying the requirements of the Development Construction Program on its website and developed a brochure on Water Quality Regulations which is provided to the public with building permits issued by the County's Building and Safety Division.

The Development Construction Program was designed to meet the objectives of the 2001 NPDES Permit. Permittees worked hard to comply with the requirements of the Development Construction Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by the 2001 Permittees.

3.6 PUBLIC AGENCY ACTIVITIES

The Public Agency Activities Program under the 2001 Permit has been fully implemented by the Permittees. An inspection program for public facilities is in place to ensure field yards are implementing recommended BMPs. The most noted success of the Public Agency Activities Program is greater awareness among the County and Cities' staff members of stormwater issues. The 2001 Permittees, in cooperation with the County Sanitation Districts of Los Angeles, completed the Treatment Feasibility Study. This study investigated the possible diversion of dry weather discharges or the use of alternative treatment control BMPs to treat flows that may impact public health and safety and/or the environment. Other program successes include increased cleanout of problem catch basins and street sweeping, proper coverage of trash

receptacles and storage bins for potential pollutants, proper implementation of BMPs on public construction sites, installation of pervious pavement in parking lots and drainage swales to increase filtration, and equipped facilities with clarifiers for vehicle washing.

Notable improvements under the 2001 Permit as a result of the Public Agency Activities Program were:

- Increased staff awareness;
- Decreased potential for pollutant runoff from Public Facilities; and
- Upgraded fuel systems at maintenance yards with features that meet and exceed the requirements of the Permit. Some features include: utilizing aboveground storage tanks, secondary containment berms, canopies which extend over the concrete fuel pad, and fuel pads graded to prevent sheet flow.

The Public Agency Activities Program was designed to meet the objectives of the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by the 2001 Permittees.

3.7 ILLICIT CONNECTIONS/ILLICIT DISCHARGES ELIMINATION

Under the 2001 Permit, the Permittees have increased public awareness of the impacts of illicit connections and illicit discharges. The Public Hotline (1-888-CLEAN-LA) continues to effectively manage the receiving, tracking, and reporting of public complaints. For some of the 2001 Permittees, Closed Circuit TV monitoring was employed to screen for illicit connections, and for others, field screenings have been conducted.

Noteworthy improvements to the Illicit Connections/Illicit Discharges Program include:

- Improved inter-agency coordination;
- Prompt response to reported illicit discharges;
- Increased public and City staff awareness; and
- Increased public reporting

The Illicit Connections/Illicit Discharges Elimination Program was designed to meet the objectives of the 2001 NPDES Permit. The 2001 Permittees worked hard to comply with the requirements of the Illicit Connections/Illicit Discharges Elimination Program under the 2001 NPDES Permit. Please see Appendix A for some specific examples provided by the 2001 Permittees.

4.0 PRIORITIES FOR PROGRAM IMPROVEMENT

Municipal stormwater and urban runoff management programs in the Los Angeles region were initiated with the June 18, 1990 adoption of Order No. 90-079. A revised Municipal NPDES Permit was issued in July 1996, and another in December 2001

(Order No. 01-182.) The 2001 Permittees currently find themselves near the end of this third Permit cycle and have conducted in-depth reviews of their current management programs with an eye toward continued improvement. As public agencies, the 2001 Permittees have an obligation to responsibly manage public funds as well as to protect the quality of the environmental resources within their jurisdictions. In addition, Permittees' citizens live and work in the Los Angeles region, and Permittees recognize that managing the impacts of stormwater and urban runoff in a cost effective manner is in the best interest of all their residents.

The 2001 Permittees implemented programs that meet and often exceed the basic provisions of the existing Permit, but understand that continued progress requires program approaches that are strategic, beneficial, measurable, cost-effective, adaptive, and fiscally responsible.

The remainder of this document provides a more in-depth discussion of specific priorities and the proposed Permit programs for the renewed NPDES Permit. Any 2001 NPDES Permit program not identified in the ROWD as being a part of the renewed permit has been excluded from the renewed permit terms, and has not be carried over into the proposed permit's terms, for either legal, practical or cost reasons. Again, it should be noted that many of the 2001 Permit terms remain subject to legal challenge, and that, as such, the City has not included various portions of the 2001 NPDES Permit which it has contended are contrary to State and/or federal law, and/or are otherwise arbitrary and capricious.

4.1 PROGRAM COMPONENTS

Recommended improvements for the next Permit cycle would be to streamline specific requirements, eliminate other requirements, provide the City with a safe harbor provision, maintain steady implementation of programs that have not been challenged and that have been proven to work well, and make results-based modifications to other programs to better utilize limited resources. Components in each of the programs have been identified as requiring some modification to improve the overall intent of the Permit, which is to develop, achieve, and implement a timely, comprehensive, cost-effective stormwater pollution control program to reduce the discharge of pollutants in stormwater from the MS4 to the MEP standard and consistent with the reasonableness standards under State Law.

4.2 PRIORITY 1 – RECOMMENDED LANGUAGE FOR RECEIVING WATER LIMITATIONS INCLUDING FINDINGS OF FACT, SAFE HARBOR PROVISION, AND DEFINITIONS

The Receiving Water Limitations language in Order No. 01-182 is another section of the 2001 Permit that is the subject of the pending legal challenge. The City recommends that the Permit contain Receiving Water Limitations language which is consistent with applicable law and with which the City can comply. Order No. 96-054, the 1996 NPDES Permit, included language which stated "Timely and complete implementation by a Permittee of the storm water management programs prescribed in this Order shall

satisfy the requirements of this section and constitute compliance with receiving water limitations.” It further provided that where an exceedance of a water quality objective had occurred, that the Permittees were to submit stormwater programs that “will increase the likelihood of preventing future exceedances of water quality objectives.” This language was subsequently omitted by the Regional Board in Order No. 01-182. It is imperative that the City have the support of the Regional Board when making a good faith effort to comply with Permit requirements, and that the City not be required to implement BMPs that go beyond the MEP or reasonableness standards under federal and state law.

Permittees, as municipalities, should not be required to strictly comply with water quality standards/objectives. Rather, compliance with such standards should be limited to compliance through the use of reasonable and cost-effective MEP-compliant BMPs. Forcing the City to be in a never-ending state of non-compliance, and requiring it to strictly comply with water quality standards/objectives that are not reasonably achievable or practicable, is arbitrary and capricious, and contrary to law. Further, exposing the City to immediate third party lawsuits is unproductive, discourages collaborative working relationships with non-governmental organizations, and does not achieve the primary goal of improving water quality.

The following are proposed Findings of Fact, suggested Receiving Water Limitations language and Definitions for the renewed permit:

Findings of Fact:

1. *Urban Runoff includes discharges from residential, industrial, commercial, and construction areas within the Permit Area. In addition to Urban Runoff, the MS4s regulated by this order receive flows from agricultural activities, open space, state and federal properties and facilities, schools, colleges and universities, and other land uses not under the control of the Permittee.*

2. *The Permittee lacks legal jurisdiction over discharges into their respective MS4s from agricultural activities, California and federal properties and facilities, school districts, colleges and universities, utilities and special districts, wastewater management agencies, and other point and non-point source discharges otherwise permitted by or under the jurisdiction of the Regional Board. The Regional Board recognizes that the Permittee should not be held legally responsible for any discharges or pollutants, either in storm water or non-storm water, running off of any such property or facility. Similarly, certain activities that generate pollutants present in Urban Runoff are beyond the control or the authority of the Permittee to regulate. Examples of these include but are not limited to the operation of internal combustion engines, atmospheric deposition, brake pad wear, tire wear, residues from application of pesticides, nutrient runoff from agricultural activities, and background conditions (e.g. wildlife, and leaching of naturally occurring minerals, metals, and other elements from local geology).*

3. *The Regional Board finds that the unique aspects of the regulation of Urban Runoff discharges through MS4s, including but not limited to the intermittent nature of*

discharges, and difficulties in monitoring and limited physical control over the discharges, will require adequate time and resources to determine what persons or entities are responsible for reducing the discharge of pollutants in Urban Runoff discharged from the MS4.

Receiving Water Limitations:

1. The Permittee shall implement BMPs to attempt to reduce the discharge of pollutants in Urban Runoff discharged from the Permittees' MS4s, where such Urban Runoff causes or contributes to an exceedance of water quality standards and objectives.

2. The Permittee shall comply with Paragraph 1 above through the use of reasonable and cost-effective MEP-compliant BMPs. The BMPs shall be designed taking into consideration those water quality standards and objectives that are reasonably required to ensure the reasonable protection of properly designated beneficial uses. Only water quality standards/objectives which can reasonably be achieved need to be complied with by the Permittee, and only after the Regional Board has considered: (a) the past, present, and probably beneficial uses of the receiving water; (b) the environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto; (c) the water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area; (d) economic considerations; (e) the need for developing housing in the region; and (f) the need to develop and use recycled water. In determining whether any particular water quality standard or objective must be complied with by a Permittee, in addition to the above, the Regional Board shall further consider all demands being made and to be made on the subject waters, and the total values involved, beneficial and detrimental, economic and social, tangible and intangible. Compliance with applicable water quality standards and objectives is to occur through an iterative BMP process, consistent with the provisions of this paragraph.

3. If an exceedance of a water quality standard/objective is due to or believed to be due to discharges to the MS4 that are outside the Permittees jurisdiction or control, the Permittee shall advise the Executive Officer of such in writing and thereafter need not implement BMPs to address such an exceedance.

4. If the Permittee has acted reasonably and in good faith in complying with the procedure set forth above, and are implementing the revised SQMP, the Permittee does not have to repeat the same procedure for continuing or recurring exceedances of the same water quality standards/objectives, unless the Executive Officer determines that additional BMPs, consistent with Section 2 above, should be implemented to comply with applicable water quality standards/objectives, and provides written notice to the Permittee of this determination and the basis for the determination.

5. Reasonable and good faith compliance with the procedures set forth in this section shall satisfy the requirements of this Order and shall constitute compliance with applicable water quality standards/objectives.

Definitions:

1. "Maximum Extent Practicable" or "MEP" is the standard established by Congress in Clean Water Act section 402(p)(3)(B)(iii) that municipal dischargers of storm water MS4s must meet. For the purpose of this Order, MEP is generally, but not necessarily, less stringent than best available control technology, the standard which industrial dischargers of storm water must meet. MEP generally emphasizes pollution prevention and source control and includes consideration of technical feasibility, practicability, cost effectiveness, benefits derived, regulatory compliance and public acceptance. Where cumulative cost exceeds cumulative benefits, a program or BMP is not considered practicable.

2. "Urban Runoff" is that water discharged to the MS4 for which the Permittees are responsible when further discharged from the MS4 to receiving waters. Urban Runoff includes discharges from residential, industrial, commercial, and construction areas (that are not governed by a State issued NPDES Permit) within the Permit area, but the term "Urban Runoff" expressly excludes storm water and non-storm water discharges from agricultural activities, State-permitted industrial activities or construction sites, open space, State and federal properties and facilities, school district properties, colleges and universities, waste water management agencies, other NPDES-permitted discharges, and other point and non-point source discharges that are not subject to regulation by the Permittee.

4.3 PRIORITY 2 – FUNCTION OF WATERSHED MANAGEMENT COMMITTEES

Order No. 01-182 requires Watershed Management Committees (WMCs) to carry out specific responsibilities as a group. These responsibilities included:

- a. Facilitate cooperation and exchange of information among Permittees;
- b. Establish goals and objectives and associated deadlines for the WMA, as the program implementation progresses;
- c. Prioritize pollution control efforts based on beneficial use impairment(s), watershed characteristics and analysis of results from studies and the monitoring program;
- d. Develop and/or update and monitor the adequate implementation, on an annual basis, of the tasks identified for the WMA;
- e. Assess the effectiveness of, prepare revisions for, and recommend appropriate changes to the SQMP and its components;
- f. Continue to prioritize the Industrial/Commercial critical sources for investigation, outreach and follow-up; and
- g. Meet four times per year and, as necessary.

The City's resources are limited. Requiring the City to perform additional tasks under the WMCs is extremely difficult because it takes valuable resources away from working on other Permit requirements that have a more significant impact on water quality.

The City believes it is important for key personnel within a WMA to meet on a quarterly basis to facilitate cooperation when implementing stormwater programs and to exchange experiences and information that may be of value. However, the City recommends having the flexibility to independently determine how to implement its Permit programs in the manner that best suits it, whether that be individually or as a WMA. The City recommends that the WMC meeting structure be combined with the impaired water body jurisdictional groups to form one joint meeting since many of the same Permittee representatives are handling both obligations. This recommendation would reduce the need for parallel meetings that are unnecessary. WMAs are redundant since Permittees will be forced into watershed-based relationships as a result of impaired water bodies.

4.4 PRIORITY 3 – INDUSTRIAL AND COMMERCIAL FACILITIES CONTROL PROGRAM IMPROVEMENTS

Pursuant to the 2001 NPDES Permit, Permittees were required to track, inspect, and ensure compliance at industrial and commercial facilities that the Regional Board has asserted are critical sources of pollutants in stormwater. These provisions in Order No. 01-182 are presently being challenged by many of the 2001 Permittees in the pending legal challenge.

The City proposes that the so-called "Critical Sources" referenced in the 2001 Permit, such as commercial facilities (restaurants, automotive service facilities, retail gasoline outlets and automotive dealerships), and Phase I Facilities (both Tier 1 and 2), not be inspected under the renewed permit, unless the City first determines that the facility is an industrial facility that is contributing a substantial pollutant load to the MS4.

There is no authority under State or federal law for requiring the City to inspect commercial facilities, such as restaurants, gasoline service stations, or automobile dealerships or any other commercial facilities. For industrial facilities, the federal regulations leave it to the Permittee to determine which facilities to inspect, and when, and provide for the inspection of those industrial facilities which the Permittee determines are contributing a substantial pollutant load to the MS4. Accordingly, the City requests that the existing Industrial and Commercial Facility Control Program requirements under Order No. 01-182 be deleted from the Permit, and replaced with language which provides the City the discretion to inspect those industrial facilities it determines are contributing a substantial pollutant load to the MS4.

Also, the 2001 Permittees found it unnecessary and a waste of resources to repeatedly inspect facilities that are found to be in compliance with the General Industrial Activities Stormwater Permit (GIASP). A much more effective inspection strategy would be to repeatedly target industrial facilities that are not in compliance and where the Permittee determines the industrial facility has contributed a substantial pollutant load to the MS4.

Moreover, for those industrial facilities the City determines to inspect, the City recommends that the Annual GIASP inspection fees collected by the State Water Resources Control Board be distributed to the City for conducting such industrial facility inspections. This would encourage and assist the City and other Permittees in making such inspections, and would avoid private industry from either paying two inspection fees for a single inspection, or being subject to redundant inspections. In addition to the legal objections to the inspection program in Order No. 01-182, financial constraints make it difficult for the City to carry out the level of inspections required under Order No. 01-182. Providing local agencies with sufficient monetary resources will facilitate more inspections by the City.

4.5 PRIORITY 4 – PEAK FLOW CONTROL AND STANDARD URBAN STORMWATER MITIGATION PLAN (SUSMP)

The City proposes that the Development Planning Program provisions as contained in Order No. 01-182 be deleted and not carried forward into the next permit. Again, these provisions under Order No. 01-182 are being challenged by many of the 2001 Permittees, as the State and Regional Boards are without authority to impose these provisions, and as such program provisions are inconsistent with state and/or federal law.

Continuing to require compliance with the SUSMP provisions, is to require compliance with a particular design criteria or other particular manner of compliance, which is contrary to the prohibition under California Water Code section 13360. In addition, continuing to require compliance with the SUSMP provisions, and to compel municipalities to impose certain mitigation measures to mitigate undefined impacts from runoff from numerous "development" and "redevelopment" projects, irrespective of what mitigation measures may or may not be properly required under CEQA and the review process set forth therein, is arbitrary action that is contrary to law, and the Regional and State Boards lack the authority to impose any such requirements.

In addition, the Peak Flow Control provisions included in the 2001 Municipal NPDES Permit are in excess of the Regional and State Boards' authority, and are contrary to law, as neither the Clean Water Act, nor the Porter-Cologne Act, authorizes the State to regulate the "quantity" of storm water or urban runoff.

Finally, the State and Regional Boards should consider the impacts that the Development Planning Program provisions will have on the development of low income/affordable housing as required under Water Code sections 13241(e) and 13263.

4.6 PRIORITY 5 – SPECIFIC BMP REQUIREMENTS

Under Order No. 01-182, all Permittees were required to place and maintain trash receptacles at all transit stops within their jurisdiction. Prescriptive requirements such as this limit the ability of Permittees to analyze and determine the cost effectiveness and appropriateness of BMPs to address pollutants of concern in discharges from their MS4. They are further contrary to law. (See, e.g., Water Code § 13360.)

It is recommended that the City be given the flexibility to select suitable BMPs and their respective locations, to address pollutants of concern. The City also recommends that the explicit requirement to place and maintain trash receptacles at all transit stops be removed from the Permit, as it is presently the subject of the legal challenge to Order No. 01-182. Moreover, any such mandates to be imposed upon the City may only be imposed, under the California Constitution, if appropriate funds have been provided to the Permittees to fund the mandate.

4.7 PRIORITY 6 – STORM WATER POLLUTION PREVENTION PLANS (SWPPP) REDUNDANCY

The General Construction Activities Stormwater Permit (GCASP), Order No. 99-08-DWQ, requires all dischargers, where construction activities disturb one or more acres, to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), eliminate or reduce non-stormwater discharges to storm drain systems and other waters of the nation, and perform inspections of all BMPs. Requiring a Local SWPPP to substitute for a State SWPPP is redundant, and is the subject of the legal challenge to Order No. 01-182. The requirement for a Local SWPPP should be deleted and is not being proposed to be carried forward in the next permit cycle.

The City also proposes that the Development Construction Program requirements as set forth under Order No. 01-182, be modified in the renewed permit so that the City not be required to impose "minimum" unreasonable requirements on construction sites, such as unreasonable restrictions on the discharge of sediment or construction related material (including sand, gravel and other natural material) that may runoff from a construction site. This concern is also the subject of the pending legal challenge.

4.8 PRIORITY 7 – ILLICIT CONNECTION/ILLICIT DISCHARGE ELIMINATION PROGRAM IMPROVEMENTS

The 2001 Permittees are required to eliminate all illicit connections and illicit discharges to the storm drain system, and to document, track, and report all occurrences. The Permit requires the field screening of open channels, underground pipes, and underground pipes with a diameter of 36 inches or greater by specific dates. Based on an annual evaluation of patterns and trends of illicit connections and illicit discharges, it can be concluded that the following land use types contributed an average of 62.2% of all illicit connections and 81.5% of all illicit discharges discovered:

- High Density Single Family Residential
- Retail and Commercial
- Light Industrial
- Multiple Family Residential

- Transportation

The City recommends that in coordination with the County, field screening be concentrated in the five land use types above to maximize resources and target the areas where most illicit connections and illicit discharges are currently found. It is recommended that field screening in other land use types be optional since the City's resources are limited.

The City recommends that the term "illicit disposal" be removed from the definitions section of the Permit since it serves no purpose and is not used in the Permit. Other definitions need to be more explicitly defined to establish consistent implementation and reporting by Permittees. The definition for "illicit discharge" should be revised to read, "means any discharge to a constructed storm drain system, excluding streets and gutters, that is prohibited under local, state, ..." This revised definition will clearly identify an illicit discharge as a non-stormwater discharge that has entered a constructed storm drain system. The 2001 Permittees do not consider a spill or discharge that is only in the gutter or roadway as being an illicit discharge since these types of incidents are typically handled immediately and never reach the receiving waters. Similarly, the definition for "illicit connection" should be revised to read, "any unpermitted connection which may allow an illicit discharge to enter a constructed storm drain system, excluding streets and gutters,..."

4.9 PRIORITY 8 – PERMIT FORMAT

The City finds the format of the 2001 Permit difficult to follow. The City recommends that the Regional Board also include tables and matrices to assist the City with Permit requirements, expectations, and submittal deadlines.

4.10 PRIORITY 9 – PERMIT IMPLEMENTATION COSTS

Many Permittees in the 2001 Permit had to budget and divert earmarked money from other municipal requirements to meet the obligations of the 2001 NPDES Permit. The City is concerned about the year-to-year increase in program implementation costs to meet what are believed to be unreasonable programs that are not cost/effective, and do not foresee new revenue streams to help bridge the gap between Permit compliance and other municipal programs. The Regional Board should not overlook the lack of adequate resources to implement the requirements of the Permit. Consideration should be given to developing and implementing program requirements that target the largest and most frequent sources of stormwater pollution, and that utilize the City's resources prudently so as not to exhaust them beyond reasonable means. Some 2001 Permittees have cited examples such as excessive industrial and commercial facility inspections, as required by the 2001 Permit, as having detracted resources from their illicit connection and illicit discharge field-screening program.

4.11 PRIORITY 10 – DISCHARGE EXEMPTION REFERENCE

The City proposes to continue with the same program set forth under the 2001 Permit for prohibiting non-stormwater discharges (Part 1 of the 2001 Permit), except that the discharge exemption for potable drinking water supply and distribution system reference to American Water Works Association (AWWA) guidelines for dechlorination and suspended solids reduction practices, should be deleted. The City has determined that these AWWA guidelines do not exist. Therefore, it is recommended that the AWWA reference be removed from the new permit.

4.12 PRIORITY 11 – LEGAL AUTHORITY

The task of amending or adopting a Permittee-specific stormwater and urban runoff ordinance to enforce all requirements of the Permit takes a significant amount of time to complete. It is recommended that the Boards provide the City a minimum of 12 months from the date of Permit adoption to complete all necessary changes to possess adequate legal authority to comply with the new Permit.

4.13 PRIORITY 12 – ANNUAL REPORT ENHANCEMENTS

The City recommends streamlining the Municipal Stormwater Permit Annual Report to only require the reporting of significant records that demonstrate BMP effectiveness and compliance with the implementation of SQMP components to reduce the discharges of pollutants in stormwater from the MS4, in accordance with the MEP and reasonableness standards under federal and state law. Redundant requirements such as the preparation of an assessment of the effectiveness of SQMP requirements to reduce stormwater pollution which evaluates watershed-wide assessments conducted by each WMC is unnecessary and a waste of resources.

The County reported that many 2001 Permittees had difficulties in submitting Annual Reports by the October 15th deadline. Problems exist with the short timeframe that Permittees are given between the end of the fiscal year (typically June 30) and meeting the deadline for submitting Annual Reports to the Principal Permittee so that data can be compiled and summarized by the 2001 Principal Permittee for submittal by October 15th. The City recommends changing the Annual Report deadline from October 15th to November 15th of each year.

The 2001 Permittees considered some information required for the Annual Report to be irrelevant to achieving the goals of the Permit. For this reason and because of proposed deletions and changes to the 2001 Permit, it is recommended that the following Annual Report questions be eliminated:

- Section IV.C.7 — How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- Section IV.C.8 — What is the percentage of total development projects that were conditioned to meet SUSMP requirements?

- Section IV.D.5 — How many building/grading permits were issued to sites requiring Local SWPPPs last year?
- Section IV.D.6 — How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Stormwater Permit last year?
- Section IV.D.7 — How many building/grading permits were issued to construction sites less than one acre in size last year?

The following Annual Report tables should be modified to eliminate confusion and improve the quality of data submitted:

- Section IV.F.10 — Delete and replace with the following illicit connections table:

Number of Suspected Illicit Connections Reported	Number of Suspected Illicit Connections Investigated	Number of Illicit Connections Terminated	Number of Suspected Illicit Connections found not to be Illicit	Number of Suspected Illicit Connections that resulted in Enforcement Action

- Section IV.F.13 — Delete and replace with the following illicit discharges table:

Number of Suspected Illicit Discharges Reported	Number of Suspected Illicit Discharges Investigated	Number of Illicit Discharges Terminated	Number of Suspected Illicit Discharges found not to be Illicit	Number of Suspected Illicit Discharges that resulted in Enforcement Action

4.14 PRIORITY 13 – PUBLIC INFORMATION AND PARTICIPATION ENHANCEMENT

The County has recommended the requirement of a minimum of 35 million impressions per year on the general public concerning stormwater quality via print, local TV access, local radio, or other appropriate media be deleted from the next permit cycle . The County believes a better process to quantify the effectiveness of a public information and participation program is to use a presumptive measurement approach. According to the County, this presumptive measurement approach will quantify a percent reduction or improvement in water quality as a result of implementing an integrated and cost-

effective public information and participation program. The City will participate with the County and will be relying on the County and its efforts in the renewed permit as compliance with the Public Information Program.

The County's program is a cost-effective program that reaches millions of households in the region. The City will also continue its own public education program of flyers, press releases and advertisements. In addition, the City will run 30-second video spots on the City's cable television station.

4.15 IMPLEMENTATION APPROACHES

The 2001 Permittees worked diligently to develop comprehensive watershed programs. Working across watershed boundaries with the other 2001 Permittees will require that the Permittees continue to collectively develop relationships, as well as standardized procedures to facilitate increased collaboration. This will increase the effectiveness of watershed programs being implemented. Permittees and the Regional Board must also increase their understanding of the scientific basis of water quality and pollution source control. Allowing for increased flexibility in the next permit is crucial to future successes. Adopting prescriptive and inflexible permit requirements would be premature and seriously undermine processes and commitments that have already been put into place. The Regional Board should not adopt new requirements until sufficient data has been collected so as to ensure success to a reasonable level of probability. The scientific data underlying all Regional Board decisions should be subject to peer review consistent with State and federal law.

Implementation approaches will be evaluated and amended to reflect Permit requirements and achieve the goal of implementing program components to reduce the discharges of pollutants in stormwater runoff from the MS4 to the MEP and reasonableness standards.

The City desires to make improvements to the surface water quality in the region. However, due to our small size (2.2 square miles) and small population (11,089), the City believes that the most cost-effective approach to permit compliance for the renewed permit will be to carry out Best Management Practice programs in our subwatersheds. The City is currently managing the Hamilton Bowl Trash Reduction Project, which includes the City of Long Beach, the County of Los Angeles and the State Water Board as funding partners. A Best Management Practices Effectiveness Report is required at the end of the trash reduction project.

This project was originally intended to construct, operate and test a series of trash catching devices in the Hamilton Bowl, a major runoff retention facility serving both Signal Hill and Long Beach. Signal Hill intends to expand the Hamilton Bowl project during the next permit cycle to complete a feasibility study of dry-weather diversion, injection well, sand filters or other Best Management Practice approaches. This feasibility study will assist the City in determining the most cost-effective approach to

dealing with dry-weather runoff from the subwatershed, and to establish a scope of work program and apply for grant funding.

4.16 TOTAL MAXIMUM DAILY LOAD (TMDL) IMPLEMENTATION PLANS

The CWA of 1972 require States to develop a list of impaired waters and the pollutants causing them to be impaired, also known as the 303(d) List. States must then establish a pollutant specific Total Maximum Daily Load (TMDL) for each listed water body for the particular pollutant causing the impairment. TMDLs are guides to be used in bringing impaired water bodies into compliance with water quality standards necessary to sustain their designated beneficial uses, and must be consistent with the State and federal law requirements applicable to the adoption and implementation of TMDLs. One of the objectives of this NPDES Permit is to protect the beneficial uses of receiving waters in Los Angeles County by reducing the discharge of pollutants in stormwater from the MS4 to the MEP and reasonableness standards through an iterative BMP approach.

Waste load allocations established by a valid TMDL are to be complied with through an implementation plan, which implementation plan is to be implemented through appropriate BMPs. The BMPs are adopted either as amendments to an NPDES Permit, or through other means, such as the adoption of waste discharge requirements ("WDRs"), or as proposed below, through a Memorandum of Understanding ("MOU") between the Boards and the affected dischargers. TMDLs to be applied to municipal discharges should, therefore, be implemented through the subsequent adoption by the Boards of either separate MOUs or WDRs which delineate the reasonable and cost-effective MEP-compliant BMPs to be undertaken.

US EPA has stated that TMDLs can be implemented through a variety of mechanisms, even voluntary agreements. The City proposes that TMDL's be implemented through Memorandums of Understanding (MOUs) between the State and Regional Boards and the City. The City believes that implementing TMDLs through the NPDES Permits is not the correct or desirable approach. Requiring strict compliance with numeric limits in a TMDL by incorporation of the waste load allocations into the NPDES Permits would subject the City to potential daily fines of \$31,500 and on-going third-party litigation. The City is already struggling to fund water quality programs and is anticipating additional expenses as more and more TMDLs are adopted.

A more equitable method of enforcement is an agreement between the Regional Board and the City to implement Supplemental Environmental Programs (SEPs). The MOU's could specify that SEPs are the preferred alternative for non-compliance, since they would consist of programs designed to enhance the beneficial uses in the general vicinity of any violation, instead of fines to be paid to other accounts, such as the State Cleanup and Abatement Account. The MOU's could specify that the City would be

required to complete special studies, pollution prevention, pollution reduction, environmental restoration, environmental auditing and increased public education.

The City thus recommends an MOU between the State and Regional Boards and responsible agencies be adopted in lieu of including TMDLs in the NPDES Permit. The TMDLs applicable to the City would then be implemented through the adoption of separate MOUs setting forth reasonable and cost-effective BMPs. Such MOUs should provide that good faith compliance and implementation of the BMPs set forth in the developed Implementation Plan would constitute compliance with the adopted TMDLs. The use of MOUs is authorized by the Water Quality Control Policy for Addressing Impaired Waters: Regulatory Structure and Options, adopted by State Board Resolution No. 2005-0050 (June 16, 2005). The effluent limitations in the Permit itself should be expressed as BMPs. See EPA Memorandum, Establishing Total Maximum Daily Load (TMDL) Waste Load Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs (November 22, 2002), p.4.

All BMPs proposed to be implemented to meet a TMDL's waste load allocation(s), should, moreover, be in accordance with the MEP and reasonableness requirements of federal and State law, and particularly the requirement that the City only be required to comply with those water quality standards/objectives which are "reasonably achievable," taking into account economic considerations, impacts on housing within the region, the past, present and probable future beneficial uses of the water, the environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto, and the total values involved, beneficial and detrimental, economic and social, tangible and intangible.

As set forth in a November 22, 2002 EPA Guidance Memorandum ("EPA Guidance Memo"), EPA determined that where a TMDL is developed for stormwater discharges: "because stormwater discharges are due to storm events that are highly variable in frequency and duration and are not easily characterized, only in rare cases will it be feasible or appropriate to establish numeric limits for municipal and small construction stormwater discharges." EPA further found that:

Under certain circumstances, BMPs are an appropriate form of effluent limits to control pollutants in storm water. See 40 C.F.R. § 122.44(k)(2) & (3). If it is determined that a BMP approach (including an iterative BMP approach) is appropriate to meet the storm water component of the TMDL, EPA recommends that the TMDL reflect this. (*Id.* at p. 5 of EPA's Guidance Memo.)

5.0 WATER QUALITY MONITORING

The 2001 Permit provides that the results of the monitoring program should be used to "refine the SQMP for the reduction of pollutant loadings and the protection and enhancement of the beneficial uses of the receiving waters in Los Angeles County." The Monitoring Program set forth in Order No. 01-182 was not developed based on a cost/benefit analysis, where the benefits of the program were examined in comparison

to its cost. As such, the Monitoring Program in the 2001 Permit is the subject of the pending legal challenge.

With respect to the renewed permit for the next permit cycle, as the City believes that the State and Regional Boards are required to conduct a cost/benefit analysis, as provided for under Water Code sections 13267(b), 13225(c), and 13165, before any monitoring and reporting program can be imposed upon the City, any monitoring and reporting program to be carried out in the next permit cycle should only be imposed upon the City after the State and Regional Boards have first conducted the requisite cost/benefit analyses, and thereafter, to the extent any such cost/benefit analyses shows the burdens of the monitoring or reporting program do not bear a reasonable relationship to the need for the program and the benefits to be attained therefrom, such program should not then be imposed upon the City. Nor should the City then be required to fund any such monitoring or reporting program.

Techniques to quantify the relationship between SQMP implementation and water quality are still in their infancy, and will mature through an iterative process over many Permit cycles. Under the County's Monitoring Program, resources are proposed to be shifted toward those studies and monitoring programs that allow for a better measure of SQMP effectiveness and that lead to a reduction in pollutant loadings from urban and storm water runoff.

The City of Signal Hill Monitoring Program is based upon the County's proposed sampling plan for Mass Emission Stations, as set forth in the County's proposed ROWD,. The City's Monitoring Program will consist of the following:

Executive Summary

- Samples will be collected from 3 storm events at four locations during each rainy season.
 - 2 samples will be collected at each station 4 hours apart. (recommended)
- Two samples will be collected at the same locations during the dry season.
- Samples will be collected manually.
- Water samples will be tested for 303(d) listed pollutants, past sampling "hits" and select GIASP parameters.
- Sampling points are prior to commingling with Long Beach or CalTrans runoff.

Sampling Frequency

Wet-Weather Monitoring Events

Three (3) wet-weather monitoring events will be conducted during each rain season. Monitoring will be conducted during the first rain event and two other events no closer than 30 day intervals. Two samples will be collected at each monitoring station. Samples will be collected at four (4) locations described in the section below entitled

Sampling Stations. The first samples at each sampling station will be collected within four (4) hours of the beginning of the rain event. The second series of samples will be collected approximately four (4) hours after the collection of the first samples. Due to natural variations in rainfall, all samples may not be able to be collected as scheduled and it is acknowledged that sample collection schedules may need to be modified during such times.

Dry-Weather Monitoring Events

Two (2) dry-weather monitoring events will be conducted during the dry-weather season. One sample will be collected at each of the four (4) monitoring stations. The samples will be collected during the dry-weather period of April 16th through October 31st. Samples shall be collected at intervals of no less than 60 days apart. Additionally, samples shall not be collected within three (3) days after any rainfall.

Sampling Parameters

Sample collections will be conducted in accordance with the U.S EPA sampling protocols. The City's sampling plan will test for the pollutants identified in the table below. Trip and sampling blanks will be used to verify proper handling procedures.

Pollutants

Tributary to Los Angeles River			Tributary to Los Cerritos Channel		
Oil and Grease			Oil and Grease		
Total	Suspended	Solids	Total	Suspended	Solids
(recommended)			(recommended)		
Specific Conductance (recommended)			Specific Conductance (recommended)		
pH			pH		
Hardness			Hardness		
Temperature (needed for metals tests)			Temperature (needed for metals tests)		
Residual Chlorine			Residual Chlorine		
Bacteria			Bacteria		
Fecal Coliform			Fecal Coliform		
Total Coliform			Total Coliform		
Enterococcus			Enterococcus		
Nutrients			Metals		
Nitrate N			Copper		
Nitrite N			Zinc		
PAHs			Lead		
Bis(2-ethylhexyl) phthalate					
4-metholphenol					
Metals					

Copper Zinc Lead Cadmium Aluminum Diazinon			
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Monitoring Stations

Los Angeles River Watershed

Outflow samples: There are six 6 major storm drain systems that convey runoff from the City of Signal Hill to the Los Angeles River. Two (2) of these systems convey runoff that is not blended with runoff originating in the City of Long Beach and ultimately drains into the Hamilton Bowl Detention Basin. Samples will be collected at the following locations:

1. The existing manhole at station 16+10 at Gundry Avenue at the Pacific Electric Railroad Right-of-way.
2. The existing manhole at station 1+81 near the intersection of Alamitos Avenue and Walnut Avenue.

Inflow samples: Due to the topographical nature of Signal Hill, there are no applicable lines within the Los Angeles River Watershed in Signal Hill with inflow from outside areas.

Los Cerritos Channel Watershed

Outflow samples: There are four (4) major storm drain systems that convey runoff from the City of Signal Hill, which ultimately flow into the Los Cerritos Channel. Each of these lines convey commingled runoff from the Cities of Long Beach and Signal Hill. Two storm drain lines can be sampled at locations where runoff originating in the City of Long Beach will have a reduced impact on the sample results. Samples will be collected from the following locations:

1. The existing manhole at station 3+82 in Cherry, just south of Spring Street.
2. A new manhole at the city boundary on California just south of Wardlow Road.

Inflow samples: Similarly to the areas draining to the Los Angeles River, the City of Signal Hill is essentially the "top of the hill" and there are no significant areas of inflow from outside jurisdictions. There is a substantial amount of commingled runoff in several storm drains within the Los Cerritos Channel watershed through numerous catch basins. Segregation of flows will be virtually impossible.

APPENDIX A – 2001 PERMITTEES' PROGRAM ACCOMPLISHMENTS

The 2001 Permittees worked hard to comply with the 2001 NPDES Permit requirements and in certain instances had gone above and beyond the Permit requirements. The following are some examples of accomplishments provided by the 2001 Permittees:

Public Information and Participation Program

- The Principal Permittee raised public awareness of stormwater pollution through the following efforts: Countywide media campaigns for the Stormwater Urban/Runoff and Used Motor Oil Recycling programs; the broadcast of pollution prevention public service announcements (PSAs) through the "4 Our Planet" media partnership with KNBC television station; and a partnership with the Heal the Bay and innovative K-12 environmental education programs. More than 153 million impressions were achieved.
- The Principal Permittee partnered with the Cities of the Malibu Creek Watershed to purchase "4 Our Planet" PSAs on KNBC television station targeting specific pollutants within the watershed.
- Principal Permittee ethnic outreach efforts included English, Spanish and Chinese campaigns to promote used motor oil and filter recycling and stormwater pollution prevention to a Black, Latino, and Chinese populations.
- Two community pilot projects, Florence Firestone and Union Pacific, were implemented to provide an opportunity for the general public, local business and community leaders to participate in a beautification event and facilitate the beginning of a long-term goal of keeping their communities clean by educating others about pollution prevention with the collateral materials and the knowledge they acquired from County Stormwater messages.
- Quarterly public outreach strategy meetings were organized and hosted annually by the Principal Permittee. Updates, information and materials were provided to the Permittees to improve and enhance their outreach efforts and keep them informed about the Countywide media campaign.
- Over 10 BMP workshops were held for corporate managers of restaurant chains and retail gas station chains to facilitate the proper handling and disposal of materials to divert them from entering the storm drain system. Approximately 145 restaurant managers and corporate staff attended the training workshops.
- The Principal Permittee continues to conduct environmental education programs developed to meet the educational needs of students enrolled in grades K-12 and will enhance curriculum assessment and tracking efforts through its partnership with the California Regional Environmental Education Consortium. More than 301,700 students in 436 schools received stormwater pollution prevention curriculum through these school outreach programs.

- The joint calendar project, coordinated across multiple watersheds, allowed participating permittees to distribute to residents a full color, one-page, poster-type calendar delivering the stormwater pollution prevention message through compelling photographic images.
- The Ballona WMC developed and distributed a joint mailer to promote stormwater pollution prevention throughout the watershed. A bifold pamphlet was developed providing a "To Do" list of activities that could cause pollution and suggested things that individuals can do to reduce or eliminate the adverse impacts of these activities. 133,550 copies of the brochure were printed and distributed by the participating agencies via direct mailing or as inserts into newsletters.
- The City of Los Angeles' Stormwater Program website had over 95,000 more hits in 2004-05 than the previous year. This 38% increase, along with responses to public surveys, indicate that the messages on preventing stormwater pollution, improving urban runoff water quality, and protecting our water resources are reaching an expanded audience.
- The City of Los Angeles' Stormwater Public Education Program, in partnership with the California Coastal Commission and Malibu Foundation, co-sponsored the 12th annual Ocean Day, Beach Clean at Dockweiler Beach on May 20, 2005.
- The City of Manhattan Beach has continued to promote awareness of stormwater pollution prevention through its "Ocean Safe City" message, which targets residents and businesses within the City. It is estimated that over half of the City's residents (20,000) participated in the Hometown Fair, Household Hazardous Waste Awareness Week, and Earth Day events. The City operated a booth at each event and gave out stormwater educational material to both adults and children.
- The City of Rancho Palos Verdes promoted stormwater pollution prevention at several City sponsored events throughout the year, as well as using the City newsletter and other media outlets to inform and educate its residents about the importance of stormwater pollution prevention. The City participated with other Ballona Creek WMA Cities to develop and produce a cooperative mailer, and then distributed it to all single-family households within the City.
- The City of Rolling Hills Estates and the City of Rolling Hills jointly staff a public education booth at the two-day annual Peninsula Street Fair. Teen volunteers conduct a hands-on demonstration using the County's Enviroscape model with particular emphasis on targeted pollutants (pet waste, horse manure, fertilizer and pesticides). After each demonstration the teens distribute public education brochures such as the equestrian and landscaping BMP brochures and related promotional items donated by the County. The City of Rolling Hills Estates also conducts the same outreach at its annual City Celebration.
- The Cities of Rolling Hills Estates and Rolling Hills distributed copies of USEPA Weather Channel's video *After the Storm* and Algalita Marine Research

Foundation's video *Plastics in the Open Ocean* to middle and high school environmental science teachers in public and private schools. All six periods of AP Environmental Science students at Palos Verdes Peninsula High School were shown these videos.

- The City of Alhambra staffed a public education booth at its annual Chinese New Year Celebration, Water Awareness Week, Seniors Health Fair, and Earth Day events where pollution prevention posters are displayed and public education brochures and related promotional materials were distributed (emphasis on trash, pet waste, home owner maintenance such as landscaping and painting, and fertilizer and pesticide use). During some outreach events the City's Envirocape Model was demonstrated with the assistance of children as the rainmakers.
- The City of Hermosa Beach invited restaurants owner/operators to a stormwater educational seminar to discuss the 2001 Municipal NPDES Permit and its implications pertaining to their day-to-day operations. The establishments were then inspected and rated. Those, which received the higher rates, were recognized by the Hermosa Beach City Council as the "Clean Ocean Establishment" and honored by receiving a certification and a sticker to display at their facility.
- The City of Hermosa Beach participated with other members of the Santa Monica Bay-Ballona Creek Watershed Management Committee to produce and mail 10,000 direct mail pieces to all Hermosa Beach residents. Another project through this joint effort was the development of the 2004 and 2005 calendars, which were produced and distributed to the public as a complimentary item.
- The City of Hermosa Beach has provided various PSAs to the local Cable Company in order to be aired as frequently as possible. These PSAs were obtained from different sources such as the Los Angeles County Department of Public Works and Earth 911. Where possible the PSAs were modified and tailored for the City's need. Examples were the "CAN-IT" and "Don't feed the Storm Drain" PSAs.
- The City of Signal Hill promoted local and countywide stormwater pollution prevention programs and events on the City's cable television channel and website and in the Press Telegram and Signal Tribune newspapers. The City of Signal Hill's cable channel also reaches City of Long Beach residents and businesses.
- City of Signal Hill published in the Press Telegram a public education piece entitled "Think Environment" to raise public awareness of the importance of preventing stormwater pollution and promote the City's and County's stormwater pollution prevention programs. This piece reached 109,000 newspaper subscribers in the Signal Hill/Long Beach area.
- City of Signal Hill developed pamphlets that are handed out to contractors and homeowners when issuing building/construction permits. These pamphlets explain

the BMPs that should be implemented and is specific to the activities of the construction project such as painting or masonry/concrete work.

- West Hollywood received a Partners in Education grant from the Santa Monica Bay Restoration Commission to provide Russian/English pollution prevention posters/flyers, waterbrooms, and follow-up visits to area restaurants.
- In 2002, the City of Santa Clarita became aware that there was diazinon contamination in a local creek. With cooperation and assistance from Los Angeles County, the City launched a very aggressive campaign to abate the contamination. An intensive investigation effort, a focused public outreach campaign and cooperation from local retailers and residents all lead to a 96% reduction of the initial diazinon levels. These efforts were implemented in compliance with the Regional Board's requirements and highlight the power of public outreach.
- The City of Santa Clarita continued its annual "River Rally," a river clean up and stewardship event. River Rally helps restore the Santa Clara River through picking up trash and debris and also helps educate local residents about the importance of protecting the environment. Over the past eleven years, River Rally has grown from 100 participants to over 1,400 last year. Participants range from the elderly to young children, with many youth organizations also lending their support. Everyone's enthusiastic efforts have made the event a great success the City is proud to sponsor. In fact, the City was honored by the Los Angeles Regional Board with the Water Quality Stewardship Award in 2004. Over the event's lifetime, volunteers have removed over 196,000 pounds of trash and debris that otherwise would have made its way downstream, affecting neighboring communities and the health of the river. River Rally's continuing popularity has helped City staff promote stormwater pollution prevention, litter prevention, air quality, household hazardous waste disposal, tree planting and other environmental issues.
- The four Cities on the Palos Verdes Peninsula—Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills and Rolling Hills Estates—have partnered to run a ¼ page, full-color ad four times per year in the Palos Verdes Peninsula News on days of promotional circulation when distribution reaches every household on the Palos Verdes Peninsula. The advertisement design uses an award-winning ad concept and photograph that is tailored to target our watershed pollutants and behaviors of concern.
- Three Cities on the Palos Verdes Peninsula, Palos Verdes Estates, Rancho Palos Verdes, and Rolling Hills Estates, jointly hosted a restaurant BMP training workshop conducted by the County of Los Angeles. In addition to invitations mailed by the County, this event was promoted through the City of Rolling Hills Estates' work with the Peninsula Chamber of Commerce and shopping center property management companies, one of which provided the meeting space for the workshop.

- The City of Culver City actively participated in environmental events such as Children's Earth Day (Eco-station), Ballona Creek clean-up, Fiesta La Ballona, and Ballona Creek Marsh Fair.
- The City of Pasadena in coordination with the County of Los Angeles organized a Gardening Workshop. The workshop included stormwater related issues and handouts to assist the public in reducing pollutants to the MS4.
- The City of Redondo Beach participated in the Heal The Bay Coastal Clean up day by purchasing T-shirts and donating them to the volunteers of this program. The City also conducted educational activities at various organized events such as the event held at the Seaside lagoon by the Wyland foundation and the event at the SeaLab, which was widely attended by children. The City's Quarterly Newsletter publishes a regular stormwater related advertisement that provides the community with a phone number if they have questions. Also, the Adelphia Cable Company broadcasts various storm water related PSAs in the City.
- The Mayor and City Council of Redondo Beach formed a Water Quality Task Force in August 2005 made up of a diverse cross section of the community including teachers, students, boaters, non-profit organizations, various member of the general public, the local chamber of commerce, and harbor businesses. Within twelve months the Task Force is to provide the City Council with recommendations that will address water quality in the harbor and other waterfront areas of the City.
- The City of Torrance has promoted local and countywide storm water pollution prevention programs during California Coastal Clean-up Day at Torrance Beach and at the City Yard Open House and the Health and Rideshare Fairs.
- The City of Torrance in conjunction with Metropolitan Water District of Southern California sponsors Protector Del Agua water efficient landscape classes on an annual basis that teach residents how to design and maintain landscapes that use less water and therefore generate less urban run off. In addition the two agencies developed a Water Wise native plant garden and demonstration water efficient landscape garden at the Madrona Marsh Nature Center and provide corresponding brochures that demonstrate how these gardens look and how they can reduce irrigation water and run off.
- The Principal Permittee partnered with the Cities of Malibu Creek Watershed in the creation of the "Living Lightly in Our Watershed Guide" which was distributed to every household watershed-wide. This Guide has continued to be updated and distributed at Public Libraries, City Halls and through the Las Virgenes Municipal Water District's new home buyer program.
- Newsletters containing a stormwater pollution prevention article and another on recycling and proper disposal of household hazardous waste were mailed to all 50,000 Burbank addresses including business.

- Stormwater education discussions and materials are passed out at all tours of the City of Burbank Recycling Center. This includes groups and visitors from near by elementary schools and community organizations. A mock demonstration of the watershed highlights all the water collection features in the City and stresses the importance of catch basins for stormwater runoff.
- The City of Vernon conducted a stormwater pollution prevention and compliance workshop geared for commercial and industrial businesses. Since there are over 160 facilities operating under the General Industrial Activities Stormwater Permit (GIASP) and over 800 facilities requiring an industrial/commercial inspection with the City of Vernon, the workshop has been instrumental in obtaining voluntary compliance for the Municipal Stormwater Permit and the GIASP. The City of Vernon also distributed bulk faxes to all businesses notifying them of important stormwater event information.
- The City of Los Angeles' Stormwater Public Education Program has received awards for many of its accomplishments, including:
 - 2005 American Public Works Association's (APWA) Diversity Exemplary Practices (Program/Organization Category) Award winner for its School Assembly/Ocean Day Program. (FY 04-05)
 - 2002 APWA Project of the Year Award for its outreach to home improvement centers and pet stores, and for the cost savings realized by the City through public-private partnerships. (FY 02-03)
- The City of Los Angeles' Used Oil Recycling Public Education Program has received awards for many of its accomplishments, including:
 - 2004 *Togetherness Award* from the California Integrated Waste Management Board (CIWMB) in recognition of a public/private partnership that exemplifies outstanding coordination and cooperation in the implementation of a used oil collection program. The El Sereno public outreach program saw a 42% increase in the amount of oil collected at local collection centers. (FY 03-04)
 - 2003 CAL EPA Program Innovation Award for the "Your Street" public education campaign. (FY 02-03)
- The City of Los Angeles, in partnership with the California Coastal Commission and Malibu Foundation, also co-sponsored several annual Ocean Day, Beach Clean Up events at Dockweiler Beach (FYs 03-04 and 04-05).
- In April 2005, the City of Los Angeles launched the "Los Angeles River – The Future is Now" public outreach campaign. (FY 04-05).
- The City of Hidden Hills provided and staffed a public outreach booth during the City's Annual Fiesta Day events held on October 1st and 2nd in 2005. The outreach booth provided residents with training and outreach materials and allowed

the City to educate many of its residents on storm water pollution prevention and best management practices used to minimize the amount of pollutants entering the City's storm drains.

- The City of South Gate has completed installing inserts in all city-owned catch basins and has contracted for regular inspections and cleaning.
- Pasadena has passed an ordinance to lower the threshold of the SUSMP application for the redevelopment projects from 5,000 square feet to 1,000 square feet and the same ordinance includes provisions to include all hillside projects regardless of their size for the SUSMP application and the numerical limits.
- The City of Inglewood partnered with the County of Los Angeles during the CanIt campaign resulting in a successful clean up day event. Staff regularly attends public events, such as Earth Day Celebrations or West Basin Municipal Water District's Water Harvest Festival, to distribute stormwater information brochures, present stormwater pollution demonstrations, and provide commemorative giveaways. The City contacted and worked with Heal the Bay to identify a Beach Clean Up location in the Dominguez watershed. Prior to this activity, only locations along the beach near the Dominguez Channel were clean up spots. Heal the Bay supplied the City with stormwater pollution workbooks for kids which staff distributed to the City's Recreation Department and the School District. The City is contracted with Adopt-A-Waterway. The City also arranges for stormwater messages, such as the USEPA video *After the Storm*, to air on the City's cable channel.

Industrial/Commercial Facilities Control

- The City of Signal Hill implemented pollutant reduction and control measures that resulted in the installation of an onsite stormwater detention system as part of a 12-acre Shopping Center development.
- West Hollywood assesses regulated businesses using an annual fee for NPDES inspections and is adding another fee for annual inspections of post -construction BMPs.
- The City of Torrance and Metropolitan Water District of Southern California sponsor the Commercial and Industrial Institutional Conservation Program that provides a rebate of \$150 per Water Mister Boom which are used to clean hard surfaces and use only 20% of the water previously used for wash down of hard surfaces and most of the water used evaporates or can be pushed toward landscaped areas thereby virtually eliminating run off from surface cleaning.
- The City of Vernon has effectively integrated stormwater inspections with the inspections required under the Health and Environmental Control Department's jurisdiction such as the Hazardous Materials Inspection Program, the Garment Inspection Program, the Food Processing Inspection Program, and the Solid Waste Inspection Program. The City of Vernon also conducted a stormwater pollution

prevention and compliance seminar that promoted voluntary compliance of these facilities.

- The City of Los Angeles Inspection & Enforcement Program is a member of the City Attorney's multi-agency environmental task force, which has launched several investigative initiatives against chronic health & safety and environmental violators for possible enforcement action and/or criminal prosecution. The combined authorities of the California Environmental Protection Agency, California Air Resources Board, Regional Board, California Department of Toxic Substances Control, Los Angeles County Health Hazmat Division, and many other agencies have targeted auto dismantlers, metal plating businesses, dry cleaners and other industries through its Sun Valley, MacArthur Park, Wilmington, and Chrome Plating Initiatives. The inspections are a proactive response to community concerns involving quality-of-life issues. (FYs 03-04 thru FY 05-06).

Development Planning

- The City of Rolling Hills Estates has adopted a landscaping ordinance that requires new landscapes to be designed to conserve water using a water budget approach. These requirements apply to new landscaping for commercial, office and institutional developments and to developer-installed landscaping in residential subdivisions.
- The City of Manhattan Beach requires commercial trash enclosures to be fully enclosed and to be constructed with drainage to the sanitary sewer system. The purpose of these construction requirements is to prevent stormwater contact with the trash enclosures and to prevent water that does come in contact with the enclosures from entering the storm drains. The City reviews building plans for the trash enclosure requirements and has been proactive in reaching out to businesses to increase awareness of the requirements.
- The City of Rolling Hills' Zoning Ordinance contains strict development standards for development ratios on each property—the City is entirely residential with minimum lot sizes of one acre. Only 35% of the net lot area may be developed with impervious surfaces, including all structures, patios and other paved areas. Given that the minimum lot size in the City is one acre, this provision promotes infiltration of stormwater into the ground and not onto streets. The City's water efficient landscaping ordinance requires use of a water budget and utilization of native and/or drought resistant vegetation while preserving established native flora and natural features of the lots.
- The City of Rolling Hills encourages residents to install pervious surfaces when landscaping or installing/reconstructing driveways. Many residents have replaced their driveways with grass-crete and other porous material. Access to stables is encouraged to be gravel and not paved. The City's Zoning Ordinance precludes large impervious surfaces, i.e. driveways may not cover more than 20% of the area of the yard in which they are located; uncovered motor courts/parking pads may not

cover more than 10% of the yard in which they are located. Tennis courts and sports courts are encouraged to have pervious surfaces. Additionally, the County implements the hillside home requirement that roof runoff be diverted to vegetated areas for all new development within the City.

- The City of Signal Hill funded the construction of an infiltration basin as part of the development of the Las Brisas affordable housing project. The basin collects dry and wet weather runoff and then allows the runoff to percolate. The drainage basin collects runoff from the six acre project site, which consists of 80 units of low income housing and a City mini-park and neighborhood community center. The non-profit housing developer was unable to afford to construct the drainage basin and keep the housing affordable for very low income residents, and thus the Signal Hill Redevelopment Agency included the drainage basin cost in its financial assistance for the project.
- The City of Santa Clarita requires a "solid roof" for the trash enclosures on all development and redevelopment projects that have trash requirements.
- The City of Vernon has implemented specific post construction inspection, maintenance, and mitigation plan requirements for operators of all treatment control BMPs which are designed to retain water. Approval for the installation of a water retaining BMP is performance based and requires the implementation of a maintenance plan. The plan consists of weekly BMP inspections (during presence of water in BMP), accurate inspection and maintenance logs, and a plan of action in the event that a vector problem is discovered. These requirements are a result of vector control concerns where treatment control BMPs product manufacturers fail to provide an adequate vector exclusion device or attachment for their water retaining product. Compliance determination is achieved through the Vernon Industrial/Commercial Inspection Program.

Development Construction

- The City of Rolling Hills implements strict grading practices. Only 40% of the net lot area of a lot may be disturbed during construction. The City does not allow import or export of soil from construction projects so that all grading must be balanced on site.
- The City of Torrance developed local pamphlets that are handed out to contractors and homeowners when issuing building/construction permits. These explain the BMPs that should be implemented and is specific to activities of the construction project.

Public Agency Activities

- Runoff from wash racks at the Rolling Hills Estates municipal stables is diverted to the sanitary sewer via an approved pretreatment permit. Pretreatment of this runoff consists of screening to remove horsehair and gross solids.

- The City of Rolling Hills Estates has a proactive litter abatement program for keeping public rights-of-way, streets, medians, parks, and trails free of litter and debris. It also has a successful Adopt-a-Trails Cleanup and Maintenance program. The City has accelerated street sweeping with all public streets swept twice per month. The City has placed recycling bins for beverage containers in a number of City parks and commercial areas.
- The City of Hermosa Beach operates an aggressive Public Agency Program, which includes street sweeping and catch basin cleaning activities. In addition, the City has outfitted 60% of its own and 100% of the County owned (downtown area) catch basins with inserts to help reduce the amount of debris entering the storm drain system. An annual contract with a private contractor is funded to ensure proper cleaning and maintenance of the installed devices.
- The City of Signal Hill established an E-Waste Collection Program to collect and recycle electronic waste that was dumped in the public right-of-way. The City also established a Curbside collection program for used motor oil. Do-it-yourselfers are provided a free used motor oil/filter container that can be left at the curbside and collected by the City for recycling. Approximately 150 gallons of used motor oil is recycled annually through this program.
- The City of Signal Hill established the Willow Street/Cherry Avenue Corridor Clean Up Program. This program collects trash and debris along the City's two busiest commercial corridors on a weekly basis.
- The City of Signal Hill has expanded its Bus Shelter Cleaning Program from one cleaning per week to three cleanings per week.
- The City of Signal Hill installed pet waste collection stations at City Parks and along its trail systems. The pet waste collection stations have proven to be successful as they are highly used.
- The City of Signal Hill serves as the lead agency in a partnership with the City of Long Beach and the County of Los Angeles on the Hamilton Bowl Trash Reduction Project. This project will construct and evaluate the effectiveness of various trash removal devices in removing trash from stormwater runoff.
- West Hollywood has installed debris excluders with grant funds from the California Coastal Conservancy, Los Angeles County, and the City's general fund.
- West Hollywood's porous pavement parking lot at Spaulding Avenue was awarded the American Public Works Association's Project of the Year Award and the Outstanding Government Project Award from the American Society of Civil Engineers.
- West Hollywood provides daily hand pick up of litter and street sweeping services on major arterials.

- In an effort to prevent illegal disposal of household hazardous waste (HHW) and to provide residents a safe and responsible means of HHW disposal, the City of Santa Clarita has implemented a very successful door-to-door HHW collection program. During the term of the 2001-2006 NPDES Permit, Santa Clarita has collected over 356,857 pounds of hazardous waste with over 3,880 households participating.
- The Santa Clara River Steering Committee was recognized for its work in the restoration of the local watershed and was honored with the 2003 Water Quality Award for Water Body Restoration.
- The Rolling Hills City Hall area is landscaped with native and drought resistant plants and maintained with minimal irrigation and application of fertilizers and pesticides.
- The City of Carson constructed approximately 4,000 feet of landscaped median islands. As an erosion control measure, the City also constructed rolled AC curbs on all properties adjacent to the street where erosion has been a problem.
- The City of Culver City was awarded a grant totaling \$1.252 million for structural stormwater BMPs. The grant project, which consists of the following multi-functional BMPs, will be completed by June 2008:
 - 2 bioretention cells or rain gardens in City parks that will provide infiltration, pollution remediation for multiple pollutants, and aesthetic recreational medium for the public.
 - 672 innovative, 2-tiered catch basin inserts that will provide full-capture for gross pollutants, including trash.
 - 500 low-flow, high-pressurized water broom for critical or potentially high polluting businesses to reduce/eliminate nuisance flows and prevent dry weather pollution from commercial areas. Bilingual door-to-door education will be provided to business employees to ensure sustained and consistent use of water brooms.
 - 50 tamper-free recycling bins and trash receptacles in high trash-generating areas, such as schools and convenience stores.
- The City of Pasadena temporarily blocks catch basins during events, such as the Rose Parade, where there is an elevated risk of excessive trash entering the storm drain system.
- The City of Santa Clarita, through its negotiations with its residential solid waste hauler, successfully negotiated the free collection of E-Waste through its bulky item collections program. Now residents can have up to four free bulky item collections per year of up to three items per collection.

- The City of Burbank continues to perform street sweeping of all City streets once a week. This level of street cleaning helps to remove potential contaminants from reaching the catch basins.
- All City of Burbank employees involved with stormwater management and pollution prevention are provided with a wallet size card containing contact information to address stormwater concerns from the public as well as a list of allowable discharges.
- City of Los Angeles voters overwhelmingly supported Proposition O, the Clean Water, Ocean, River, Beach, Bay Storm Water Cleanup Measure – General Obligation Bonds, on November 2, 2004. Proposition O passed with nearly 76% of City residents voting “yes” on the proposition.
- Data from the City of Los Angeles Status and Trends Monitoring Program, which was established to characterize indicator bacteria levels and heavy metal pollutants in the Los Angeles River, Ballona Creek, and Dominguez Channel watersheds, has been used for a variety of purposes, including TMDL development by regulatory agencies, determining baseline pollutant levels referenced in Sanitary Sewer Overflow sampling protocol, and for prioritizing watershed management strategies.
- The City of Los Angeles installed four floating wetland islands in Echo Park Lake to reduce nutrient loads and other pollutants associated with urban run-off. Two additional wetland islands were installed in MacArthur Park Lake and Debs Park Pond, respectively. (FYs 04-05 and 05-06).

Illicit Connections/Illicit Discharges Elimination

- The City of Rolling Hills Estates revised its solid waste ordinance to enhance its code enforcement authority over improper disposal of manure among the equestrian community. The ordinance requires that manure be kept in an enclosed storage container and removed at least once per week, or that manure used for composting be kept in an enclosed composting container. The City facilitates this requirement by offering enclosed manure storage containers and curbside manure removal service with offsite composting through its residential solid waste franchise agreement.
- Manure collection and off-site composting services for owners of horses is available through the City of Rolling Hills’ franchise waste hauler.
- The City of Pasadena has established a separate Hotline for reporting illicit discharges. The number is 626-744-STRM.
- The City of Vernon has effectively integrated illicit discharge and illicit connection detection and elimination procedures with the inspections required under the Health and Environmental Control Department’s jurisdiction (i.e. Hazardous Materials Inspection Program, the Garment Inspection Program, the Food Processing Inspection Program, and the Solid Waste Inspection Program). All facilities

inspected, regardless if the facility is covered under the Vernon Commercial/Industrial Inspection Program, are evaluated to ensure there are no illicit discharges from the facility.

Best Management Practice and Capital Improvement Projects

- Wetlands were constructed by the City of Los Angeles in AF Hawkins Park in South Los Angeles that will treat onsite stormwater runoff and will serve as a water feature that enhances the park's aesthetic values. (FY 04-05).
- The City of Los Angeles and the Los Angeles County Flood Control District are developing the Tuxford Green project as a joint project that will decrease flooding and improve stormwater quality at the intersection of Tuxford Street and San Fernando Road. Underground cisterns will be built to remove trash, debris, oil and grease, and suspended pollutants. A demonstration landscaping feature will also be constructed above the cisterns, to be irrigated in part by the retained water. (FY 0405)/
- Construction began in July 2004 on improvements, including non-traditional stormwater management techniques, at the City's Sun Valley Park and Recreation Center. The City of Los Angeles, the Los Angeles County Flood Control District, area residents, businesses, and environmental groups developed this pilot project that will alleviate local flooding, enhance recreational opportunities, and demonstrate the effectiveness of non-traditional stormwater management techniques. (FY 03-04).
- As part of the City of Los Angeles' Low Flow Diversion (LFD) Program, seven LFDs were constructed to prevent/eliminate beach closures in Santa Monica Bay during the summer months. The City received the 2004 National Environmental Achievement Award for Public Service from the American Municipal Sewerage Agencies (AMSA) upon completion of this project.

Los Angeles River Programs

- Established in March 2005, the City of Los Angeles has led the Los Angeles River Plastics Initiative Industry Task Force to develop recommendations on reducing plastic bag litter in the river. Task force members include a cross-section of representatives from industries that manufacture or distribute plastic bags and polystyrene products, retailers, waste and recycling interests, environmental and Los Angeles River watershed advocacy groups, and City staff. (FY 04-05).
- In May 2004, the City of Los Angeles hosted a day-long conference at the USC Davidson Center for the scientific community regarding the science and biology of the Los Angeles River. The conference included presentations on the current water quality and habitat monitoring efforts taking place along the Los Angeles River, and concluded with a six-member panel discussing the critical issues facing the Los Angeles River. (FY 03-04).

Interagency Coordination and Planning

- The City of Los Angeles has embarked on developing an Integrated Resources Plan (IRP) that addresses the facility needs of the City's wastewater, recycled water, and urban runoff/stormwater management programs through the year 2020. The County and municipalities neighboring the City are active participants in the IRP process. It is anticipated that this effort will benefit individual stormwater programs and overall interagency coordination. (FY 03-04).
- The City of Los Angeles is working with the Los Angeles Unified School District (LAUSD) and Tree People to incorporate stormwater BMPs in the design guidelines for schools. This cooperative effort is part of LAUSD's school construction and renovation program. The City's three goals are for the schools to: 1) retain all stormwater on-site; 2) reuse or recharge all stormwater on-site; and 3) incorporate off-site water, whenever feasible. (FY 04-05).



California Regional Water Quality Control Board

Los Angeles Region

RB-AR165



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

July 12, 2006

Mr. Kenneth Farfsing, City Manager
City of Signal Hill
2175 Cherry Avenue
Signal Hill, CA 90755

THE REISSUANCE OF THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM WATER DISCHARGE PERMIT FOR THE COUNTY OF LOS ANGELES AND PERMITTEES (NPDES No. CAS004001, ORDER No. 01-182) - REVIEW OF THE CITY OF SIGNAL HILL REPORT OF WASTE DISCHARGE

Dear Mr. Farfsing:

We have received the Report of Waste Discharge (ROWD) submitted on June 12, 2006 for a Signal Hill Municipal Separate Storm Sewer System Permit (SHMS4 Permit). Municipal storm water discharges from the City of Signal Hill are presently regulated under Regional Board Order No. 01-182, which expires on December 12, 2006.

The City of Signal Hill (City) by submitting a separate ROWD is pursuing a separate MS4 permit and will assume among other things, the responsibility for a city specific storm water management program and monitoring program.

Our review of the ROWD indicates that while the City is proposing some positive changes other areas of the ROWD do not satisfy federal storm water regulations contained in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (61 Fed Reg. 41697). Some of the inadequacies include:

1. The elimination of inspection programs for commercial facilities;
2. The elimination of the Development Planning Program including SUSMP and peak flow controls;
3. The elimination of Local SWPPPs for all construction sites 1 acre and greater;
4. The monitoring program description only includes a simplistic monitoring regime with a lack of details such as whether samples will be "grab" or "flow weighted composite" samples; and
5. The proposal for inclusion of TMDL requirements only in memoranda of understanding (MOUs) in lieu of TMDL Waste Load Allocations (WLAs) included in NPDES Permits as required by federal regulations.

Federal Regulations (40 C.F.R. § 122.44(d)(1)(vii)(B)) require that NPDES Permits incorporate all applicable TMDL WLAs when reissued and are made enforceable. There is no existing

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Kenneth Farfsing
City of Signal Hill

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July 12, 2006

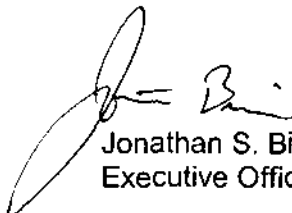
authority to use MOUs for compliance within the NPDES regulatory scheme. Further, any dry weather WLAs are unaffected by storm water policy.

The ROWD did not satisfy the requirements in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (*61 Fed Reg. 41697*). For these and other deficiencies in the ROWD, we deem it incomplete.

We do however, look forward to working out these details with your staff during the MS4 permit reapplication process. Our review will not be deemed to prejudice the Board from raising additional subject matter not identified herein, during the permit reissuance process. We intend to conduct a series of work-group meetings to receive input over the coming months with Permittee representatives and interested persons, to assist us in developing permit requirements. Pursuant to 40 CFR 122.6, Order 01-182 shall remain in effect and enforceable until a replacement LA MS4 Permit (with Signal Hill as a Permittee) or Signal Hill MS4 Permit is adopted by the Board.

If you have any questions, please do not hesitate to contact me at (213) 576-6605 or Dr. Xavier Swamikannu at (213) 620-2094 or Carlos Urrunaga at (213) 620-2083.

Sincerely,



Jonathan S. Bishop
Executive Officer

Enclosure

cc: Mr. Michael Levy Esq, Office of the Chief Counsel, State Water Resources Control Board
Mr. Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board
Mr. Eugene Bromley, CWA Standards and Permits, USEPA Region IX
Mr. Dan Lafferty, Watershed Mgmt. Division, Los Angeles County Dept. of Public Works

California Environmental Protection Agency

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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

**CITY OF SIGNAL HILL**

2175 Cherry Avenue • Signal Hill, California 90755-3799

September 12, 2006

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. Jonathan Bishop
Executive Officer
Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Report of Waste Discharge for Renewal of the Municipal NPDES Permit for the County of Los Angeles and Permittees (NPDES No. CAS 004001, Order No. 01-182)

Dear Mr. Bishop:

The purpose of this letter is to respond to your letter dated July 12, 2006, concerning the City's Renewal Application for its Municipal NPDES Stormwater Permit (i.e., Report of Waste Discharge (ROWD)). We appreciate your acknowledgement that the City is proposing positive changes with the ROWD, but do not agree with your contentions that the City's ROWD does not satisfy federal storm water regulations, or the US EPA's Interpretative Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems, or that the ROWD is otherwise inadequate. The following numbered items correlate with the numbered comments in your letter of July 12:

1. The Inspection Programs For Commercial Facilities Is Not Required

As set forth in the City's ROWD, the federal regulations only require Permittees to have an inspection program for stormwater discharges from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to Section 313 of Title III of the Superfund Amendments and Reauthorization of 1986, and industrial facilities that the municipality determines are contributing a substantial pollutant loading to the MS4. (40 C.F.R. 122.26(d)(2)(iv)(C).) There is nothing in the federal regulations that requires an inspection program for "commercial" facilities, and with respect to industrial facilities, there is clearly no obligation on the part of the municipalities to inspect state permitted industrial facilities that are already required to

Mr. Jonathan Bishop
September 12, 2006
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be inspected by the Regional Board, or for that matter, to have an inspection program for any other industrial operations other than those referenced above.

The ROWD is entirely consistent with the regulations as it provides for the inspection of the industrial facilities identified in the regulations, specifically including those which the municipality determines are contributing a "substantial pollutant loading to the municipal storm sewer system."

Finally, as you are aware, the ability of the Regional Board to force a commercial or industrial inspection program upon the City that is contrary to what the regulations allow for, is presently in litigation. Of course, regardless of how the litigation is resolved, there remains nothing in the regulations requiring that such an inspection program be included in the ROWD.

2. The Development Planning/SUSMP and Peak Flow Control Program Is Not Required

Again, as set forth in the City's ROWD, the SUSMP and Peak Flow provisions in the existing permit are being challenged in court, and, as proposed, are contrary to federal law, Water Code section 13360 and the procedures for evaluating and mitigating environmental impacts under the California Environmental Quality Act ("CEQA"). In addition, the specific SUSMP program in the existing permit, and particularly the Numeric Design Criteria set forth therein, are plainly not required by the federal regulations. To the contrary, the federal regulations only provide for a general management program "to reduce pollutants from runoff from commercial and residential areas that are discharged *from* the municipal storm sewer system. . . ." (40 C.F.R. 122.26(d)(2)(iv)(A).)

Thus, the regulations do not require the SUSMP or Peak Flow program imposed upon the City under the 2001 Permit. The City will, however, continue to address runoff from commercial and residential areas, and, in particular, the impacts from such stormwater discharges that are being discharged from the municipal storm sewer system, in accordance with the environmental review and mitigation process set forth under California Environmental Quality Act.

3. Local SWPPPs For All Construction Sites One Acre and Greater Are Inappropriate

The requirement in the existing NPDES Permit for developers to provide local Storm Water Pollution Prevention Plans ("SWPPPs") for all construction sites one acre and greater, is not a requirement set forth anywhere under the federal regulations, and in fact is duplicative of the requirement imposed on the State and Regional Boards under the General Construction Activities Stormwater Permit issued by the State Board. Nothing in the federal regulations requires municipalities to impose SWPPPs on all or

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any construction site, one acre or otherwise. The SWPPP requirement was thus appropriately left out of the ROWD submitted by the City.

4. The Monitoring Program Is Adequate and Consistent With Federal Regulations

The federal regulations also do not require that any specific monitoring program be included in a municipal NPDES Permit. Moreover, with respect to monitoring, in EPA's Interpretative Policy Memorandum, EPA stated that: "EPA encourages permitting authorities to work with permittees to determine if storm water monitoring efforts are appropriate and useful. . . . Reapplication is an appropriate time for MS4s to evaluate their monitoring program and propose changes to make the program more appropriate and useful. To accomplish this, municipalities may wish to consider using monitoring techniques other than end-of-the pipe chemical-specific monitoring, including habitat assessments, bioassessments and/or other biological methods." (61 Fed.Reg. 41698.)

Accordingly, in this case, given the change in the administration of the monitoring program from the County to the City, in light of the City's filing of a separate ROWD, the City has modified its monitoring program in a manner consistent with the regulations. The City thus specifically requests that the Regional Board "work with" the City in arriving at an appropriate monitoring program for the City's ROWD, as called for in the federal regulations and consistent with EPA's Interpretative Policy Memorandum, and that the Regional Board give due consideration to the monitoring program proposed in the City's ROWD.

5. Compliance With TMDL Requirements Through An MOU In Lieu Of Requiring Strict Compliance With Wasteload Allocations In the Permit Is Consistent With the Federal Regulations and Policy

The federal regulation cited in your letter, i.e., 40 C.F.R. § 122.44(d)(1)(vii)(B), does not require the incorporation of wasteload allocations as effluent limits in a municipal NPDES permit. To the contrary, this regulation only provides that when "effluent limits" are developed to be protective of narrative water quality objective, they must be "consistent with the assumptions and requirements of any available waste load allocations for the discharge prepared by the state and approved by EPA pursuant to 40 C.F.R. 130.7." (40 C.F.R. § 122.44(d)(1)(vii)(B).

There is no authority and no requirement under State or federal law, that compels the incorporation of a TMDL's waste load allocation into a municipal NPDES Permit, either as a strict numeric effluent limit, or otherwise. To the contrary, as specifically set forth in a November 22, 2002 EPA Policy Memorandum entitled "EPA Guidance Memorandum for Developing TMDLS in California," EPA determined the exact opposite was appropriate, finding that: "because stormwater discharges are due to storm events that

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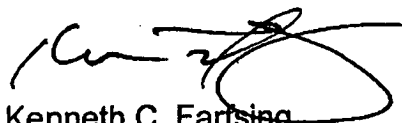
are highly variable in frequency and duration and are not easily characterized, only in rare cases will it be feasible or appropriate to establish numeric limits for municipal and small construction storm water discharges." In fact, EPA went on to find that in the TMDL context, not only are numeric effluent limits not required to be imposed on municipal storm water dischargers, that under such circumstances, "BMPs are an appropriate form of effluent limits to control pollutants in storm water." (See EPA's November 22, 2002 Guidance Memorandum, p. 5, citing 40 C.F.R. § 122.44(k)(2) & (3).

In addition, under federal law, "the permitting agency has discretion to decide what practices, techniques, methods, and other provisions are appropriate and necessary to control the discharge of pollutants." (*City of Rancho Cucamonga v. Regional Water Quality Control Board – Santa Ana Region* (2006) 135 Cal.App. 4th 1377, 1389.) This discretion to determine appropriate and necessary practices, techniques and methods, is also confirmed by EPA's Interpretive Policy Memorandum. (61 Fed. Reg. 41698) There is thus nothing in federal law requiring the incorporation of a TMDL's waste load allocations into a municipal NPDES.

In light of the above and given the extensive information provided in the City's ROWD, the ROWD plainly satisfies the requirements of EPA's Interpretive Policy Memorandum, as well as all other resubmission requirements provided for under the regulations. We look forward to working with you to address these issues and towards the reissuance of the subject municipal NPDES Permit for the City, with the existing Los Angeles County MS4 NPDES Permit remaining in effect until such new permit is issued.

Thank you for your attention to the above and please do not hesitate to contact the undersigned should you have any questions or need any additional information.

Sincerely,



Kenneth C. Farsing
City Manager
City of Signal Hill

cc: Mr. Bruce Fujimoto
Mr. Eugene Bromley
Mr. Dan Laufferty
Richard Montevideo, Esq.

Report of Waste Discharge

**National Pollutant Discharge Elimination System
Municipal Separate Storm Sewer System**

**Renewal Application for the Cities of
Azusa, Claremont, Glendora, Irwindale, and Whittier**

**As Current Permittees Under
National Pollutant Discharge Elimination System
Municipal Stormwater Permit
Order No. 01-182
NPDES Permit No. CAS004001**

June 12, 2006

Report of Waste Discharge

**National Pollutant Discharge Elimination System
Municipal Separate Storm Sewer System**

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June 12, 2006

Upper San Gabriel River Watershed Coalition
Report of Waste Discharge – June 12, 2006

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Section 1 Introduction

1.1 Purpose

In accordance with the requirements found in Part 6, Section S of the existing 2001 Los Angeles County National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit (NPDES No. CAS004001), **Order No. 01-182**, this Report of Waste Discharge (ROWD) constitutes renewal of Waste Discharge Requirements (WDRs) adopted in Order No. 01-182 by the Regional Water Quality Control Board, Los Angeles Region (Regional Board) on December 13, 2001.

This ROWD is thus being submitted as both a Report of Discharge under Order No. 01-182 (an NPDES Permit that included as Permittees under the County of Los Angeles, the Los Angeles County Flood Control District [the Principal Permittee] and all incorporated Cities within the County, except the City of Long Beach), as well as a separate application for the Cities listed herein under Table 1 -- which shall be collectively referred to as the **Upper San Gabriel River Watershed Coalition** -- for the renewal of this 2001 NPDES Permit.

This ROWD includes a report on the activities and results of the programs implemented under Order No. 01-182 for all Permittees thereunder, along with proposed programs and permit terms for the City's renewed NPDES Stormwater Permit.

It is important to note that following the issuance of Order No. 01-182, numerous Permittees under the 2001 Permit filed legal challenges to many of the terms and provisions of Order No. 01-182, as well as to the procedure and review and approval process followed by the Regional Board when adopting the 2001 Permit. These legal challenges remain pending before the Court of Appeal of the State of California, Second Appellate District, Appellate Court Case No. B184034.¹

¹The following Permittees are appellants and continue to challenge many of the provisions in Order No. 01-182: The Cities of Arcadia, Artesia, Bellflower, Beverly Hills, Carson, Cerritos, Claremont, Commerce, Covina, Diamond Bar, Downey, Gardena, Hawaiian Gardens, Industry, Irwindale, La Mirada, Lawndale, Monrovia, Norwalk, Paramount, Pico Rivera, Rancho Palos Verdes, Rosemead, Santa Clarita, Santa Fe Springs, Signal Hill, South Pasadena, Torrance,

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Further, in light of the significance of implementing a new set of WDRs and a new MS4 NPDES Permit on the environment, the Applicants herein¹ request that before any new Permit is issued based on this ROWD, that the State and Regional Board's first take all action as required to comply with the California Environmental Quality Act ("CEQA"), recognizing that any exemption provided under California Water Code section 13389 is a limited exemption from Chapter 3 of CEQA only. Moreover, there is no exemption from CEQA where the State and Regional Boards impose permit requirements which go beyond the federal law requirements set forth under the Clean Water Act. Accordingly, compliance with the requirements of CEQA, before a new municipal permit for the Applicants is issued, is essential so that all potentially significant adverse impacts to the environment from this project, are fully evaluated and properly mitigated, and so that all feasible alternatives to particular permit terms that may result in potentially significant adverse impacts, have been evaluated.

In addition, the Permittees remain concerned with the imposition of unfunded mandates under Order No. 01-182, and thus request that any mandated programs under the new permit only be imposed on the Applicants where the requirements of the California Constitution prohibiting the imposition of unfunded mandates upon the Applicants have been complied with.

Also, because the Regional Board is not a State agency with State-wide jurisdiction, the Regional Board is not an agency that by itself has the authority to issue an NPDES permit under the Clean Water Act. Accordingly, the Permittees named herein (which shall also be referred to as "Applicants"²) request that any new NPDES permit to be issued to the Applicants, be issued only after it has been reviewed and ultimately approved by the State Water Resources Control Board ("State Board"). The Applicants shall be submitting this ROWD with the understanding that it is not waiving any rights, objections or challenges it has brought or may bring in connection with the issuance of Order No. 01-182, or any other related

Vernon, Walnut, West Covina, Westlake Village, Whittier, and the County of Los Angeles and the Los Angeles County Flood Control District.

²Azusa, Claremont, Glendora, Irwindale, and Whittier

Report of the Watershed Coalition
Report of Stormwater Discharge

objections and challenges that may have been brought by the Applicants to other water quality orders, directives or regulations, and with the understanding that the Applicants are not waiving or relinquishing any rights it has or may have in connection with any new permit to be issued to replace Order No. 01-182.

1.2 Regulatory Background

The 1972 Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) Permit program to regulate the discharge of pollutants from point sources to waters of the United States. However, pollution from land and urban runoff was largely unabated for over a decade. In response to the 1987 Amendments to the Federal Clean Water Act (CWA), the United States Environmental Protection Agency (EPA) developed Phase I of the NPDES Stormwater Program in 1990, which established a framework for regulating urban stormwater runoff. The Phase I program addressed sources of stormwater runoff that had the greatest potential to negatively impact water quality. Under Phase I, EPA required NPDES Permit coverage for stormwater discharges from:

- medium and large municipal separate storm sewer systems (MS4) with populations of 100,000 or more
- facilities that fall within eleven categories of industrial activity, including construction activity that disturbs five or more acres of land

Operators of MS4s regulated under the Phase I NPDES Stormwater Program were required to obtain Permit coverage for stormwater discharges under their control. The most significant portion of application was the development of a proposed stormwater management program that would meet the standard of "reducing the discharge of pollutants from the MS4 to the maximum extent practicable (MEP)." Stormwater management programs for medium and large MS4s include measures to:

- Identify major outfalls and pollutant loadings

Regional Board of the United States Environmental Protection Agency
Report of Public Discharge

- Detect and eliminate non-stormwater discharges to the system
- Reduce pollutants in runoff from industrial, commercial, and residential areas
- Reduce pollutants from construction sites within their jurisdiction

1.3 Objectives

The objective for the Applicants in submitting this ROWD is to successfully renew a Los Angeles County NPDES Municipal Stormwater Permit (also referred to herein as the Los Angeles County MS4 Permit), which includes requirements to achieve the goal of "reducing pollutants to the MEP" while taking into account:

- Feasibility
- Financial resources available
- Cost of implementation
- Overall benefit to water quality
- Effectiveness of existing Stormwater Quality Management Program (SQMP)
- Suggested improvements to existing SQMP
- Suggested approaches to improve receiving water quality
- Use of best available technologies; and
- Integration of impaired water body specific programs

1.4 Program Description

On December 13, 2001, the Regional Board adopted Order No. 01-182 serving as the NPDES Permit for municipal stormwater and urban runoff discharges within the County of Los Angeles. The

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requirements of Order No. 01-182 apply to 84 Cities and the unincorporated areas of Los Angeles County under County jurisdiction, with the exception of Avalon, Long Beach, and the portion of Los Angeles County in the Antelope Valley, which includes the Cities of Lancaster and Palmdale. Under the Permit, the Los Angeles County Flood Control District is designated the Principal Permittee, and the County of Los Angeles along with 84 incorporated Cities are designated Permittees. In Order No. 01-182, the Principal Permittee coordinates and facilitates activities necessary to comply with the requirements of the Permit, but is not responsible for ensuring compliance of any of the Permittees. It should also be noted that many parts of Order No. 01-182 have been challenged in a lawsuit filed in Los Angeles County Superior Court by a number of the Permittees thereunder. This legal challenge remains pending on appeal, in the Court of Appeal of the State of California, Second Appellate District, Case No. B184034.

Through the current Los Angeles County MS4 Permit, the Regional Board implemented a *Watershed Management Approach* to address water quality protection in the region. The *Watershed Management Approach* intended to provide a comprehensive and integrated strategy towards water resource protection, enhancement, and restoration while balancing economic and environmental impacts within a hydrologically defined drainage basin or watershed. The current Los Angeles County MS4 Permit divides Los Angeles County into the following six Watershed Management Areas (WMAs):

- Ballona Creek and Urban Santa Monica Bay WMA
- Dominguez Channel/Los Angeles Harbor WMA
- Los Angeles River WMA
- Malibu Creek and Rural Santa Monica Bay WMA
- San Gabriel River WMA
- Santa Clara River WMA

A list of Permittees is provided under the 2001 Permit and in the Los Angeles County Unified ROWD.

Under this ROWD, the Cities listed under Table 1, under Section 2 are Applicants and shall be referred to as such herein. Each of these cities share the common characteristic of discharging wholly or

partially into reaches 2 and 3 of the San Gabriel River Watershed (which shall also be referred to herein as the Upper San Gabriel River Watershed).³

1.5 A Watershed Management Approach

The Applicants have chosen to participate in a watershed group permit because the *Watershed Management Approach* under the current Los Angeles County MS4 Permit has not been successful in providing a “comprehensive and integrated strategy towards water resource protection, enhancement, and restoration.”

Watershed Management Committees (WMC) have not been able to address watershed-specific pollution management. While WMC meetings are convened regularly – month to month in the case of the San Gabriel WMC -- they are not organized to focus on watershed-specific pollutant issues. Instead, they tend to be preoccupied with “issues of the day,” ranging from generic compliance issues to agenda items discussed by the Executive Advisory Committee (EAC), which serves largely as a “communication forum” on NPDES matters and is attended by many Los Angeles County MS4 Permittees.

The inability of the San Gabriel River WMC to focus on watershed-specific pollutant issues may have to do with the following:

1. The County of Los Angeles, which is the Principal Permittee under the current Los Angeles County MS4 permit, is not organized or adequately staffed to address pollutants of concern on a watershed basis, despite the fact that it has created a watershed management division. This is probably the result of its understandable preoccupation with total maximum daily loads (TMDLs), including trash and bacteria; and that it is simply overburdened with having to manage 6 watersheds, consisting of 88 municipalities, including the City and County of Los Angeles, while also managing its own storm water management program.

³Reach 2 of the San Gabriel River lies between Ramona Boulevard and Firestone Boulevard, while Reach 3 lies between Ramona Boulevard and Morris Dam).

Upper San Gabriel River Watershed Coalition
Report of Waste Discharge

2. Watershed groups, since the MS4 NPDES permit for Los Angeles County was first issued in 1990, have been based on geographic location rather than on hydrological distinctions. There is, for example, significant differentiation between the upper and lower portions of the San Gabriel River and Los Angeles River. In fact, the Upper San Gabriel River and Upper Los Angeles River municipalities appear to have more in common hydrologically with one another -- because they are located above the Whittier Narrows and Rio Hondo spreading grounds -- than with municipalities in the lower portions of Los Angeles and San Gabriel Rivers. Therefore, it is difficult to focus on watershed pollutants of concern for the San Gabriel River because they are actually two watersheds or sub-watersheds, if you will.
3. As is the case with large organizations, it is difficult for the County of Los Angeles, which is designated as Principal Permittee under the current Los Angeles County MS4 Permit, to adjust quickly from its county-wide storm water management program to a truly watershed/sub-watershed based program.

As a result of these foregoing reasons, there has been no effort to develop a "comprehensive and integrated strategy towards water resource protection, enhancement, and restoration."

It would seem that the first step in this direction would be to identify pollutants of concern, using the Federal Clean Water Act section 303(d) list ("303d list") which ranks pollutants in terms of low, medium, and high priorities. The next step would be to identify the sources of each pollutant in terms of use and activities. Finally, each permittee's storm water quality management program (SQMP) would then be amended to focus best management practices (BMPs) to the following extent:

1. Develop a comprehensive public education outreach program that would focus on each pollutant of concern directed at general audiences, contractors/developers residences, certain industrial/commercial facilities, and at certain activities (e.g., equestrian facilities to address bacteria).

2. Require BMPs for construction projects to focus on pollutants of concern, including minimum BMPs for projects less than 1 acre and projects 1 acre or more and storm water pollution prevention plans (SWPPPs) associated with General Construction Activity Storm Water Permits (GCASWPs).
3. Require industrial facilities covered under a General Industrial Activity Storm Water Permit (GIASWP) that generate pollutants of concern implement to appropriate BMPs to mitigate them.
4. Require commercial facilities that generate pollutants of concern to implement BMPs (source and treatment controls).
5. Require post-construction BMPs to address activities that are expected to generate a pollutant of concern.
6. Apply for grants to procure source and treatment controls (e.g., USEPA water infrastructure, Integrated Regional Watershed Management Program, and consolidated grant program grants).
7. Partner with other agencies in the region charged with protecting water quality to address pollutants of concern.

1.6 Rationale for a Watershed-Based MS4 Permit

All of the Applicants are assigned under the Los Angeles County MS4 Permit to the San Gabriel River Watershed. Most of them, with the exception of the Cities of Whittier and Irwindale, drain exclusively into Whittier Narrows spreading grounds. Approximately 30% of the City of Whittier drains into spreading grounds, while the 70% of it drains into the lower San Gabriel River, below the spreading grounds. The City of Irwindale drains mostly into Upper San Gabriel River, but also drain in the Upper Los Angeles River as well – 28% and 20% respectively.

The rationale for applying for a separate, watershed-based permit is as follows:

17. The effect of water quality conditions
on the discharge

1. To allow smaller Cities to develop and implement more efficient stormwater programs that focus on sub-regional and city-specific pollution reduction measures, based on specific pollution issues (as opposed to generalized county-wide programs).
2. To investigate the use of the spreading grounds and other percolation basins in the watershed for use as infiltration controls to address post-construction BMP requirements and total maximum daily loads (TMDL).
3. By being separate from large municipalities, smaller Cities can work more effectively towards pin-pointing specific sources of pollution within their jurisdictions. They can also address them through behavior-specific public education outreach and structural and non-structural BMPs.
4. By aggregating into a group of small Cities, public funding of runoff pollution projects would be easier and more cooperative. This is especially true of TMDLs and other pollutants of concern identified on the Basin Plan 303(d) list. Under the current MS4 permit, permittees must compete with the Principal Permittee and the City of Los Angeles for funding, which generally has more clout than an individual or even a group of smaller permittees. A group of Cities associated with a particular watershed/sub-watershed can lobby their respective local, state, and federal elected representatives for funding for such things as conducting TMDL-related monitoring and structural controls to meet TMDLs.
5. Smaller Cities, in general, generate less pollution than larger municipalities. This is largely due to the fact that political and administrative authorities tend to be more responsive to citizens because they are more accessible and politically sensitive than their counterparts in larger municipalities. As a result, streets are swept more often, catch basins are cleaned-out more frequently, complaints of illicit discharge (including dumping), illicit connections, and improper management of pet waste on public and private property are responded to more quickly. Beyond this, smaller Cities tend to be more concerned with

Upper San Gabriel River Watershed Coalition
Report on Watershed Discharge

open space (having more of it) and parks (having more of them) and with aesthetics, including more vegetation on public and private property, and prohibited or limited overnight parking. This amounts to less urbanization and lower runoff coefficients than larger municipalities. The citizens of small Cities also tend to be more committed to cleaner environments. This is because they have a stronger sense of community. Citizens know they can have a strong influence on policy and political decision makers to provide attractive, clean, and safe environments. Further, smaller Cities have fewer industrial and commercial facilities⁴ and are more closely regulated for code compliance (which, among other things, requires cleaner and less polluting environments).

6. Although not all Cities located in the Upper San Gabriel River Watershed are a party to this application, the Applicants intend to encourage other Permittees that are located in this watershed to be a part of the unified Los Angeles County ROWD. The Applicants objective is to form a nucleus for the future development of a watershed-based MS4 Permit -- a concept which many affected parties, including members of the environmental community, would agree has been long overdue in being realized. Initially, the Applicants would do basic "advance" work in laying the foundation for a watershed based MS4 Permit. This would include identifying specific pollutants of concern (as determined by the 303(d) list. The Applicants would revise their SQMPs to include objectives aimed at targeting a TMDL or a high priority pollutant of concern that has the potential to become a TMDL, through a concentrated and coordinated effort. For example, public education outreach could be re-tuned to be truly pollutant-specific. Initially, brochures and articles could be developed for a variety of TMDL or priority pollutants including trash, bacteria (fecal matter in particular), and selected metals. These print media would specifically identify pollutant sources and BMPs (including behavioral changes) that mitigate them. Also, the

⁴This does not include industrial Cities. However, even industrial Cities, which tend to be small in area, are actually sensitive to being less pollution generating than industrialized areas of large municipalities. City Councils and Managers recognize that they must be cleaner because the public tends to view them as being inherently pollutant generating. For example, compare the City of Vernon, Commerce, or Industry with industrialized portions of the City of Los Angeles.

Upper San Gabriel River Watershed Coalition
Report of Progress Meeting

Standard Urban Stormwater Mitigation Plan (SUSMP) could be re-focused to target a TMDL or high priority pollutant of concern, in terms of post-construction structural controls. As it is now, the SUSMP is really a non-specific pollution mitigation requirement. In addition, spreading grounds and percolation basins could be used to infiltrate TMDL or high priority pollutants. These and other regional solutions would be sensible and cost-effective.

7. To encourage participation in watershed matters involving other stakeholder agencies and organizations in the watershed, including, but not limited to: San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy; San Gabriel Basin Water Quality Authority; Main San Gabriel Basin Watermaster, and the Upper San Gabriel Municipal Water District.

8. The Applicants hope that the Permittees located in the Upper San Gabriel River watershed, but are associated with the Los Angeles County MS4 permit, will be allowed "cross-over." This could be formally achieved through a re-opener clause, or informally by simply allowing Permittees to participate, without changing MS4 permit affiliation.

Upper San Gabriel River Watershed Coalition
Report of Waste Discharge

Section 2 Applicant Information

2.1 Municipal Applicants

The Permittees identified in Table 1 have elected to participate in this separate ROWD application. These Applicants have chosen to participate in group MS4 NPDES Permit that shall be known as the Upper San Gabriel River Watershed Coalition (hereinafter "USGR Watershed Coalition").

Table 1 — Table of Municipal Applicants
Upper San Gabriel River Watershed Coalition

City	Population	Area (square miles)	% in San Gabriel River Watershed	% in Los Angeles River Watershed
Azusa	44,712	9.0	100	0
Claremont	33,998	11.0	90	0
Glendora	49,415	19.5	100	0
Irwindale	1,446	9.0	80	20
Whittier	83,680	12.5	100	0

It should be noted that the Principal Permittee has indicated that neither the Watershed Management Division nor the Los Angeles County Flood Control District of the Los Angeles County Department of Public Works wishes to be an Applicant under this ROWD. Nevertheless, the Applicants will continue to encourage the County to participate in watershed activities because of its flood management role.

2.2 Applicant Contact Information

The table below contains the names of contact persons associated with this MS4 NPDES Permit application.

Applicant	Contact	Title	Address
Azusa	Michael Scott	City Engineer	213 E. Foothill Blvd. Azusa, CA 91702
Claremont	Craig Bradshaw	City Engineer	207 Harvard Avenue P.O. Box 880 Claremont, California
Glendora	Dave Davies	Deputy Director of Public Works	116 E. Foothill Blvd Glendora, CA 91741
Irwindale	Kwok Tam	Director of Public Works	5050 N. Irwindale Ave Irwindale, CA 91706

Upper San Gabriel River Watershed Coalition
Report of Waste Discharge

Whittier	David Mochizuki	Director of Public Works	13230 Penn Street Whittier, CA 90602-1772
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Section 3 Program Accomplishments

3.1 Storm Water Quality Management Program

In accordance with the Los Angeles County MS4 Permit, the ROWD Applicants have implemented Storm Quality Water Management Programs based largely on the models developed by the Principal Permittee in 2002. The purpose of the Storm Quality Water Management Plan (SQMP) is to protect receiving waters, including: rivers, lakes and oceans from contamination in runoff.

This is to be achieved by doing two basic things: control pollutants in storm water runoff and (2) prohibit illicit discharges and connections through which they are conducted. These two general objectives are intended to reduce pollutants in storm water and non-storm water discharges to the MS4 to the maximum extent practicable (MEP) and underlie each of the SQMP program components, including: (1) program management; (2) development construction; (3) development planning; (4) illicit connection/discharge detection and elimination (ICID), (5) public information participation; (6) public (municipal) agency; and (7) industrial/commercial facilities control. The monitoring program is also an MS4 NPDES permit required specifically under federal storm water regulations, which shall be discussed in detail under Section 5.

Each of the Applicants have implemented fully each of these program components. As to what extent has the implementation of these programs under the current MS4 permit been effective in reducing storm water and non-storm water runoff pollution ("runoff pollution") is uncertain. However, it must be assumed that the implementation of the SQMP has resulted in reducing runoff pollution to some extent. A more difficult question is has the implementation of the SQMP improved water quality in the affected received waters? Unfortunately, the Applicants cannot answer this question because there is no specific monitoring data available to provide an answer.

It should be noted, that although the SQMPs have been fully implemented, they are in need of enhancement and revision to accommodate the watershed approach on which this application is

Report to the USGR Watershed Coalition
Report on Water Discharge

based. To that end, a detailed discussion of how each program can be improved is provided under Section 4.0.

Section 4.0 Priorities for Program Improvement

4.1 Program Components

Municipal stormwater and urban runoff management programs in the Los Angeles region were initiated with the June 18, 1990 adoption of Order No. 90-079. A revised Los Angeles County MS4 Permit was issued in July 1996, and another in December 2001 (Order No. 01-182). Permittees currently find themselves near the end of this third Permit cycle and have conducted in-depth reviews of their current management programs with an eye toward continued improvement. Program improvement and effectiveness is a priority for Permittees for many reasons. Permittees have an obligation to responsibly manage public funds as well as to protect the quality of the environmental resources within their jurisdictions. In addition, Permittees in the Los Angeles region recognize that effectively managing the impacts of stormwater and urban runoff in a cost effective manner is in the best interest of all County residents.

This section discusses issues and concepts identified by the Applicants as key factors in improving their management programs during the upcoming Permit cycle. These issues and recommendations have general applicability across multiple program elements. The Applicants, as Permittees under the current Los Angeles County MS4 Permit, have implemented programs that meet and often exceed the basic provisions of the existing Permit. Nevertheless, they appreciate, based on their experience of implementing the programs required under MS4 Permit in the Los Angeles Region, that there is a need for continued progress guided by a BMP-based "iterative approach." This is an approach that is based on the time honored principle of "trial and error."

As will be further discussed in the balance of the ROWD, the Applicants intend to incorporate these storm water quality management principles into their programs, and are committed to their improvement during the next Permit cycle. Based on their experience in developing and implementing programs, the Applicants have determined that aspects of existing programs can be significantly enhanced. The proposed enhancements to the existing programs will allow for improved implementation and cost-effective

operations, thus allowing for the reallocation of funds and resources to other problem areas to achieve water quality protection, without, hopefully, having to sacrifice municipal programs and services.

Against this background, the balance of this section offers a more detailed discussion of enhancements for the continued improvement of Applicant programs; and the types of changes that they, as current Los Angeles County MS4 Permittees, have determined to be necessary under the next Permit. To a large extent, doing this will depend on how compliance is gauged and what process is chosen to oversee and evaluate Permit programs. In the view of the Applicants, specific improvements can be achieved through the framework of a modified Los Angeles County MS4 permit.

4.2 Priorities for Program Enhancement

In this section, enhancements to SQMP program components, along with suggested revisions to MS4 permit requirements, shall be discussed, including:

- MS4 NPDES Permit Definition Changes
- Receiving Water Limitation Language
- Program Management
- Development Construction
- Development Planning
- Illicit Connection and Discharge Detection and Elimination
- Discharge Prohibitions (non-storm water discharge exemptions)
- Public Agency ("Municipal Agency")
- Public Information Program Participation
- Industrial and Commercial Facilities Control
- Monitoring Program

4.3 Priority 1 - Definition Changes

▪ Eliminate the Definition of Illicit Disposal

The definition section of the current Los Angeles County MS4 Permit provides a definition of illicit disposal, which means "any disposal, either intentionally or unintentionally, of material(s) or waste(s) that

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The applicants prefer this definition because: (1) many of them already have it written into their existing runoff control ordinances (most other jurisdictions in California use it as well); and (2) from an enforcement perspective, this definition makes it clear that any illicit discharge that passes through a connection is an illicit one, notwithstanding that it may be "permitted." The concern is that the owner or operator of an illicit connection could evade enforcement by claiming, for example, that the connection is covered under an encroachment permit. It should also be noted that the Applicants suspect that the reason few illicit connections are noted in their Annual Reports to the regional board is because of the current definition of an illicit connection.

- **Eliminate the Definition of Local SWPPP**

Local SWPPP is defined under the current Los Angeles County MS4 permit as the "Storm Water Pollution Prevention Plan by the local agency for a project that disturbs one or more acres (sic.) of land." This definition has been rendered inaccurate as the result of the revision contained in the current Los Angeles County MS4 permit that changed the requirement for General Construction Storm Water Activity Permit (CGASWP) in March of 2003 coverage from 5 acres (by grading, clearing, and/or excavating) to 1 acre. Further, the Permit also allows for a substitution of a State SWPPP, "if the local SWPPP is at least as inclusive in controls and BMPs as the State SWPPP."

Requiring a Local SWPPP to substitute for a State SWPPP is redundant and would make the Applicants responsible for assuring that the Local SWPPP is essentially equivalent to the State SWPPP – a responsibility that the Applicants are averse to accepting, given the complexity of the State SWPPP. The Applicants, therefore, recommend eliminating the requirement for a Local SWPPP and using the State SWPPP requirement under the General Construction Storm Water Activity Permit (GCASWP) instead; and therewith, eliminating the definition of L-SWPPP from the MS4 permit for which the Cities herein are applying.

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▪ **Revising the Definition of Maximum Extent Practicable (MEP)**

Under the current Los Angeles County MS4 Permit, MEP is defined as follows:

"Maximum Extent Practicable (MEP)" means the standard for implementation of storm water management programs to reduce pollutants in storm water. CWA § 402(p)(3)(B)(iii) requires that municipal permits "shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods, and such other provisions as the Administrator or the State determines appropriate for the control of such pollutants. See also State Board Order WQ 2000-11 at page 20.

The Applicants, however, find this definition unreasonably stringent and prefer the following as a replacement definition:

"Maximum Extent Practicable" or "MEP" is the standard established by Congress in Clean Water Act § 402(p)(3)(B)(iii) that municipal dischargers of stormwater MS4s must meet. For the purpose of this Order, MEP is generally, but not necessarily, less stringent than best available control technology, the standard which industrial dischargers of stormwater must meet. MEP generally emphasizes pollution prevention and source control and includes consideration of technical feasibility, practicability, cost effectiveness, benefit derived, regulatory compliance and public acceptance. Where cumulative cost exceeds cumulative benefit, a program or BMP is not considered practicable.

4.4 Priority 2 - Receiving Water Limitations

Receiving Water Limitations language in Order No. 01-182 is a section of the 2001 Permit that is the subject of the pending legal challenge. The Applicants recommend that the Permit contain Receiving Water Limitations language which is consistent with applicable law and with which the Applicants can comply. Aforementioned Order No. 96-054, (the 1996 Los Angeles County MS4 Permit) included language which stated "Timely and complete

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implementation by a Permittee of the storm water management programs prescribed in this Order shall satisfy the requirements of this section and constitute compliance with receiving water limitations." It further provided that where an exceedance of a water quality objective had occurred, that the Permittees were to submit stormwater programs that "will increase the likelihood of preventing future exceedances of water quality objectives."

This language was subsequently omitted by the Regional Board in Order No. 01-182. It is imperative that the Applicants have the support of the Regional Board when making a good faith effort to comply with Permit requirements, and that the Applicants not be required to implement BMPs that go beyond MEP or reasonableness standards under federal and state law.

Applicants must first be given an opportunity to work with the Regional Board to fine-tune programs that are not successful at meeting Receiving Water Limitations. Applicants, as municipal Permittees should not be required to strictly comply with water quality standards/objectives. Rather, compliance with such standards should be limited to compliance through the use of reasonable and cost-effective MEP-compliant BMPs, effectuated through an iterative process. Forcing Applicants to be in a never-ending state of non-compliance, and requiring them to strictly comply with water quality standards/objectives that are not reasonably achievable or practicable, is arbitrary and capricious, and contrary to law. Further, exposing the Applicants to immediate third party lawsuits is unproductive, discourages collaborative working relationships with non-governmental organizations, and does not achieve the primary goal of improving water quality.

The following are proposed Findings of Fact and suggested Receiving Water Limitations for the Applicants new MS4 permit:

• **Findings of Fact**

1. Urban Runoff includes discharges from residential, industrial, commercial, and construction areas within the Permit Area. In addition to Urban Runoff, the MS4s regulated by this order receive flows from agricultural activities, open space, state and federal

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properties and facilities, schools, colleges and universities, and other land uses not under the control of the Permittees.

2. The Permittees lack legal jurisdiction over discharges into their respective MS4s from agricultural activities, California and federal properties and facilities, school districts, colleges and universities, utilities and special districts, wastewater management agencies, and other point and non-point source discharges otherwise permitted by or under the jurisdiction of the Regional Board. The Regional Board recognizes that the Permittees cannot be held legally responsible for any discharges or pollutants, either in stormwater or non-stormwater, running off of any such property or facility. Similarly, certain activities that generate pollutants present in Urban Runoff are beyond the control or the authority of the Permittees to regulate. Examples of these include operation of internal combustion engines, atmospheric deposition, brake pad wear, tire wear, residues from application of pesticides, nutrient runoff from agricultural activities, leaching from privately-operated onsite wastewater treatment systems (OWTSs), and background conditions (e.g. wildlife, and leaching of naturally occurring minerals, metals, and other elements from local geology).
3. The Regional Board finds that the unique aspects of the regulation of Urban Runoff discharges through MS4s, including but not limited to the intermittent nature of discharges, and difficulties in monitoring and limited physical control over the discharges, will require adequate time and resources to determine what persons or entities are responsible for reducing the discharge of pollutants in Urban Runoff discharged from the MS4.

- **Receiving Water Limitations Revision**

The receiving water limitations language in the current Los Angeles County MS4 Permit effectively holds Permittees responsible for any discharge from their MS4 that causes or contributes to a nuisance -- even if they have no control over the source of the discharge or the discharge itself. Repeated exceedances would require a revision to the Storm Water Quality Management Plan (SQMP) to include additional or intensified BMPs at the direction of the Regional Board.

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Therefore, the Applicants prefer the inclusion of the following substitute receiving water limitations language:

1. The Permittees shall implement BMPs to attempt to reduce the discharge of pollutants in Urban Runoff discharged from the Permittees' MS4s where such Urban Runoff causes or contributes to an exceedance of water quality standards and objectives.
2. The Permittees shall comply with Paragraph 1 through the use of reasonable and cost-effective MEP-compliant BMPs. Only those water quality standards/objectives which can reasonably be achieved, considering the economic impacts of compliance, the impacts on housing within the region, and the past, present and probable future beneficial uses of the receiving water, need be complied with under this Order. In determining whether any particular water quality standard/objective is appropriately applied to a Permittee, in addition to the above, the Regional Board shall also consider the environmental characteristics of the hydrographic unit in issue, including the quality of the water available to the hydrographic unit, and all demands being made and to be made on the waters, and the total values involved, beneficial and detrimental economic and social, tangible and intangible. Compliance with applicable water quality standards/objectives is to occur through an iterative BMP process and be consistent with the provisions of this paragraph.
3. If an exceedance of a water quality standard/objective is caused or is believed to be caused to discharges to the MS4 that are outside the Permittees jurisdiction or control, the Permittees shall advise the Executive Officer of such in writing.
4. If the Permittees have acted reasonably and in good faith in complying with the procedure set forth above, and are implementing the revised SQMP, the Permittees do not have to repeat the same procedure for continuing or recurring exceedances of the same water quality standards/objectives, unless the Executive Officer determines that additional BMPs, consistent with Section 2 above, should be implemented to comply with applicable water quality standards/objectives, and provides written notice to the Permittees of this determination and the basis

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for the determination. Reasonable and good faith compliance with the procedures set forth in this section shall satisfy the requirements of this Order and shall constitute compliance with applicable water quality standards/objectives.

4.5 Priority 3 – Watershed Management Committee

Under the current Los Angeles County MS4 Permit the County of Los Angeles Flood Control District is designated as the Principal Permittee while 87 other municipalities within the Los Angeles County Flood Control District are designated as Permittees. As stated in the Los Angeles County MS4 NPDES permit, "the Principal Permittee shall:

1. Coordinate and facilitate activities necessary to comply with the requirements of this Order, but is not responsible for ensuring compliance of any individual Permittee.
2. Coordinate permit activities among Permittees and act as liaison between
3. Permittees and the Regional Board on permitting issues.
4. Provide personnel and fiscal resources for the necessary updates of the SQMP and its components.
5. Provide technical and administrative support for committees that shall be organized to implement the SQMP and its components.
6. Convene the Watershed Management Committees (WMCs) constituted pursuant to Part F [of the current MS4 Permit] upon designation of representatives.
7. Implement the Countywide Monitoring Program required under this Order and evaluate, assess and synthesize the results of the monitoring program.
8. Provide personnel and fiscal resources for the collection, processing and submittal to the Regional Board of annual

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reports and summaries of other reports required under the SQMP.

9. Comply with the Responsibilities of the Permittees in Part 3. E [of the MS4 NPDES permit].”

Permittees under the Los Angeles County MS4 NPDES are required to:

1. Comply with the requirements of the SQMP and any modifications thereto.
2. Coordinate among its internal departments and agencies, as appropriate, to facilitate the implementation of the requirements of the SQMP applicable to such Permittee in an efficient and cost-effective manner.
3. Designate a technically knowledgeable representative to the appropriate WMC.
4. Participate in intra-agency coordination (e.g. Fire Department, Building and Safety, Code Enforcement, Public Health, etc.) necessary to successfully implement the provisions of this Order and the SQMP.
5. Prepare an annual Budget Summary of expenditures applied to the storm water management program.

The Applicants shall be known collectively as the Upper San Gabriel River Watershed Coalition (USGRWC). Instead of designating a Principal Permittee the Applicants shall collectively perform the following tasks in a manner to be determined no later than six months after the adoption of the MS4 permit:

1. Coordinate and facilitate activities internally, among impacted City departments and divisions therein, necessary to comply with the MS4 NPDES Permit, excluding the responsibility for ensuring compliance on behalf of any individual Applicant.

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2. Coordinate permit compliance activities among the Applicants and liaise with the Regional Board on various issues, including but not limited to MS4 Permit requirements, establishing watershed goals and objectives, and discussing and implementing pollutants of concern, including pollutants that are subject to total maximum daily load (TMDL) status.
3. Discuss and recommend methods of updating the Storm Water Quality Management Plan ("SQMP") that was developed by the Principal Permittee under the current MS4 NPDES permit.
4. Discuss and recommend a watershed approach to address pollutants of concerns within reaches and tributaries therein through the implementation of appropriate Best Management Practices ("BMPs").
5. Convene regularly scheduled USGR Watershed Management Committee (WMC) meetings to discuss MS4 permit compliance and watershed issues.

4.6 Priority 4 – Industrial and Commercial Facilities Control Program

Pursuant to the current Los Angeles County MS4 Permit, the Permittees were required to track, inspect, and ensure compliance at industrial and commercial facilities that the Regional Board has asserted are critical sources of pollutants in stormwater. These provisions in Order No. 01-182 are presently being challenged by many of the 2001 Permittees in the pending legal challenge – including several of the Applicants.

The Applicants propose that the so-called "Critical Sources" referenced in the current Los Angeles County MS4 Permit, such as commercial facilities (restaurants, automotive service facilities, retail gasoline outlets and automotive dealerships), and Phase I Facilities (both Tier 1 and 2), not be inspected under the renewed permit, unless the Applicants first determine that the facility is an industrial facility that it is contributing a substantial pollutant load to the MS4.

There is no authority under State or federal law for requiring the Applicants to inspect commercial facilities, such as restaurants,

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gasoline service stations, or automobile dealerships or any other commercial facilities. For industrial facilities, the federal regulations leave it to the Permittee to determine which facilities to inspect, and when, and provide for the inspection of those industrial facilities which the Permittee determines are contributing a substantial pollutant load to the MS4. Accordingly, the Applicants request that the existing Industrial and Commercial Facility Control Program requirements under Order No. 01-182 be deleted from the Permit, and replaced with language which provides the Applicants the discretion to inspect those industrial facilities it determines are contributing a substantial pollutant load to the MS4.

Further, many Permittees – including the Applicants -- found it unnecessary and a waste of resources to repeatedly inspect facilities that are found to be in compliance with the General Industrial Activities Stormwater Permit (GIASP). A much more effective inspection strategy would be to repeatedly target industrial facilities that are not in compliance and where the Permittee determines the industrial facility has contributed a substantial pollutant load to the MS4.

Moreover, for those industrial facilities that the Applicants determine require inspection, the Applicants recommend that the Annual GIASWP inspection fees collected by the State Water Resources Control Board be distributed to the Applicants for conducting such industrial facility inspections. This would encourage and assist the Applicants and other Permittees in conducting such inspections, and would avoid private industry from either paying two inspection fees for a single inspection, or being subject to redundant inspections. In addition to the legal objections to the inspection program in Order No. 01-182, financial constraints make it difficult for the Applicants to carry out the level of inspections required under Order No. 01-182. Providing local agencies with sufficient monetary resources will facilitate more inspections by the Applicants.

Further, the current Los Angeles County MS4 Permit, under attachment "B," suggests that laundries are subject to the industrial/commercial inspection program as a commercial facility. It appears, however, that including laundries as commercial facilities that are subject to inspection requirements specified in the current

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Los Angeles County MS4 Permit is inappropriate and, appears to be a "continuity error" -- similar to the 1996 Los Angeles MS4 permit's inclusion of gas stations under the category of industrial facilities, which is incongruous because they are in fact commercial facilities. To put it another way, neither laundries nor dry cleaners are mentioned under the Industrial/Commercial Facilities Control Program as critical sources. Laundries are only referenced under appendix B.

Laundries are also not dry cleaners, as some Permittees, including the Principal Permittee have determined. Appendix B refers to laundries, under Tier 2 facilities, as SIC (standard industrial classification) 72. Actually, SIC 72 is defined as "personal services," not laundries. Actually SIC 72, "laundries," does not even exist. What does exist is SIC 721 "laundry, cleaning, and garment services." It has been suggested that SIC 72 refers to dry cleaning facilities as well. However, using the term "laundries" effectively excludes dry cleaners. They are not the same. The definition of laundry, according to Webster's New World Dictionary, "is a room with facilities for laundering." Also according to Webster, launder (derived from the Latin verb "lavar"), means "to wash or wash and iron" -- not to dry clean, which of course involves a totally different process.

Additionally, laundries are not referenced under the Industrial and Commercial Facilities Control Program (section 4.C) of the current Los Angeles County MS4 permit as "critical sources." The purpose of industrial/commercial facilities control program is to inspect critical sources for BMPs or the need for BMPs that reduce pollutants in storm water runoff. Section 4.C, the permit specifies requirements for inspecting commercial facilities, including restaurants, automotive service facilities, and retail gasoline outlets and automotive dealerships. These requirements include the implementation/non-implementation of use-specific BMPs (e.g., "posts signs close to fuel dispensers, which warn vehicle owners/operators against "topping off" of vehicle fuel tanks and investigation of automatic shutoff fuel dispensing nozzles" as in the case of RGOs. Since laundries are not included as a critical source under this section, Permittees are challenged with determining what they should be inspected for.

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Beyond this, laundries are not referenced under the findings section of the MS4 permit as a critical source. In contrast, findings 8 through 11, address pollutants associated with certain industrial as well as certain commercial facilities (viz., automotive-related facilities, gas stations, and restaurants). Especially noteworthy is finding 8, which identifies "seven high priority industrial and commercial critical source types." Conspicuously absent among them are laundries and dry cleaning establishments. It is difficult to comprehend what activities associated with laundries would have an impact on storm water runoff. Typically, laundries are indoor operations. Therefore, there is no exposure of pollutant materials to storm water runoff. In terms of non-storm water discharges, wash water associated with laundries is not a tremendous pollution problem because it is discharged to the sanitary sewer system (a plumbing code requirement). It is difficult to imagine what pollutant materials would be stored outdoors at a laundry facility. The same could be said of dry cleaners as well.

Lastly, laundries are not referenced under the legal authority section of the MS4 permit. Section 3.G of the current Los Angeles County MS4 Permit, which addresses legal authority, does not suggest that Permittees should establish legal authority to control pollutants in storm water from laundries or dry cleaners. This poses a serious problem for enforcement in terms of accessing the premises for inspection. If a laundry refuses entry, it would be very difficult for a Permittee to convince a City Attorney -- let alone a magistrate -- that it has adequate legal authority to inspect such establishments for reasons other than illicit discharges or connections.

4.7 Priority 5 – Peak Flow Control and Standard Urban Storm Water Mitigation Plan (SUSMP)

The Applicants propose that the Development Planning Program provisions as contained in Order No. 01-182 be deleted and not carried forward into the next permit. Again, these provisions under Order No. 01-182 are being challenged by many of the Permittees, as the State and Regional Boards are without authority to impose these provisions, and as such program provisions are inconsistent with state and/or federal law.

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Continuing to require compliance with the SUSMP provisions is to require compliance with a particular design criteria or other particular manner of compliance, which is contrary to the prohibition under California Water Code section 13360. In addition, continuing to require compliance with the SUSMP provisions, and to compel municipalities to impose certain mitigation measures to mitigate undefined impacts from runoff from numerous "development" and "redevelopment" projects, irrespective of what mitigation measures may or may not be properly required under CEQA, and the review process set forth therein, is an arbitrary action contrary to law, and the Regional and State Boards lack the authority to impose any such requirements.

In addition, the Peak Flow Control provisions included in the current Los Angeles County MS4 Permit exceed the Regional and State Boards' authority, and are contrary to law, as neither the Clean Water Act, nor the Porter-Cologne Act authorizes the State to regulate the "quantity" of storm water or urban runoff.

The State and Regional Boards should also consider the impacts that the Development Planning Program provisions will have on the development of low income/affordable housing as required under Water Code section 13241(e) and 13263.

4.8 Priority 6 – Remove Unnecessary Language from Development Planning Requirements

The first paragraph under 4.D of the current Los Angeles County MS4 Permit reads as follows:

- Minimize impacts from storm water and urban runoff on the biological integrity of Natural Drainage Systems and water bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 21100), CWC § 13369, CWA § 319, CWA § 402(p), CWA § 404, CZARA § 6217(g), ESA § 7, and local government ordinances ;
- Maximize the percentage of pervious surfaces to allow percolation of storm water into the ground;

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- Minimize the quantity of storm water directed to impervious surfaces and the MS4;
- Minimize pollution emanating from parking lots through the use of appropriate Treatment Control BMPs and good housekeeping practices;
- Properly design and maintain Treatment Control BMPs in a manner that does not promote the breeding of vectors; and
- Provide for appropriate permanent measures to reduce storm water pollutant loads in storm water from the development site

Each of these requirements is unnecessary. They were carried over from the 1996 Los Angeles County MS4 Permit without taking into account that most of them were obviated by revisions made to the Development Planning Program under the current Los Angeles County MS4 Permit. These include:

- Minimize impacts from storm water and urban runoff on the biological integrity of Natural Drainage Systems and water bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 21100), CWC § 13369, CWA § 319, CWA § 402(p), CWA § 404, CZARA § 6217(g), ESA § 7, and local government ordinances
- Maximize the percentage of pervious surfaces to allow percolation of storm water into the ground
- Minimize the quantity of storm water directed to impervious surfaces and the MS4
- Provide for appropriate permanent measures to reduce storm water pollutant loads in storm water from the development site

Requiring treatment control BMPs to prevent vector breeding was rendered superfluous by the maintenance agreement requirement under the current Development Planning Program. Further, this requirement does not take into account that some treatment controls will often contain some storm water or non-storm water that can

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attract vectors (that can breed in a cup of water) – notwithstanding maintenance.

4.9 Priority 7 – Specific BMP Requirements

Under Order No. 01-182, all Permittees were required to place and maintain trash receptacles at all transit stops within their jurisdiction.

Prescriptive requirements such as this limit the ability of Permittees to analyze and determine the cost effectiveness and appropriateness of BMPs to address pollutants of concern. The Applicants worst-case fear is that the Regional Board could impose upon them and other Permittees structural control requirements to address a pollutant of concern, expressed as a priority pollutants, such as trash and bacteria, without demonstrating that such pollutants impair the beneficial use(s) of a receiving water.

Instead, it is recommended that the Applicants be given the flexibility to select suitable BMPs to address pollutants of concern. The Applicants recommend that the explicit requirement to place and maintain trash receptacles at all transit stops be removed from the current Los Angeles County MS4 Permit and any successor MS4 Permit issued to the Applicants, as it is presently the subject of the legal challenge to Order No. 01-182. Moreover, any such mandates to be imposed upon the Applicants may only be imposed, under the California Constitution, if appropriate funds have been provided to the Permittees to fund the mandate.

4.10 Priority 8 – Development Construction Improvements

The General Construction Activities Stormwater Permit (GCASWP), Order No. 99-08-DWQ, requires all dischargers, where construction activities disturb one or more acres soil by grading, clearing, and/or excavating, to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), eliminate or reduce non-stormwater discharges to storm drain systems and other waters of the United States, and perform inspections of all BMPs. The current Los Angeles County MS4 Permit allows, as mentioned under *Section 4.3 Priority 1 - Definition Changes*, a Local SWPPP to substitute for a State SWPPP. The Applicants, again, recommend eliminating this

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requirement, which is also the subject of the legal challenge to Order No. 01-182. It is a confusing requirement that makes the Permittees responsible for assuring that the L-SWPPP is essentially equivalent to the State SWPPP.

Further, the Applicants also propose that the Development Construction Program requirements as set forth under Order No. 01-182, be modified in the renewed permit so that the Applicants not be required to impose "minimum" unreasonable requirements on construction sites, such as unreasonable restrictions on the discharge of sediment or construction related material (including sand, gravel and other natural material) that may be discharged from a construction site. This concern is also the subject of the pending legal challenge.

Since the current Los Angeles County MS4 Permit requires Permittees to conduct at least one inspection of construction sites that are covered under a GCASWP, the Applicants believe that they should be reimbursed for this task. As is the case with the GIASWP, the regional board imposes a GCASWP fee on such construction projects. It is only fair and reasonable to ask for a share of that fee which, ostensibly, is to cover the cost of inspection.

The Applicants also recommend the de-watering of storm water to the MS4 from de-silting basins or ponds -- provided that such discharge has been detained long enough to cause sediment to settle-out prior to being released to the MS4.

4.11 Priority 9 – Illicit Connection/Discharge Detection and Elimination Improvements

Permittees are currently required to eliminate all illicit connections and illicit discharges to the storm drain system, and to document, track, and report all occurrences. The Permit requires the field screening of open channels, underground pipes less than 36" and underground pipes with a diameter of 36 inches or greater by specific dates. Based on an annual evaluation of patterns and trends of illicit connections and illicit discharges, it can be concluded that the following land use types contributed an average of 62.2% of all illicit connections and 81.5% of all illicit discharges discovered:

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- High Density Single Family Residential
- Retail and Commercial
- Light Industrial
- Multiple Family Residential
- Transportation

The Applicants recommend that field screening be concentrated in the five land use types above to maximize resources and target the areas where most illicit connections and illicit discharges are currently found. It is recommended that field screening in other land use types be optional since Applicants resources are limited.

As mentioned under *Section 4.3., Priority 1 - Definition Changes*, the Applicants also recommend that the term "illicit disposal" be removed from the definitions section of the Permit since it serves no purpose and is not used anywhere else in the Permit.

It should be noted that the Applicants do not share the view that the current definition of illicit discharge requires redefinition to mean "any discharge to a constructed storm drain ..." While the applicants understand the need for such revision, the definition of illicit discharge is fixed under federal regulations and, for this reason, cannot be altered. For example, what if there is an impermissible non-storm water discharge directly to a receiving water body by way of conveyance that is not a storm drain? Under the proposed redefinition of illicit discharge, this discharge would not be considered as one.

4.12 Priority 10 – Potable Water Discharge Exemption

The discharge exemption for potable drinking water supply and distribution system releases makes reference to American Water Works Association (AWWA) guidelines for dechlorination and suspended solids reduction practices. Permittees have determined that these AWWA guidelines do not exist. Therefore, it is recommended that the AWWA reference be removed from the Permit.

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4.13 Priority 11 – Additional Non-Storm Water Discharge Exemptions

The Applicants seek further exemptions for discharges that may be considered illicit under the current Los Angeles County MS4 permit, including:

- Exemption of wash water discharges associated with non-commercial car wash activities, except wash water that consists of de-ionized water used to remove dust from vehicles
- Exemption of wash water discharges associated fire with and other emergency vehicles that cannot be taken off-line without risk public health and safety.

The justification for requesting these discharge exemptions rests on the fact that: (1) with the exception of the City Whittier, the Applicants all drain fully into spreading grounds and other infiltration facilities; and (2) the amount of pollutants (surfactants, sediment, metal particulates, tire dust, etc.) from these sources are probably not in significant concentrations to pose an impairment to any beneficial use, including ground-water recharge.

However, for drainage areas that do not provide infiltration, it is recommended that impacted Applicants and other Permittees be allowed within their jurisdictions to permit the discharge of wash water to enter any component of the MS4, except the catch basin sump, provided that BMPs are implemented to prevent the discharge from entering the catch basin sump (e.g., blocking the inlet with sand bags or covering it with an impermeable material such as viscaine); and to remove the resulting ponded discharge using a wet vacuum or other similarly effective device or method.

4.14 Priority 12 – Legal Authority

The task of amending or adopting a Permittee-specific stormwater and urban runoff ordinance to enforce all requirements of the Permit

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takes a significant amount of time to complete. It is recommended that the Applicants be allowed a minimum of 12 months from the date of Permit adoption to complete all necessary changes to possess adequate legal authority to comply with the new Permit.

4.15 Priority 13 – Annual Report Enhancements

Applicants recommend streamlining the Municipal Stormwater Permit Annual Report to only require the reporting of significant records that demonstrate BMP effectiveness and compliance with the implementation of SQMP components to reduce the discharges of pollutants in stormwater to the MEP. Redundant requirements such as the preparation of an assessment of the effectiveness of SQMP requirements to reduce stormwater pollution which evaluates watershed-wide assessments conducted by each WMC is unnecessary and a waste of resources. A Principal Permittee assessment of the Permittee assessments is excessive and redundant and does not provide any new information that could not be concluded from reviewing watershed-wide assessments. It is recommended that only one assessment per watershed be required.

Many Permittees have had difficulties in submitting Annual Reports by the October 15th deadline. Problems exist with the short timeframe that Permittees are given between the end of the fiscal year (typically June 30) and the deadline for submitting Annual Reports to the Principal Permittee so that data can be compiled and summarized by the Principal Permittee for submittal by October 15th. This limited time period is not sufficient for Permittees to coordinate with internal divisions or departments to gather all the final information needed to compile their Individual Annual Report. In addition, adequate time is not given for financial numbers to be finalized. This preliminary information and data may affect the accuracy of Permittee reporting. Permittees recommend changing the Annual Report deadline from October 15th to November 15th of each year.

Permittees consider some information required for the Annual Report to be irrelevant to achieving the goals of the Permit. It is recommended that the following Annual Report questions be eliminated:

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- Section IV.C.7 – How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- Section IV.C.8 – What is the percentage of total development projects that were conditioned to meet SUSMP requirements?
- Section IV.D.5 – How many building/grading permits were issued to sites requiring Local SWPPPs last year?
- Section IV.D.6 – How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Stormwater Permit last year?
- Section IV.D.7 – How many building/grading permits were issued to construction sites less than one acre in size last year?

The following Annual Report tables should be modified to eliminate confusion and improve the quality of data submitted:

Section IV.F.10 – Delete and replace with the following illicit connections table:

Illicit Connections Table

Number of Suspected Illicit Connections Reported	Number of Suspected Illicit Connections Investigated	Number of Illicit Connections Terminated	Number of Suspected Illicit Connections found not to be Illicit	Number of Suspected Illicit Connections that resulted in Enforcement Action
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Section IV.F.13 – Delete and replace with the following illicit discharges table:

Illicit Discharges Table

Number of Suspected Illicit Discharges Reported	Number of Suspected Illicit Discharges Investigated	Number of Illicit Discharges Terminated	Number of Suspected Illicit Discharges found not to be Illicit	Number of Suspected Illicit Discharges that resulted in Enforcement Action
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The Applicants also recommend that the reporting requirements for industrial and commercial inspections be revised to remove confusing

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and extraneous information. More specific recommendations shall be provided during MS4 Permit discussions with the Regional Board.

4.16 Priority 14 – Public Information and Participation Program Revision

The Applicants have been reliant mostly on the public information program developed by the Principal Permittee under the Los Angeles County MS4 permit. The Applicants are compelled to conclude that the Public Information and Participation Program (hereinafter "PIPP") has met its targets in reaching out to general and specific audiences on the importance of runoff pollution prevention.

However, in terms of watershed-specific outreach, the Applicants believe that the PIPP can be strengthened to (1) increase awareness of those pollutants that have either reached total maximum daily load status or high priority 303(d) list status, and how such pollutants impair water quality; and (2) work with the Principal Permittee in developing outreach materials to alter behaviors that give rise to watershed-specific pollution. The Applicants believe that an effective PIPP may, along with the implementation of institutional and structural BMPs, preempt elevating a priority pollutant to TMDL. In deed, PIPP should be the first step in any TMDL program.⁵

The Applicants intend to continue to implement the PIPP required under the current Los Angeles County MS4 permit. Additionally, permittees shall identify watershed pollutants of concern, including priority pollutants for inclusion into the PIPP. Because of financial limitations, the Applicants shall not be able to afford to pay for pollutant specific outreach audio and video advertisements. Instead, the permittees will continue to rely on the PIPP developed by the Principal Permittee, which is funded through the Los Angeles County Flood Control Assessment. The Applicants shall also utilize PIPP general, non-pollutant specific materials developed by the Principal Permittee.

⁵The current trash TMDL for the Los Angeles River and Ballona Creek does not sufficiently emphasize PIPP.

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Further, the Applicants shall develop brochures, leaflets, information cards, and other materials as necessary. As a means of reducing PIPP costs, the permittees shall utilize materials already developed by other MS4 programs, including but not limited to the County of Los Angeles, the City of Los Angeles, Orange County and other municipalities throughout the State. If necessary, the Applicants will also allocate resources to collectively develop materials aimed at identifying pollutants of concern on a watershed level and reducing their generation by targeting specific audiences/sources.

In more specific terms, the Applicants propose to implement the following PIPP program elements:

1. Residential Program

- The Applicants shall stencil or mark all of their catch basins with “no dumping” impressions and shall, on an annual basis, re-stencil or re-mark illegible impressions.
- The Applicants shall continue to post “no dumping” signage at public access points to creeks, channels or other conveyances that flow into receiving waters and ensure on an annual basis that such signage is still posted and is legible.

2. Countywide Hotline

- The Applicants shall continue to recognize the 888-CLEAN-LA hotline for reporting illicit connections, illicit discharges, and clogged catch basins.
- The Applicants may also, in the alternative, promote their own reporting hotline in lieu of or in addition to the County’s hotline for the purposes of reporting illicit connections, illicit discharges, and/or clogged catch basins.
- The Applicants that choose to operate their hotlines shall notify the Los Angeles County Principal Permittee and provide names of those individuals who shall be designated as reporting line contacts.

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3. Outreach and Education

- The Applicants shall continue to implement the applicable PIPP tasks that were developed during the first 5 year PIPP developed by the Los Angeles County Principal Permittee, which are more particularly described under the current Los Angeles County MS4 Permit.

4. Pollutant Specific Outreach

- The Applicants shall develop outreach materials in keeping with pollutants of concern, including those specified on the 303(d), for the Upper San Gabriel River Watershed. The Applicants shall use available materials to address pollutants of concern. For materials that are not available for a pollutant, permittees shall endeavor to create them. Every effort shall be made to minimize costs, including "borrowing" materials already developed by other jurisdictions.
- The Applicants recommend -- in keeping with what the Permittees intend to propose in the Unified Los Angeles County ROWD -- that the next Permit remove the requirement to ensure a minimum of 35 million impressions per year on the general public about stormwater quality via print, local TV access, local radio, or other appropriate media. The Applicants believe that a better way to quantify the effectiveness of a public information and participation program is to use a presumptive measurement approach. This presumptive measurement approach will quantify a percent reduction or improvement in water quality as a result of implementing an integrated and cost-effective public information and participation program.

4.17 Priority 15 – Public Agency Program Revision

The Applicants recommend that the Public Agency Program under the current Los Angeles County MS4 Permit be revised to the following extent: (1) change the name of the program to Municipal Agency Program; and (2) eliminate the 2.F.1, *Sewage System Maintenance, Overflow, and Spill Prevention* requirement.

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Referring to municipal operations as “public” is too general. Public can mean a state, federal or local agency. The term “municipal” is more specific and, as a matter of descriptive accuracy, is more preferable.

Section 2.F.1 should be eliminated from the next MS4 Permit because it has been effectively replaced by a more expansive sewer maintenance regulation that was adopted by the State Water Resources Control Board in May of 2006 (viz., *Statewide General Waste Discharge Requirements for Sewage Collection System Agencies*). This WDR, which is intended to reduce sewer system overflows, will require MS4 Permittees to implement tasks that exceed the Section 2.F.1 requirement. Notably, it will require a reporting program, an overflow emergency response program, a grease control program, an operations and maintenance program, a sewer system evaluation and capacity assurance plan, and a sewer system management plan that incorporates each of these elements.

4.18 Priority 16 – Permit Implementation Costs

The Applicants, as well as many other Permittees, have had to budget and divert earmarked money from other municipal requirements to meet the obligations under the current Los Angeles County MS4 Permit. The Applicants are concerned about the year-to-year increase in program implementation costs and do not foresee new revenue streams to help bridge the gap between MS4 Permit compliance and other municipal programs.

The Regional Board should not overlook the fact that the Applicants lack adequate resources to implement the requirements of the Permit, many of which are State unfunded mandates. Each Applicant operates under very a limited budget. While the cost of local government continues to rise, Cities continue to be constrained by taxing limitations make it difficult – if not almost impossible – to generate revenue necessary to keep with such costs. Proposition 218 effectively prohibits municipalities from adopting storm water fees without voter approval. Few municipalities have succeeded in adopting voter approved storm water fees since the current Los Angeles County MS4 Permit was adopted.

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Therefore, the Regional Board should give consideration to developing and implementing program requirements that target the largest and most frequent sources of stormwater pollution, and that utilize Permittee resources prudently so as not to exhaust them beyond reasonable means.

Applicants, together with other Permittees, also recommend that Annual GIASWP and GCASWP inspection fees collected by the State Water Resources Control Board, be distributed to Permittees for conducting industrial facility and construction inspections.

As another means of helping pay for MS4 Permit costs, the Applicants, ask that the State Board rebate a portion of the annual MS4 NPDES Permit fees to them for this purpose. The Applicants are sensitive to the fact that the State charges each of them several thousands of dollars a year in NPDES permit fees (including a surcharge) without fully understanding the purpose or benefit of such fees. The Applicants are also sensitive to the fact that the current Los Angeles County MS4 permit requires Permittees to conduct inspections of industrial facilities and construction sites that are subject to General NPDES Storm Water Permits but without compensation. This issue will be raised again during MS4 Permit discussions with the regional board.

Section 5.0 Water Quality Monitoring

5.1 Purpose

As stated in the current Los Angeles County MS4 Permit, the primary objectives of the Monitoring Program are:

- Assessing compliance with Permit requirements
- Measuring and improving the effectiveness of SQMP's
- Assessing the chemical and physical, and biological impacts of receiving waters resulting from urban runoff
- Characterization of storm water discharges Identifying sources of pollutants
- Identifying sources of pollutants
- Assessing the overall health and evaluating long-term trends in receiving water quality

Ultimately, the Monitoring Program is expected to produce data that should be used to adjust each Permittee's Storm Water Quality Management Plan (SQMP) to address pollution issues and, thereby, enhance and protect the beneficial uses of a receiving water.

5.2 Using the Principal Permittee's Monitoring Program

In the interest of economy, the Applicants propose to use the data generated from the Principal Permittee's current and future water quality monitoring program to achieve the aforementioned Monitoring Program objectives (incorporated by reference herein as **Appendix A**).

5.3 Watershed-Specific Monitoring and Data Acquisition

The Applicants intend to acquire as much data that has already been developed by other sources that are specific to the Upper San Gabriel River Watershed (reaches 2 and 3, Walnut Creek and the

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San Jose Creek) – especially the quality of runoff that enters the spreading grounds and other infiltration facilities. Such sources include but are not limited to the following:

- Los Angeles County Flood Control District
- San Gabriel Basin Water Quality Authority
- Main San Gabriel Basin Watermaster
- Upper San Gabriel Municipal Water District
- San Gabriel and Lower Los Angeles Rivers Mountains Conservancy
- Cities of Whittier, Glendora and Azusa, which are producers and suppliers of potable water in the San Gabriel Valley
- California Regional Water Quality Control Board, Los Angeles Region
- State Water Resources Control Board
- United States Environmental Protection Agency, Region IX

Any pertinent data garnered from these sources shall be added to the data obtained from the Principal Permittee to evaluate the extent of water quality impairment to reaches 2 and 3 of the San Gabriel River and tributaries.

The Applicants are aware that a metals total maximum daily load (TMDL) for the San Gabriel River is about to be adopted by the regional board. The Applicants have formed the hypothesis that the quality of urban runoff generated within their municipal jurisdictions does not impair the beneficial uses of any water body within the Upper San Gabriel River Watershed (viz., municipal water supply, ground water recharge, recreation 1, and recreation 2 uses). To demonstrate this, the Applicants may be required to conduct additional monitoring of metals (viz., copper, lead, and zinc).

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Further, the Applicants shall, if funding permits, search for data or acquire it, if necessary, through separate sampling and analyses to determine to what extent oil, grease, surfactants (nutrients), and other pollutants impair beneficial uses within Upper San Gabriel River Watershed water bodies. The aim here is determine if post-construction structural controls called for under the development planning program should be required for certain developments sited in certain watershed drainage areas.

5.4 Studies

The Applicants continue to look forward to using information developed from various studies conducted by the Principal Permittee (e.g., BMP effectiveness and Peak Discharge Impact). In addition, the Applicants realize that studies will be needed to demonstrate that the spreading grounds and other regional infiltration structures within the watershed operate to mitigate pollutants in runoff. The Applicants have already begun to work on initiating this task.

5.5 Funding

The Applicants will need to rely on outside sources of funding to pay for additional monitoring and studies that are watershed-specific. Grants are one potential source. As a watershed group, the Applicants intend to actively seek funding from a variety of available sources, including but not limited to the Integrated Regional Watershed Management Program (IRWMP), Consolidated Grants, USEPA water infra-structure grants, etc. The Applicants hope that they will qualify more easily for grant funds under the banner of a watershed group as opposed to being Permittees subordinate to the Los Angeles County MS4 Permit.

Appendix A Water Quality Monitoring Program

The 2001 Permit states that the results of the monitoring program should be used to “refine the SQMP for the reduction of pollutant loadings and the protection and enhancement of the beneficial uses of the receiving waters in Los Angeles County.” Techniques to quantify the relationship between SQMP implementation and water quality are still in their infancy, and will mature through an iterative process over many Permit cycles. The recommendations described in this ROWD have been made with this in mind. Resources are proposed to be shifted toward those studies and monitoring programs that allow for a better measure of SQMP effectiveness and lead to reduction in pollutant loading from urban and storm runoff. Table 1 compares key monitoring requirements under the 2001 Permit with Permittees’ recommendations in this ROWD.

In preparing this ROWD, Permittees have also taken into account the five core management questions set forth in the Stormwater Monitoring Coalition’s report entitled “Model Monitoring Program for Municipal Separate Storm Sewer Systems in Southern California”:

- Question 1: Are conditions in receiving waters protective, or likely to be protective, or beneficial uses?
- Question 2: What is the extent and magnitude of the current or potential receiving water problems?
- Question 3: What is the relative urban runoff contribution to the receiving water problems?
- Question 4: What are the sources to urban runoff that contribute to receiving water problems?
- Question 5: Are conditions in receiving waters getting better or worse?

Table 2 shows if and to what extent each of these questions is addressed by both the 2001 Permit and the Permittees’ recommendations. Finally, Table 3 contains a list of impaired water body special studies and monitoring programs for which the Permittees are responsible. Striving to obtain a streamlined and cost-effective monitoring program under the new Permit, Permittees recommend that these studies and programs be integrated with other monitoring requirements as much as possible.

5.1 CORE MONITORING

A. Mass Emissions Monitoring

Mass Emissions Monitoring is conducted in order to approximate the pollutant loads discharged by the MS4 system, to assess temporal trends at the Mass Emissions sites and to determine if flows from the MS4 system contribute to exceedances of Water Quality Standards.

1. Existing Permit Requirements:

- Monitor 7 Mass Emissions sites during the first storm, 2 additional storms and during 2 dry weather flows (3 storm flows and 2 dry weather flows).
- Monitor 6 Mass Emissions sites (automated sites only) for total suspended solids (TSS) during all storms with at least 0.25" of rain. Collected data to be used in conjunction with TSS correlation attempts.
- Samples at Mass Emissions sites may be taken with automatic samplers as under Order 96-054. Grab samples must be taken for pathogen indicators and oil and grease. Automated samplers should be set to monitor storms of at least 0.25".
- Samples at the Santa Clara River Mass Emissions site are taken manually due to the infeasibility of installing automated samplers. Flow weighted composites are to be collected during the first 3 hours of a storm, or for the duration if less than 3 hours. A minimum of 3 aliquots separated by a minimum of 15 minutes is collected within each hour of discharge.
- Annually an analysis of the correlation of TSS and other pollutants of concern is performed and reported.

2. Issues and Recommendations

- Wet weather data has been collected at most Mass Emissions Sites for approximately 10 years. Several constituents that consistently exceed water quality objectives exhibit no statistically significant trend as discussed in the Los Angeles County 1994-2005 Integrated Receiving Water Impacts Final Report, and it is unlikely that these constituents will be reduced to below water quality objectives in a short time frame. Using existing data, several data modeling exercises were performed to simulate different sampling strategies for wet weather data. It was concluded that collecting samples 2 times a year, or 3 times on alternate years, would be sufficient to determine trends over an approximately 40 year time period with a confidence of 95%. These modeling efforts and a more detailed discussion can be found in the Los Angeles County 1994-2005 Integrated Receiving Water Impacts Final Report. The Permittees recommend monitoring 2 storms and 2 dry weather events per year.
- Data collected during the period between 1994 and 2005 was analyzed for TSS correlation with other pollutants of concern and the results were reported in the Los Angeles County 1994-2005 Integrated Receiving Water Impacts Final Report. Statistically significant TSS correlations were found only in the Santa Clara watershed, a natural bottom river, for total chromium, lead, iron and arsenic as well as for dissolved copper and boron. No TSS correlations were found to be significant in the other watersheds.

- Permittees recommend that the sampling of storms exclusively for TSS be discontinued since few significant correlations were found in the previous 10 years. TSS Correlation was intended as a monitoring shortcut whereby TSS measurements could be used to approximate other pollutant loads while avoiding more expensive analyses. However, since few significant TSS correlations were found in the Santa Clara Watershed, and none in the other watersheds, TSS correlation cannot serve its intended purpose as a surrogate for more expensive analysis and should be discontinued.

B. Water Column Toxicity Monitoring

Water Column Toxicity Monitoring is performed in order to evaluate the toxicity of water being discharged from the MS4 system at the Mass Emissions Sites, to determine the causes and extent of toxicity in receiving waters and to modify and utilize the SQMP in order to eliminate or reduce sources of toxicity in MS4 discharges.

1. Existing Permit Requirements
 - Two storm events (including the first of the season) and two dry weather events are annually analyzed for toxicity. *Ceriodaphnia dubia* (water flea) 7-day survival/reproduction and *Strongylocentrotus purpuratus* (purple sea urchin) fertilization tests are used as a minimum.
 - A Phase I Toxicity Identification Evaluation (TIE) is performed on samples exhibiting a toxicity of 1 Toxic Unit or more for the water flea and a toxicity of 2 Toxic Unit or more for the purple sea urchin.
 - A Toxicity Reduction Evaluation is performed if a pollutant or class of pollutants is responsible for 50 percent of three or more TIEs at the same location.
2. Issues and Recommendations
 - Only 9.6% of all toxicity tests for *C. dubia* (water flea) resulted in TIEs and no trends were apparent. Furthermore, no dry weather toxicity tests for *C. dubia* (water flea) were toxic. Therefore, the Permittees recommend reducing the dry weather *C. dubia* (water flea) toxicity testing at the Mass Emissions sites to one test per year unless the first dry weather event *C. dubia* test of each year exhibits toxicity, in which case the second dry weather event should also be tested for *C. dubia* (water flea) toxicity.
 - Toxicity Testing should be performed at Tributary Monitoring sites for 2 storms and 2 dry events in order to detect pollutant effects that are not detected by physical or chemical analysis. The toxicity tests should be identical to those for the Mass Emissions Sites.

C. Shoreline Monitoring

The Shoreline Monitoring Program is intended to evaluate the impacts to coastal receiving waters and the loss of recreational beneficial uses resulting from storm water/urban runoff.

1. Existing Permit Requirements

- The City of Los Angeles is responsible for Shoreline Monitoring under 2001 Permit and the revised Santa Monica Bay Shoreline Monitoring Requirements approved June 14, 2005.
- Twenty shoreline water quality stations are monitored.
- Three additional sites are to be evaluated for future monitoring.
- Three indicator groups (Total coliforms, Fecal Coliforms and Enterococcus) are monitored using membrane filtration, multiple tube fermentation, or chromogenic substrate test kits.
- Sampling occurs weekly or 5 days a week depending upon historical water quality at the sampling sites.
- Sampling occurs during daylight hours and may be omitted during hazardous weather.
- Monitoring frequencies may be modified based on adjacent beach use and storm drain proximity as recommended by the Santa Monica Bay Restoration Commission's Technical Advisory Committee (SMBRC TAC) and the Los Angeles County Department of Health Services (LA County DHS).
- Data is transmitted daily to the LA County DHS.
- LA County DHS is responsible for taking appropriate action in accordance with State law when exceedances of bacterial water quality standards occur.

2. Issues and Recommendations

The Regional Board's 2005 revision to the shoreline-monitoring requirement only partially aligned the Permit's requirement with the Coordinated Shoreline Monitoring Program (CSMP) approved by the Regional Board on April 28, 2004. Some of the Permittees' concerns on this matter were presented in comment letters submitted to the Regional Board by the City of Redondo Beach and Los Angeles County Department of Public Works on April 27 and May 10, 2005, respectively.

The allowable number of exceedance days depends on monitoring frequency. In choosing to conduct weekly monitoring, responsible agencies agreed to a proportional reduction in the allowable number of exceedances from that for daily monitoring. While the rationale behind the SMBRC TAC's recommendation to base monitoring frequency on usage and historical water quality is understandable, Permittees believe that weekly monitoring, which is consistent with AB411, provides reasonable public health protection. Instead of more monitoring, scarce public funds should be directed toward identifying and eliminating anthropogenic sources contributing to shoreline water quality impairments.

Permittees recommend that the CSMP in its entirety replace the existing shoreline monitoring program under the 2001 Permit. Monitoring should be the

joint responsibility of those Permittees which are responsible agencies to address impaired water bodies. Permittees welcome the opportunity to discuss this issue with the SMBRC TAC.

D. Tributary Monitoring

Tributary Monitoring is performed in order to identify sub-watersheds where storm water discharges are causing or contributing to exceedances of Water Quality Standards, and to prioritize drainage and sub-drainage areas that need management actions.

1. Existing Permit Requirements
 - A minimum of six tributaries per year is monitored for a minimum of 1 year each. If no exceedances of water quality objectives are found at a station within one year, the station may be moved upon approval of the Regional Board Executive Officer. If exceedances for the same constituent are found in 3 out of 4 sampled events in a year, the Permittees shall initiate a focused effort to identify the sources of pollutants within that subwatershed.
 - Monitoring started in the Los Angeles River Watershed and is rotated between watersheds subject to the approval of the Regional Board Executive Officer. Descriptions and explanation of proposed sites and a summary of the previous year's data are to be included in the Annual Monitoring Report. The first tributaries to be monitored were prescribed in Order 01-182.
 - Tributary sites are monitored for the first storm of the year and three additional storms. At least one dry weather event per year is monitored at each site. (4 storm events and 1 dry weather event)
 - Tributary sites are monitored using the same sampling protocol as Mass Emissions sites and samples are analyzed for: pH, dissolved oxygen, temperature, conductivity, TSS, indicator bacteria, all priority pollutants, all constituents for which the water body is impaired downstream, and all constituents that caused toxicity or exceeded water quality criteria at the associated Mass Emissions Site the previous year. Flow data is also collected.

2. Issues and Recommendations
 - Tributary Monitoring sites should be located within a watershed for a period of two years. Watersheds should be rotated until all watersheds within the permit area have been monitored before returning to a previously monitored watershed. Watersheds are monitored for two years for two distinct reasons. First, two years allows for better calibration of monitoring equipment and adjusting sampling protocols to site specific factors (traffic patterns, equipment quirks, flow calibration). Secondly, and more importantly, two years of monitoring provides time so that subwatersheds with consistently high levels of pollutant loading can be identified, sources within subwatersheds can be identified and

the identified sources of pollutants can be properly addressed or eliminated.

- Tributary Monitoring sites will be located in the San Gabriel River Watershed, including the Coyote Creek Watershed, for the 06/07 monitoring year. Monitoring should continue in this watershed for a total of 2 years, and monitoring in the next watershed should begin during the 08/09 monitoring year. The Los Angeles River Watershed and Ballona Creek Watershed have each been previously monitored under the Tributary Monitoring program. The Santa Clara River, Malibu Creek, and Dominguez Channel watersheds should be monitored in the future.
- Dry weather flows occur for a larger portion of the year than storm flows and may be monitored at a much lower expense than storm flows. Dry weather flows may also provide insight into chronic conditions within the MS4 system that may be masked by the high volumes in a storm flow. Three wet weather sampling events are sufficient to detect and double check exceedances, in keeping with the purpose of Tributary Monitoring. Therefore, the Permittees recommend reducing wet weather sampling to 3 events and increasing the dry weather sampling to 2 events. Resources saved by reducing wet weather monitoring will be used to analyze tributary flows for toxicity.
- The Permittees propose the addition of toxicity testing to the tributary monitoring program so as to identify toxic pollutant classes that are not otherwise found using standard physical and chemical tests. The toxicity tests should be identical to those for the Mass Emissions Sites.

5.2 REGIONAL MONITORING

A. Estuary Sampling

The objective of the estuary-sampling requirement is to “sample estuaries for sediment chemistry, sediment toxicity, and benthic macroinvertebrate community to determine the spatial extent of sediment fate from storm water, and the magnitude of its effect.” This objective is consistent with questions 1, 2, and 5 of the Model Monitoring Program.

1. Existing Permit Requirements
The 2001 Permit requires the Principal Permittee to participate in the Bight '03 project, specifically with respect to the project's estuary sampling component. The permit language provides great detail on the extent of the participation; this has been summarized in Table 1.
2. Issues and Recommendation

Based on a preliminary review of available results, it appears that the Bight '03 project has been conducted such that the 2001 Permit's requirement has been fulfilled. We now better understand the extent and magnitude of impairments in LA County's estuaries. While some characterization work will remain necessary, we believe it is time to look more systematically at 1) determining the sources of urban runoff that contribute to elevated sediment toxicity levels and 2) how to reduce that contribution. The former question corresponds to question 4 in the MMP; the latter, while not a question formulated in the MMP, is essential for improving estuary sediment quality.

The Permittees recommend continuing participation in and fund future bight-wide studies (e.g. Bight '08). However, Permittees' contribution should be directed towards follow-up studies designed to answer questions most pertinent to reducing toxicant loading into LA County's estuaries from urban and storm runoff. These questions will be formulated in the coming months in consultation with Regional Board and SCCWRP, and may include but are not limited to the following:

- What are the specific toxicants causing recurring sediment toxicity in Ballona Creek Estuary? Dominguez Channel Estuary?
- What are sources of urban runoff that contribute to sediment toxicity?
- Partitioning coefficients between water column and sediment?
- Suspended sediment toxicity sampling protocol?
- Sediment transport mechanism and deposition patterns?
- What is the state of current technology available to reduce toxicant loading from urban and storm runoff?

B. Bioassessment

Existing Permit Requirements

- Participate in the SMC and with the Surface Water Ambient Monitoring Program (SWAMP) in development of a regional Index of Biological Integrity (IBI).
- Perform bioassessment monitoring every October
- Monitor a minimum of 20 sampling sites and coordinate with Surface Water Ambient Monitoring Program (SWAMP) in site selection.
- Collect a minimum of three replicate samples at each site
- Submit annual monitoring report containing all physical, chemical, and biological data collected and analyzed during bioassessment

1. Issues and Recommendations

- **Regional IBI:** Permittees will continue participation in the development and testing of a regional IBI for low graded and ephemeral streams and estuaries.
- **Site Selection:** Permittees will select the number and location of sampling sites through the protocol expected to be developed in the regional IBI. Permittees will consider those sites already sampled in the three years of the current permit for the sake of continuity.
- **Indicator Species:** Permittees will choose fresh and salt-water benthic species to indicate the health of low graded and ephemeral streams and estuaries from the regional IBI to be developed.
- **Impaired Water Body Studies:** Permittees will give consideration to how the bioassessment monitoring required by the MS4 permit can enhance impaired water body studies.

5.3 SPECIAL STUDIES

A. New Development Impact Study

1. Existing Permit Requirements

- With support from the City of Santa Clarita, determine impacts from new development in the Santa Clara River watershed
- Compare water quality between two subwatersheds, one with and one without post-construction SUSMP BMPs
- As agree, if in the event of not finding suitable subwatersheds for study, develop a water quality model to simulate results for a single watershed in the Santa Clara River watershed

2. Issues and Recommendations

- A watershed of multiple-land uses has been selected for the water quality model simulation, and monitoring instrumentation is being installed.
- The model will evaluate the effectiveness of SUSMP implementation by calculating the changes of runoff flows and contaminant loading due to certain BMPs installed. As a result, a matrix of most suitable BMPs for certain types of land use will be recommended.

- Upon the sampling of at least three storms, the model will be calibrated and run for various scenarios of BMP types and placement.
- Results will be used to support a study proposed by the SMC to evaluate the effectiveness of post-construction Low Impact Development (LID) BMPs in new development.
- Permittees will participate with the SMC LID study.

The proposed changes in the study requirements are summarized in Table 1 as compared with the requirements under the existing permit. The SMC's management questions for the New Development Impact Study are addressed in Table 2

3. Integration of impaired water body specific programs
 - Results of the SMC LID BMP study will be evaluated for their possible inclusion in impaired water body specific programs. The results of the study will provide a variety of options of structural BMPs to help implement impaired water body specific programs. Furthermore, the results of the study will help with impaired water body specific programs by minimizing the impact of any future development or redevelopment within the watershed.
4. Comparison of existing and proposed programs in addressing management questions by SMC

B. Peak Discharge Impact Study

1. Existing permit requirements
 - Evaluate peak flow controls
 - Determine numeric criteria to prevent or minimize erosion of natural stream channels and banks caused by upstream development.
2. Issues and Recommendations
 - A study, conducted jointly with the Stormwater Monitoring Coalition, was funded in whole by County Public Works and managed by the Southern California Coastal Waters Research Project.
 - The study was completed in a manner sufficient only to develop interim standards, which were promulgated and submitted to the Regional Board on January 31, 2005.
 - Interest in hydromodification issues among the permittees and members of the SMC led to a technical workshop in October 2005,

associated with the first annual conference of the California Stormwater Quality Association.

- Proceedings of the workshop were assembled and published by SCCWRP and USC Sea Grant in December 2005.
- Interest in peak discharge and hydromodification issues is still high among permittees and the SMC member agencies.
- Ongoing research is being discussed to take up where the County DPW-funded study left off.
- Permittees will continue participating with in-kind services and in a peer-review capacity in the SMC hydromodification impacts research and develop numeric criteria by Dec. 10, 2010, or 6 months after publication of the SMC research, whichever is later.
- Until that time, the Interim Peak Flow criteria will be enforced, applying to all areas draining directly or indirectly to natural streams.

The proposed changes in the study requirements are summarized in Table 1 as compared with the requirements under the existing permit.

3. Integration of impaired water body specific programs
4. Comparison of existing and proposed programs in addressing management questions by SMC

The SMC's management questions for the Peak Discharge Impact Study are addressed in Table 2.

C. BMP Effectiveness Study

1. Existing Permit Requirements
 - Conduct or participate in studies to evaluate the effectiveness of structural and treatment control BMPs.
 - Monitor the reduction of pollutants of concern in storm water for five or more different types of BMPs
 - Evaluate the requirements, feasibility and cost of maintenance for each BMP
 - Develop recommendations for appropriate BMPs for the reduction of pollutants of concern in storm water.
2. Issues and Recommendations
 - Five structural BMPs have been tested, including infiltration trench, catch basin inserts, enhanced manhole, hydrodynamic separator, wet vaults, and bioswale.

- Detailed results are provided in the Appendix H of Los Angeles County 1994-2005 Integrated Receiving Water Impacts Report, which was submitted to RWQCB in August 2005.
- Three of the tested BMPs warrant further evaluation, one will be evaluated by another agency, and one does not warrant further testing.
- At least two replacement BMPs will be included in the study. The BMPs will be from those structural BMPs incorporated in the permittees' Sun Valley Park Drain and Infiltration System Project.
- Because BMP evaluation for trash removal is already required under the Public Agency Activities Program, trash will not be one of the pollutants to be monitored.

The proposed changes in the study requirements are summarized in Table 1 as compared with the requirements under the existing permit.

D. Participation in Studies Organized by the SMC

County Public Works was a founding member of the Southern California SMC, and will continue to be an active member. Diligent efforts will be made to participate in ongoing or future studies organized by the SMC at various levels including peer review, in-kind services, and monetary contributions. In particular, DPW will participate in the following studies:

- Regional Index of Biological Indicators
- Laboratory Intercalibration
- Reference Watershed Study
- Low Impact Development BMP Evaluation, Guidance and Training
- Stormwater Toxicity Protocols
- Peak Flow/Hydromodification Study

5.4 INTEGRATION OF IMPAIRED WATER BODY SPECIFIC PROGRAMS

Alignment of Permit-mandated monitoring with those required under other actions of the Regional Board should be required. The shoreline-monitoring program is a good example. Impaired water body monitoring programs and special studies currently in progress, or are expected to be conducted during the 2006 Permit cycle, have been summarized in Table 3. All impaired water body projects should be conducted by those Permittees which are also responsible agencies for these impaired water bodies.

Appendix B Applicant Certification Letters

This appendix contains letters from the Cities, signed by their City Managers, to Mr. Jonathan Bishop, Executive Officer of the California Regional Water Quality Control Board, Los Angeles Region, certifying their participation in a separate a Report of Waste Discharge application, referred to as the Upper San Gabriel River Watershed Coalition.



The Canyon City — Gateway to the American Dream

June 12, 2006

Mr. Jonathan Bishop
Executive Officer
California Regional Water Quality Control Board
320 West 4th Street
Los Angeles, California 90013

Subject: Participation in Separate ROWD Application

Dear Mr. Bishop:

The City of Azusa writes to notify your office that it has decided to participate in a group watershed Report of Waste Discharge (ROWD), referred to as the Upper San Gabriel River Watershed Coalition (attached herewith).

The City, along with the other municipal applicants, is taking the initiative to promote and develop a more watershed-focused approach to urban runoff management. Each of the applicants shares the common characteristic of discharging partially or wholly upstream of percolation basins - including the Whittier Narrows Spreading Grounds and the Rio Hondo Spreading Grounds.

In the end, the City believes that this watershed approach, which is spelled out in greater detail in the attached ROWD, will "preserve and enhance" the beneficial use of the Upper San Gabriel River. The City believes that a watershed approach to runoff pollution control is in keeping with USEPA, State Water Resources Control Board, and Los Angeles Regional Water Quality Control policy. Beyond this, non-governmental agencies, Heal the Bay especially, have encouraged municipal NPDES Permittees to pursue a watershed management approach to runoff pollution control.

The City also believes that the approach will serve as a model for other watersheds. Although not all municipal permittees in the Upper San Gabriel River (differentiated from the lower half by the spreading grounds) are included in this application, we believe that the nucleus of Cities that form this watershed will, through the success of this approach, encourage other municipalities participate at a later date. Further, we see no reason why these Cities and the Los Angeles County Flood Control District could not participate with us shortly after the next MS4 Permits are adopted.

The City looks forward to your support of this the initiative, of which it is pleased to be a participant. Should you have any questions, please call James Makshanoff, Public Works Director at 626-812-5248.

Sincerely,

A handwritten signature in black ink, appearing to read 'Francis M. Delach', written in a cursive style.

Francis M. Delach
City Manager


CITY OF CLAREMONT
Jeffrey C. Parker, City Manager

City Hall
 207 Harvard Avenue
 P.O. Box 880
 Claremont, CA 91711-0880
 FAX (909) 399-5492
 www.ci.claremont.ca.us

City Manager • (909) 399-5441
 City Clerk • (909) 399-5460
 Personnel • (909) 399-5450
 Community Information • (909) 399-5497

June 12, 2006

Jonathan Bishop, Executive Officer
 California Regional Water Quality Control Board
 Los Angeles Region
 320 West 4th Street
 Los Angeles, CA 90013

Dear Mr. Bishop:

Participation in Separate ROWD Application

This letter is to notify your office that the City of Claremont has decided to participate in a group watershed Report of Waste Discharge (ROWD), referred to as the Upper San Gabriel River Watershed Coalition (attached herewith).

The City, along with the other municipal applicants, is taking the initiative to promote and develop a more watershed-focused approach to urban runoff management. Each of the applicants shares the common characteristic of discharging partially or wholly upstream of percolation basins – including the Whittier Narrows Spreading Grounds and the Rio Hondo Spreading Grounds.

In the end, the City believes that this watershed approach, which is spelled out in greater detail in the ROWD, will preserve and enhance the beneficial use of the Upper San Gabriel River. The City believes that a watershed approach to runoff pollution control is in keeping with USEPA, State Water Resources Control Board, and Los Angeles Regional Water Quality Control policy. Beyond this, non-governmental agencies, Heal the Bay especially, have encouraged municipal NPDES Permittees to pursue a watershed management approach to runoff pollution control.

The City also believes that the approach will serve as a model for other watersheds. Although not all municipal permittees in the Upper San Gabriel River (differentiated from the lower half by the spreading grounds) are included in this application, we believe that the nucleus of cities that form this watershed will, through the success of this approach, encourage the participation of other municipalities at a later date. Further, we see no


Jonathan Bishop
June 12, 2006
Page 2

reason why these Cities -- and the Los Angeles County Flood Control District for that matter -- could not participate with us shortly after the next MS4 Permits are adopted.

The City looks forward to your support of this initiative, of which it is pleased to be a participant.

Should you have any questions, please call our city engineer, Craig Bradshaw, at (909) 399-5465.

Sincerely,



Jeffrey C. Parker
City Manager

Attachment

- c: City Council
- Sonia Carvalho, City Attorney
- Tony Ramos, Assistant City Manager
- Anthony Witt, Community Development Director
- Scott Carroll, Community Services Director
- Craig Bradshaw, City Engineer



CITY OF GLENDORA CITY HALL

(626) 914-8201

OFFICE OF THE CITY MANAGER

116 East Foothill Blvd., Glendora, California 91741

FAX (626) 914-8221

city_manager@ci.glendora.ca.us

June 7, 2006

Mr. Jonathan Bishop
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street
Los Angeles, California 90013

Re: Participation in Separate ROWD Application

Dear Mr. Bishop:

The City of Glendora hereby gives notice, subject to concurrence of the Glendora City Council, that it has decided to participate in a group watershed Report of Waste Discharge (ROWD), referred to as the Upper San Gabriel River Watershed Coalition. The City Council is expected to authorize staff to file the appropriate application(s) as discussed below prior to the June 12 deadline for submission.

The City, along with the other applicants, is taking the initiative to promote and develop a more watershed-focused approach to urban runoff management. Each of the applicants shares the common characteristic of discharging partially or wholly upstream of percolation basins.

In the end, the City believes that this watershed approach, which is spelled out in greater detail in the ROWD, will preserve and enhance the beneficial use of this reach of the San Gabriel River. The City also believes that the approach will serve as a model for other watersheds.

Although not all municipal permittees in Reach 2 of the San Gabriel River are included in this application, we believe that the nucleus of Cities that form this watershed will, through the success of this approach, encourage other cities participate at a later date. Further, we see no reason why these cities could not participate with us shortly after the next MS4 Permits are adopted.

The City looks forward to your support of this the initiative, in which it is pleased to be a participant.

Should you have any questions, please call me.

Sincerely,

Eric G. Ziegler
City Manager

cc: City Council



June 6, 2006

Mr. Jonathan Bishop, Executive Officer
California Regional Water Quality Control Board, Los Angeles Region
320 West 4th Street
Los Angeles, California 90013

Subject: Participation in Separate ROWD Application

Dear Mr. Bishop:

The City of Irwindale writes to notify your office that it has decided to participate in a group watershed Report of Waste Discharge (ROWD), referred to as the Upper San Gabriel River Watershed Coalition (attached herewith).

The City, along with the other applicants, is taking the initiative to promote and develop a more watershed-focused approach to urban runoff management. Each of the applicants shares the common characteristic of discharging, partially or wholly, upstream of percolation basins.

In the end, the City believes that this watershed approach, which is spelled out in greater detail in the ROWD, will preserve and enhance the beneficial use of this reach of the San Gabriel River. The City also believes that the approach will serve as a model for other watersheds. Although not all municipal permittees in reach 2 of the San Gabriel River are included in this application, we believe that the nucleus of Cities that form this watershed will, through the success of this approach, encourage other Cities to participate at a later date. Further, we see no reason why these Cities could not participate with us shortly after the next MS4 Permits are adopted.

The City looks forward to your support of this initiative, of which it is pleased to be a participant.

Should you have any questions, please call me at (626) 430-2217.

Sincerely,

Robert Griego
Interim City Manager





City of Whittier

13230 Penn Street, Whittier, California 90602-1772
(562) 945-8200

Cathy Warner
Mayor

Owen Newcomer
Mayor Pro Tem

Joe Vinatieri
Council Member

Bob Henderson
Council Member

Greg Nordbak
Council Member

Stephen W. Helvey
City Manager

June 8, 2006

Mr. Jonathan Bishop, Executive Officer
California Regional Water Quality Board
Los Angeles Region
320 West 4th Street
Los Angeles, CA 90013

Dear Mr. Bishop:

RE: Participation in Separate ROWD Application

The City of Whittier writes to notify your office that it has decided to participate in a group watershed Report of Waste Discharge (ROWD), referred to as the Upper San Gabriel River Watershed Coalition (attached herewith).

The City, along with the other applicants, is taking the initiative to promote and develop a more watershed-focused approach to urban runoff management. Each of the applicants shares the common characteristic of discharging partially or wholly upstream of percolation basins.

In the end, the City believes that this watershed approach, which is spelled out in greater detail in the ROWD, will preserve and enhance the beneficial use of this Reach of the San Gabriel River. The City also believes that the approach will serve as a model for other watersheds. Although not all municipal permittees in Reaches 2 & 3 of the San Gabriel River are included in this application, we believe that the nucleus of Cities that form this watershed will, through the success of this approach, encourage other Cities to participate at a later date. Further, we see no reason why these Cities could not participate with us shortly after the next MS4 Permits are adopted.

The City looks forward to your support for this initiative, of which it is pleased to be a participant. Should you have any questions, please contact Dave Mochizuki, Director of Public Works, at (562) 464-3510.

Sincerely,


Stephen W. Helvey
City Manager

SH:ck

Attachment: Report of Waste Discharge

O:\Staff\Leon Yehuda\Separate ROWD App. 8.06.doc



California Regional Water Quality Control Board

Los Angeles Region

RB-AR237



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

July 12, 2006

Ms. Frances M. Delach, City Manager
City of Azusa
213 E. Foothill Blvd.
Azusa, California 91702

Mr. Jeffrey C. Parker, City Manager
City of Claremont
207 Harvard Avenue
Claremont, CA 91711

Mr. Eric G. Ziegler, City Manager
City of Glendora
116 East Foothill Blvd
Glendora, CA 91741

Mr. Robert Griego, Interim City Manager
City of Irwindale
5050 North Irwindale Avenue
Irwindale, CA 91706

Mr. Stephen W. Helvey, City Manager
City of Whittier
13230 Penn Steet
Whittier, CA 90602

REVIEW OF THE FIVE CITIES' SAN GABRIEL RIVER REPORT OF WASTE DISCHARGE IN LIEU OF THE REISSUANCE OF THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM WATER DISCHARGE PERMIT FOR THE COUNTY OF LOS ANGELES AND PERMITTEES (NPDES No. CAS004001, ORDER No. 01-182)

Dear Ms. Delach and Messrs. Parker; Ziegler; Griego; and Helvey:

We have received the Report of Waste Discharge (ROWD) submitted on June 12, 2006 for a 5 Cities San Gabriel River Municipal Separate Storm Sewer System Permit (SGR MS4 Permit). Municipal storm water discharges from the Cities of Azusa, Claremont, Glendora, Irwindale, and Whittier, (hereinafter referred to as "5 Cities") are presently regulated under Regional Board Order No. 01-182, which expires on December 12, 2006.

The 5 Cities, by submitting a separate ROWD are pursuing a separate MS4 permit and will assume among other things, the responsibility for their city specific storm water management program and monitoring program.

Our review of the ROWD indicates that while the 5 Cities are proposing some positive changes, other areas of the ROWD do not satisfy federal storm water regulations contained in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (61 Fed Reg. 41697). Some of the inadequacies include but are not limited to the following:

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Ms. Delach and Messrs. Parker;
Ziegler; Griego; and Helvey
Cities of Azusa, Claremont,
Glendora, Irwindale, and Whittier

- 2 -

July 12, 2006

1. Eliminating inspections programs for commercial facilities;
2. Eliminating the Development Planning Program including SUSMP and peak flow controls;
3. Eliminating Local SWPPPs for all construction sites 1 acre and greater; and
4. The Monitoring Program only includes using other Permittees' data but provides no monitoring for 5 Cities.

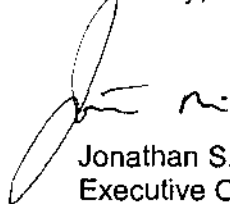
Federal Regulations (40 C.F.R. § 122.44(d)(1)(vii)(B)) require that NPDES Permits incorporate all applicable TMDL WLAs when reissued and are made enforceable. There is no existing authority to use MOUs for compliance within the NPDES regulatory scheme. Further, any dry weather WLAs are unaffected by storm water policy.

The ROWD did not satisfy the requirements in the United States Environmental Protection Agency (USEPA) Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems; Final Rule August 9, 1996 (*61 Fed Reg. 41697*). For these and other deficiencies in the ROWD, we deem it incomplete.

We do however, look forward to working out these details with your staff during the MS4 permit reapplication process. Our review will not be deemed to prejudice the Board from raising additional subject matter not identified herein, during the permit reissuance process. We intend to conduct a series of work-group meetings to receive input over the coming months with Permittee representatives and interested persons, to assist us in developing permit requirements. Pursuant to 40 CFR 122.6, Order 01-182 shall remain in effect and enforceable until a replacement LA MS4 Permit (with the 5 Cities as Permittees) or a 5 Cities MS4 Permit is adopted by the Board.

If you have any questions, please do not hesitate to contact me at (213) 576-6605 or Dr. Xavier Swamikannu at (213) 620-2094 or Carlos Urrunaga at (213) 620-2083.

Sincerely,



Jonathan S. Bishop
Executive Officer

cc: Mr. Michael Levy Esq, Office of the Chief Counsel, State Water Resources Control Board
Mr. Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board
Mr. Eugene Bromley, CWA Standards and Permits, USEPA Region IX
Mr. Dan Lafferty, Watershed Mgmt. Division, Los Angeles County Dept. of Public Works

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

GAIL FARBER, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

November 24, 2010

Mr. Samuel Unger, PE
Executive Officer
California Regional Water Quality
Control Board – Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013-2343

Dear Mr. Unger:

SUBMISSION OF A REPORT OF WASTE DISCHARGE FOR THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT MUNICIPAL SEPARATE STORM SEWER SYSTEM

The enclosed Report of Waste Discharge (ROWD) and proposed Stormwater Quality Management Program (SQMP) are being submitted by the Los Angeles County Flood Control District (LACFCD). This serves as the LACFCD's application to renew the existing 2001 Los Angeles County National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit (NPDES No. CAS004001) and waste discharge requirements adopted by Order No. 01-182 (2001 permit) by your Board. This ROWD and SQMP have been prepared in accordance with the requirements in Part 6, Section S, of the 2001 permit.

The LACFCD has elected to pursue an individual NPDES permit and waste discharge requirements separate from the copermittees included in the 2001 permit.

By filing this application, the LACFCD hereby withdraws from its participation in the ROWD dated June 12, 2006, submitted in conjunction with the County and 78 other copermittees.

IN REPLY PLEASE

REFER TO FILE: WM-9

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CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Mr. Samuel Unger
November 24, 2010
Page 2

If you have any questions, please contact me at (626) 458-4300 or ghildeb@dpw.lacounty.gov or your staff may contact Ms. Rossana D'Antonio at (626) 458-4325 or rdanton@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



GARY HILDEBRAND
Assistant Deputy Director
Watershed Management Division

ACL:cp

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Enc.

cc: State Water Resources Control Board
United States Environmental Protection Agency, Region 9

Report of Waste Discharge
Los Angeles County Flood Control District
Municipal Separate Storm Sewer System

November 24, 2010

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Report of Waste Discharge for the LACFCD MS4

Report of Waste Discharge

Los Angeles County Flood Control District

Municipal Separate Storm Sewer System

EXECUTIVE SUMMARY

This Report of Waste Discharge (ROWD) and proposed Stormwater Quality Management Program (SQMP) are being submitted by the Los Angeles County Flood Control District (LACFCD) as its application for renewal of the existing 2001 Los Angeles County National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit (NPDES Permit No. CAS004001) and waste discharge requirements adopted by Order No. 01-182 (2001 Permit) by the Regional Water Quality Control Board, Los Angeles Region (Regional Board). This ROWD and SQMP have been prepared in accordance with the requirements in Part 6, Section S, of the 2001 Permit.

The LACFCD has elected to pursue an individual NPDES permit and waste discharge requirements for its activities, separate from the co-permittees in the 2001 Permit (the 84 incorporated cities and the County of Los Angeles).

By filing this application, the LACFCD hereby withdraws from its participation in the ROWD dated June 12, 2006.

The LACFCD boundaries encompass more than 3,000 square miles, 85 cities, unincorporated areas, and approximately 2.1 million land parcels. The LACFCD owns¹ drainage infrastructure within incorporated and unincorporated areas in every watershed in the Los Angeles Region, including open channels, underground storm drains, catch basins, and pump stations. The LACFCD also owns the County of Los Angeles Department of Public Works headquarters building and LACFCD maintenance yards to support its field operations.

Urban and stormwater runoff flows into receiving waters of the Los Angeles Region, either directly or through one or more watercourses, drains, channels, or other drainage infrastructure. Such infrastructure or watercourses may be owned by the LACFCD or by another public entity such as a city, county, state or federal government, a private party, or a combination of these.

The SQMP developed under the 2001 Permit contains many activities and programs (that are not applicable to the LACFCD due to the nature of its operations and its lack of land use authority).

The proposed SQMP identified in this ROWD addresses the facilities and operations of the LACFCD. **Table E-1** provides a summary of the SQMP practices for the activities undertaken by the LACFCD. Stormwater program elements that are not applicable to LACFCD facilities and operations and are the responsibility of another agency, such as the industrial and commercial facilities control program are not included in this ROWD.

¹ The LACFCD owns or maintains easements for drainage facilities and access.

Implementation of the SQMP for the LACFCD is managed by the Watershed Management Division of Public Works and is supported by several other divisions within Public Works.

Under the 2001 Permit, the LACFCD performs certain monitoring and submits an annual monitoring report as described in the Monitoring and Reporting Program CI 6948. The monitoring performed by the LACFCD monitors the quality of the water that is collectively in the Municipal Separate Storm Sewer System (MS4).

The monitoring program identified in this ROWD includes continuation of Mass Emission and Water Column Toxicity monitoring. The LACFCD proposes to continue supporting, as a stakeholder, the Estuary Sampling and Bioassessment regional monitoring efforts.

Included in this ROWD are a series of recommendations relative to the SQMP and the Monitoring Program. These recommendations are an outgrowth of the knowledge gained during the implementation of the 2001 Permit. Finally, this ROWD proposes an annual reporting format and, if required by the Permit, the establishment of a program effectiveness assessment consistent with the guidance development by the California Stormwater Quality Association (CASQA).

Table E-1. Summary of Stormwater Control Measures for LACFCD Facilities

Flood Protection Facilities	Operations and Maintenance Facilities
<ul style="list-style-type: none"> • Planning and Design <ul style="list-style-type: none"> ○ Flood Control Facility Design ○ Training • Construction <ul style="list-style-type: none"> ○ BMP Implementation ○ Inspections and Enforcement ○ Training • Operation and Maintenance <ul style="list-style-type: none"> ○ BMP Implementation ○ Outreach ○ Illicit Connections and Illicit Discharges ○ Training 	<ul style="list-style-type: none"> • Headquarters Building and Maintenance Yards <ul style="list-style-type: none"> ○ Parking Lot Runoff ○ Landscape Management ○ Yard SWPPPs ○ Spill Response ○ Fueling ○ Wash Rack ○ Training

1.0 INTRODUCTION

1.1 Overall Description and Responsibilities of the Applicant

The Los Angeles County Flood Control Act was adopted by the State Legislature in 1915, after a disastrous regional flood took a heavy toll on lives and property. The Act established the Los Angeles County Flood Control District (LACFCD) and empowered it to provide flood protection, water conservation, recreation and aesthetic enhancement within its boundaries. The LACFCD is governed, as a separate legal entity, by the County of Los Angeles Board of Supervisors.

Since 1985, the activities of the LACFCD have been performed by the employees of the County of Los Angeles Department of Public Works. The Watershed Management Division of Public Works acts as the planning and policy arm of the LACFCD. The Flood Maintenance and Water Resources Divisions of Public Works oversee the maintenance and operational efforts, respectively, of the LACFCD.

The LACFCD boundaries encompass more than 3,000 square miles, 85 cities, unincorporated areas, and approximately 2.1 million land parcels. The LACFCD owns drainage infrastructure within incorporated and unincorporated areas in every watershed of the Los Angeles region, including approximately 500 miles of open channels, 2,900 miles of underground storm drains, and over 80,000 catch basins. A map of the LACFCD and the watershed management areas are shown in **Figure 1-1**. Some of the watersheds extend beyond the boundaries of the LACFCD and of the 2001 Permit.

Urban and stormwater runoff flows into receiving waters of the Los Angeles Region, either directly or through one or more watercourses, drains, channels, or other drainage infrastructure. Such infrastructure or watercourses may be owned by the LACFCD or by another public entity such as a city, county, state or federal government, a private party, or a combination of these.

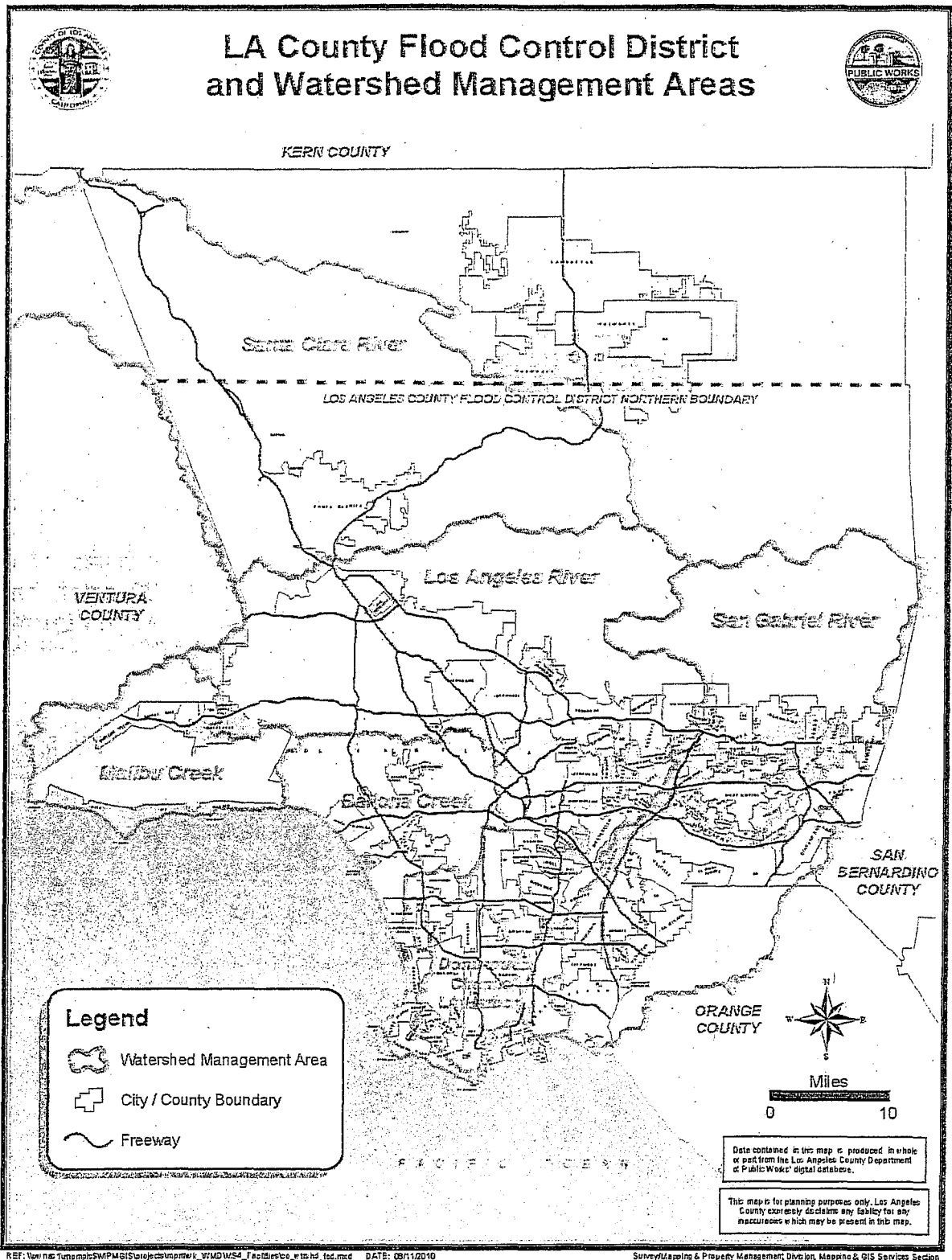


Figure 1-1. Overview of the LACFCD and Watershed Management Areas

1.2 Objective

In accordance with the requirements in Part 6, Section S, of the 2001 Permit, this Report of Waste Discharge (ROWD) and proposed Stormwater Quality Management Program (SQMP) constitute the LACFCD's application for renewal of the 2001 Permit.

In addition to the report and recommendations contained herein, the LACFCD reserves its right to object to those terms of the National Pollutant Discharge Elimination System (NPDES) Permit or modifications to those terms of the Permit, which are not addressed in this ROWD. This ROWD, and the contents herein, do not constitute a waiver of the LACFCD's right to challenge objectionable terms contained in previous, current, or future Permits, and no contrary inference should be drawn. The LACFCD further reserves its right to further revise, modify, and/or challenge any item addressed in this ROWD.

1.3 Applicant Information

As authorized by 40 CFR Section 122.26(d), the LACFCD has elected to pursue an individual Municipal Separate Storm Sewer System (MS4) NPDES permit and waste discharge requirements for its activities separate from the co-permittees of the 2001 Permit (the 84 incorporated cities and the County of Los Angeles).

This ROWD is submitted as an application solely for the LACFCD. By this application, the LACFCD is withdrawing from its participation in the ROWD dated June 12, 2006, which will consist of the remaining applicants, namely, 78 cities and the County of Los Angeles (representing the unincorporated areas covered by the 2001 Permit).

Contact information for the LACFCD is listed below. Correspondence relative to this permit renewal application should be submitted to:

Gail Farber
Chief Engineer, LACFCD
Attention: Gary Hildebrand, Assistant Deputy Director
County of Los Angeles Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803
626-458-4300

1.4 LACFCD Stormwater Quality Management Program Element Transition

With this ROWD, and proposed SQMP, the LACFCD is will transitioning from its role as the Principal Permittee for the stormwater management program under the 2001 Permit to an individual permittee implementing its own SQMP and participating in regional efforts where appropriate. **Table 1-1** summarizes those activities currently performed by the LACFCD under the 2001 Permit that will not be continued and its proposed activities under a new individual NPDES Permit and waste discharge requirements.

Table 1-1. Summary of Current and Proposed LACFCD Permit Activities

Program Elements	Summary of Significant Activities Performed by LACFCD under the 2001 Permit that will not be Continued	Proposed LACFCD Activities
Stormwater Quality Management Program Implementation	Principal Permittee responsibilities as discussed in Part 3, Section D Unified annual report preparation and submission Coordinated and led efforts or compiled results of several SQMP program elements	Implement LACFCD SQMP Prepare and submit LACFCD annual report Participate in (but not lead) regional initiatives Described in Section 4.1
Public Information and Participation (PIPP)	Coordinated catch basin labeling Maintained reporting hotline Managed and provided the majority of the funding for region-wide outreach and education Led pollutant-specific outreach	Outreach and other activities in the Flood Protection Facilities Program as described in Section 4.2.3 Participate in hotline as described in Section 4.2.3
Industrial/Commercial Facilities Control		Not applicable because LACFCD does not regulate these facilities
Development Planning		Not applicable for private development because LACFCD does not regulate private development LACFCD will implement a planning and design element for its own public projects Described in Section 4.2.1
Development Construction		Not applicable for private construction because LACFCD does not regulate private construction LACFCD will implement a construction element for its own public projects Described in Section 4.2.2

Program Elements	Summary of Significant Activities Performed by LACFCD under the 2001 Permit that will not be Continued	Proposed LACFCD Activities
Public Agency Activities		Proposed SQMP is focused on Public Agency Activities Described in Sections 4.2 and 4.3
Illicit Connections/Illicit Discharges Elimination (IC/ID)	Tracking and trending of region-wide IC/IDs and preparing of the annual trending report Maintenance of hotline	IC/ID efforts will be continued to identify illicit discharges and connections into flood control facilities Participate in hotline as described in Section 4.2.3
Monitoring Program		Continue to perform mass emission and water column toxicity monitoring and where appropriate participate and contribute to regional monitoring programs Described in Section 5.0

2.0 ACCOMPLISHMENT HIGHLIGHTS OF THE LACFCD UNDER THE 2001 PERMIT

2.1 Public Information and Participation (PIPP)

The primary strength of LACFCD's PIPP is the expertise of its staff to provide and coordinate information and technical assistance to stakeholders and program assessment tools. The independent research analysis conducted by Field Research Corporation on LACFCD's Countywide Stormwater/Urban Runoff Program concluded that there have been positive changes over time in some of the littering/polluting behaviors targeted by the campaign and that the campaign is effective.

Specific accomplishments of the PIPP include:

- The PIPP campaign messages reached the targeted audiences with increases in awareness and use of used motor oil certified collection centers in the Hispanic and Chinese communities. Survey results shown 1 to 5 percent decrease in self-reported behaviors concerning polluting activities (e.g. littering, dumping into storm drains) in comparison to the 1997 baseline survey results.
- As a result of the LACFCD's Environmental Defenders student assemblies, the number of students recycling plastic, aluminum, newspapers, and paper increased by more than 10 percent (self-reported numbers). Also, 59 percent of students reported they did more to protect the environment after attending the assembly presentation.

- Performed public outreach through various methods including paid media buys, homeowner associations, corporate outreach program, posters, litter bags, television, radio public service announcements, newsletters, and workshops.
- Supported Heal the Bay in its coordination of California Coastal Cleanup Day.
- Public Works received the second place award in the Improving Water Quality category for the FY 2007-2008 Countywide Stormwater Public Education Campaign recognized by the National Association of Flood & Stormwater Management Agencies at their annual conference held in August 2008.

2.2 Public Agency Activities

The Public Agency Activities program element has led to increased staff awareness and decreased potential for pollutant runoff from public facilities.

Specific accomplishments of this program element include:

- Continued voluntary auditing of all LACFCD field yards for stormwater Best Management Practice (BMP) implementation
- Implemented pollution prevention plans at Flood Maintenance Facilities
- Continued cleaning of all Priority A, B and C catch basins and maintaining catch basin stenciling
- Continued inspection of open channels and removing trash and debris annually before the start of the storm season

2.3 Illicit Connections/Illicit Discharges Elimination (IC/ID)

The LACFCD's IC/ID Elimination program has led to improved interagency coordination, prompt response to reported illicit discharges, increased public and city staff awareness, and increased public reporting. All known illicit connections and illicit discharges are eliminated in a timely manner. The total number of illicit discharges and illicit connections reported or indentified during the period of 2001 through 2009, and the fate of the discharge or connection are summarized in **Tables 2-1** and **2-2**.

Table 2-1. Summary of Illicit Connections (2001-2009)

Reported or identified	Investigated	Conveyed exempt discharges or NPDES permitted	Conveyed illicit discharges and terminated	Removed	Enforcement action taken	Other action taken
7756	6814	3025	310	346	150	440

Table 2-2. Summary of Illicit Discharges (2001-2009)

Reported	Discontinued/ cleaned up (source identified)	Cleaned up (source not identified)	No evidence of discharge	Determined to be conditionally exempt	Exempt or in compliance (source identified)	Enforcement action taken
2967	1085	983	215	11	11	40

2.4 Monitoring and Reporting

The LACFCD continued to conduct receiving water quality monitoring during both the dry- and wet-season. Mass emissions monitoring, including visual inspections and photo-documentation for the presence of trash, was conducted in each of the major watersheds at seven total locations. A rotating tributary monitoring program was implemented in five watersheds – Ballona Creek, Los Angeles River, San Gabriel River, Malibu Creek, and currently Dominguez Channel. The mass emissions monitoring program encompassed water column toxicity testing in accordance with the 2001 Permit.

The LACFCD also participated in the 2003 and 2008 Bight-wide studies led by the Southern California Coastal Water Research Project (SCCWRP). Further, annual bioassessment was conducted at about 20 locations throughout the County in coordination with the Stormwater Monitoring Coalition (SMC) and the State's Surface Water Ambient Monitoring Program (SWAMP). Results of these monitoring programs were submitted previously to the Regional Board as part of the Annual Monitoring Reports on or around August 15 of each year. The *Los Angeles County 1994-2005 Integrated Receiving Water Impacts Report – Final Report* (Integrated Receiving Water Impacts Report) was submitted in August 2005. Additionally, the LACFCD also completed several special studies under the 2001 Permit, namely:

- New Development Impact Study - to assess the impact of new development on stormwater quality in the Santa Clara River watershed
- Peak Discharge Impact Study - to establish guidance for peak flow management criteria to help prevent or minimize stream channel erosion
- BMP Effectiveness Study – to evaluate the relative pollutant removal effectiveness of structural BMPs

The results of these studies also were submitted previously to the Regional Board.

3.0 DESCRIPTIONS OF FACILITIES TO BE COVERED BY PERMIT

3.1 Flood Protection Facilities

3.1.1 Stormwater Conveyance System

The LACFCD owns portions of the drainage infrastructure within incorporated and unincorporated areas in every watershed of the Los Angeles Region, including approximately 500 miles of open channels, 2,900 miles of underground storm drains,

and over 80,000 catch basins. The entire separate storm sewer system owned by the LACFCD is shown in **Figure 3-1**.

As noted above, the conveyance system includes over 80,000 catch basins. A catch basin (a.k.a., storm drain inlet, curb inlet) is an inlet to the conveyance system that typically includes a grate or curb inlet where stormwater enters. Many of the LACFCD catch basins have been retrofitted by other agencies (i.e., Los Angeles area cities and the County) with connecting pipe screens and/or with automatic retracting screens to exclude trash from the MS4. Agency responsibility for maintenance of catch basins varies and is governed by individual agreements with the municipalities and County.

The LACFCD's infrastructure received flows from various sources. These include storm sewer systems owned by cities and other public agencies that connect to the LACFCD's infrastructure, NPDES-permitted discharges (including wastewater treatment plants, potable water, and other NPDES-permitted sources), federal and state properties, EPA-authorized discharges (including discharges related to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and other remedial activities), groundwater and natural flows, direct precipitation, and sheet flow.

3.1.2 Pump Stations

Pump stations are used to pump stormwater to higher elevation for conveyance. The LACFCD owns 52 pump stations.

3.2 Operations and Maintenance Facilities

3.2.1 Headquarters Building

The LACFCD owns its headquarters building located at 900 South Fremont Avenue in the City of Alhambra, CA. The facility includes a fueling station and a wash rack that discharges to the sanitary sewer. The wash rack is used to wash Public Works vehicles.

3.2.2 Maintenance Yards

The LACFCD operates 12 flood maintenance yards. Materials and equipment associated with maintaining the flood control facilities are stored at the yards. Maintenance yards typically have an office with staff.

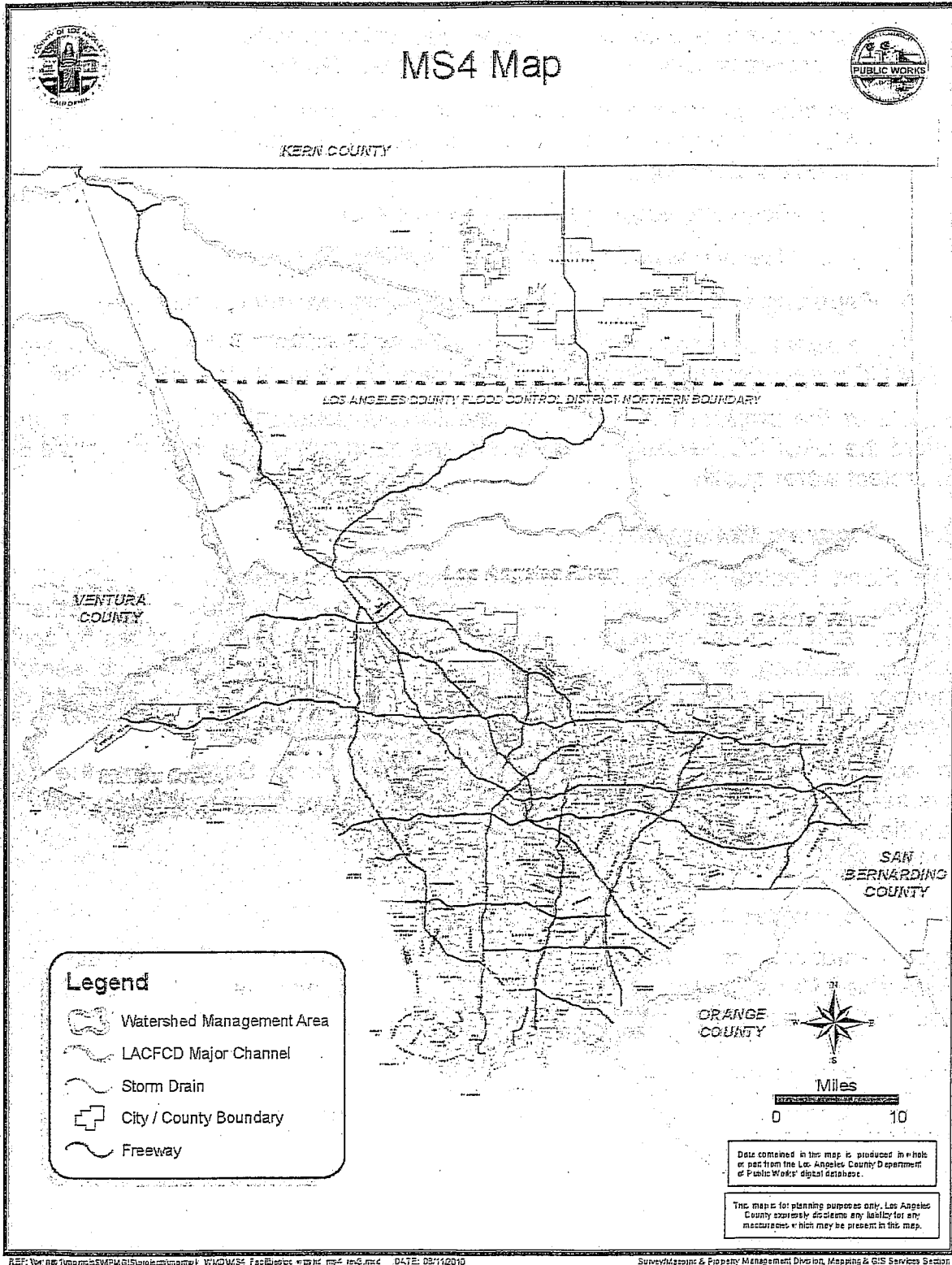


Figure 3-1. Layout of the MS4s owned by LACFCD

4.0 PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM

The LACFCD's proposed SQMP includes:

- A discussion of program management, which identifies how LACFCD manages the implementation of the program elements (Section 4.1);
- Two major program elements based on the types of LACFCD facilities, for which LACFCD implements practices, processes, and controls to protect, manage, and improve water quality:
 - Flood Protection Facilities (Section 4.2)
 - Operations and Maintenance Facilities (Section 4.3)
- Reporting and, if required, Effectiveness Assessment (Section 4.4)

Finally, a series of recommendations are included to improve the SQMP based on the LACFCD's experience implementing the current SQMP under the 2001 Permit.

A goal of the proposed SQMP is to establish an adaptive management approach to afford the LACFCD flexibility to effectively and efficiently make changes to the program to protect water quality.

4.1 Program Management

The Flood Control Act states that the object and purposes of the LACFCD "are to provide for the control and conservation of the flood, storm, and other waste waters...and to conserve such waters for beneficial and useful purposes by spreading, storing, retaining, or causing to percolate into the soil...or to save or conserve in any manner, all or any of such waters, and to protect from damage from such flood or storm waters, the harbors, waterways, public highways and property..."

In accordance with the objectives stated in the Flood Control Act, the LACFCD oversees the planning, design, construction, and maintenance of flood protection facilities located within the LACFCD boundaries, which include incorporated and unincorporated areas of Los Angeles County.

4.1.1 Stormwater Quality Management Program Implementation

Implementation of the SQMP for the LACFCD is performed by the Watershed Management Division of Public Works and several other divisions of Public Works as is shown in **Table 4-1**.

Table 4-1. Implementation of SQMP Control Measures

Control Measure	Implementing Organization
Planning and Design	
Flood Control Facility Design	Architectural Engineering Division Design Division Project Management Division Water Resources Division Watershed Management Division

Control Measure	Implementing Organization
Training	Building and Safety Division Project Management Division Watershed Management Division
Construction	
BMP Implementation	Architectural Engineering Division Project Management Division
Inspections and Enforcement	Architectural Engineering Division Building and Safety Division Construction Division
Illicit Connections and Illicit Discharges	Construction Division Flood Maintenance Division
Training	Construction Division Watershed Management Division
Operation and Maintenance of Flood Control Facilities	
BMP Implementation	Construction Division Design Division Flood Maintenance Division Water Resources Division
Outreach	Construction Division Environmental Programs Division Flood Maintenance Division Public Relations Group
Illicit Discharge and Illicit Connections	Construction Division Environmental Programs Division Flood Maintenance Division Watershed Management Division
Training	Environmental Programs Division Flood Maintenance Division Watershed Management Division County Agricultural Commissioner/Weights and Measures
Operation and Maintenance of Headquarters Building and Maintenance Yards	
Parking Lot Runoff	Operational Services Division
Landscape Management	Operational Services Division
Yard SWPPPs	Flood Maintenance Division
Spill Response	Administrative Services Division Environmental Programs Division Flood Maintenance Division
Fueling	Administrative Services Division Flood Maintenance Division
Wash Rack	Administrative Services Division Flood Maintenance Division

Control Measure	Implementing Organization
Training	Administrative Services Division Flood Maintenance Division Operational Services Division Watershed Management Division County Agricultural Commissioner/Weights and Measures

4.1.2 Legal authority

The LACFCD possesses the necessary legal authority to regulate stormwater and non-stormwater discharges to its storm drain system, including the prohibition of illicit connections and illicit discharges (IC/IDs), as provided in the Los Angeles Flood Control Act, the Flood Control Channel Ordinance of the County of Los Angeles, and the Stormwater and Runoff Pollution Control Ordinance of the County of Los Angeles.

4.1.3 Fiscal Resources

The LACFCD's stormwater program is funded by the Flood Control District Fund, which includes property taxes, a special benefit assessment, and other revenue sources. The LACFCD also periodically pursues state and federal grants when appropriate.

The LACFCD will develop an annual stormwater program budget summary, which will be included in the Annual Report. Each annual stormwater budget summary will evaluate the actual expenditures for the previous year and project expenditures for the upcoming year. The budget summary will include the following budget categories: 1) Program Management, including the overall administrative costs for the stormwater program; 2) Implementation; including costs associated with the Flood Protection Facilities Program, and costs associated with the Operations and Maintenance Facilities Program; 3) Monitoring Program; and 4) Miscellaneous Expenditures.

4.1.4 Watershed Management

The 2001 Permit divided Los Angeles County into six Watershed Management Areas (WMAs), which are listed below. The LACFCD owns flood control facilities in all six of the WMAs. The WMAs are shown in **Figure 1-1**.

- | | |
|---|---|
| 1. Ballona Creek and Urban Santa Monica Bay | 4. Los Angeles River |
| 2. Malibu Creek and Rural Santa Monica Bay | 5. Dominguez Channel/Los Angeles Harbor |
| 3. Santa Clara River | 6. San Gabriel River |

In accordance with Part 3.F of the 2001 Permit, Permittees continued to meet quarterly or monthly through Watershed Management Committees (WMCs) to improve SQMP implementation and inter-agency coordination. As the owner of various flood control facilities and portions of the stormwater conveyance infrastructure in each of the WMAs, the LACFCD will continue to participate where appropriate as a stakeholder in meetings with Permittees of other stormwater Permits.

4.1.5 Reporting

The LACFCD will submit an annual report to document the status of SQMP implementation and, if required by the Permit, effectiveness assessments. Specific elements of the annual report are identified in Section 4.4 of this ROWD.

To accommodate data collection and report preparation, the LACFCD proposes November 15 as the deadline for Annual Report submittal. This date will allow adequate time for coordination among the affected Public Works divisions to gather all the final information needed to compile the Annual Report and adequate time for financial numbers to be finalized.

4.2 Flood Protection Facilities

The Flood Protection Facilities Program (Program) addresses water quality protection through the planning and design; construction; and maintenance of flood control facilities. The Program is comprised of three program elements which are designed to identify methods to minimize the generation and transport of pollutants.

4.2.1 Planning and Design of Flood Control Facilities

Description

The Planning and Design Program Element provides the processes whereby long term impacts of the LACFCD infrastructure projects on stormwater quality are considered and are addressed through the design of appropriate BMPs.

Existing Practices and Related Activities

Summary of Existing Practices

Flood Control Facility Design

Training

Flood Control Facility Design

To fulfill its flood protection mission, the LACFCD periodically undertakes capital improvement projects which, as discussed in Section 3.1, include flood control channels, storm drains, catch basins, and pump stations. Project design considers primarily regional flood relief benefits (i.e. peak flow and volume reduction) and secondarily water conservation benefits. Water quality features are incorporated when collaborative opportunities exist with outside agencies and outside funding is available.

The LACFCD also requires the implementation of post-construction BMPs for facilities wishing to connect to the LACFCD's MS4. Finally, the LACFCD is currently developing guidelines to incorporate low impact development principles into the design of its infrastructure projects.

Training

LACFCD provides annual stormwater training to staff. This training is provided in a "train the trainer" format. Training specific to each of the MS4 Permit SQMP programs

is provided. Attendees use the information provided to train staff in their divisions. Attendance at the training is documented.

4.2.2 Construction of Flood Control Facilities

Description

The Construction Program Element focuses on ensuring that the LACFCD's construction activities are performed in such a way as to minimize the pollutants generated and the potential for pollutants to enter the storm drain system during the construction phase.

Existing Practices and Related Activities

Summary of Existing Practices

BMP Implementation

Inspections and Enforcement

Training

BMP Implementation at LACFCD Projects

The LACFCD undertakes the construction of new storm drains, multi-use projects, and maintenance and rehabilitation of existing facilities.

The LACFCD follows Public Works' *Development Construction Model Program* and the *Plan Check and Inspection Policy*. The Model Program provides guidance regarding the Development Construction Program of the MS4 Permit. The *Plan Check and Inspection Policy* specifies requirements for the Development Planning and Development Construction Programs of the MS4 Permit and enforcement protocols for violation of these requirements.

Contracts prepared for construction of the LACFCD projects include requirements to comply with the Construction NPDES Stormwater General Permit, as appropriate, and identify penalties for non-compliance. The LACFCD uses the County-developed manual to guide contractors in the preparation of a Stormwater Pollution Prevention Plan (SWPPP).

Inspections and Enforcement

The LACFCD performs inspections of its projects, and has prepared three stormwater manuals:

- Construction Staff Guide (provides information on stormwater requirements)
- Construction BMP Manual
- Stormwater Prep Manual

Contractors are required to use these manuals to develop construction SWPPPs and select appropriate BMPs.

The LACFCD inspectors are present daily at LACFCD project sites. The information in the inspection forms is stored in a database. Contractor violations are addressed with verbal warnings or written notices. If a noncompliance problem is not corrected within two days of a written notice, the contractor is fined \$1,000 per day per violation. The inspector also coordinates with the California Department of Fish and Game, District Attorney, and Regional Board as needed.

Training

The LACFCD provides formal annual storm water compliance training prior to each storm season. There are three categories of formal annual training related to construction:

- Office Category: This training is provided to resident engineers, office engineers, and utility coordinators. It includes discussion of contract issues, Notice of Intent, Notice of Termination, and SWPPP preparation.
- Field Category: This training is provided to field inspectors and resident engineers. It covers the basic requirements of the storm water permits, compliance requirements, enforcement, how to complete inspection forms, and contract requirements.
- Permits Category: This training addresses issuance of permits to other entities proposing to discharge or operate in County right of way.

Each category of training includes an agenda and syllabus and an exam is administered following the training sessions.

Superintendents provide stormwater training to field staff and provide oversight to ensure that BMPs are implemented. The LACFCD also has an instructional video on stormwater compliance.

4.2.3 Operation and Maintenance of Flood Control Facilities

Description

The Operation and Maintenance Program Element focuses on activities and BMPs that address the potential for stormwater pollutant generation during operation and maintenance activities conducted at LACFCD facilities.

Existing Practices and Related Activities

Summary of Existing Practices
BMPs for Maintenance Activities
Outreach
Illicit Connections and Illicit Discharges
Training

BMPs for Maintenance Activities

The LACFCD maintains its MS4 facilities for flood protection. These facilities include channels, storm drains, pump stations, and catch basins. The maintenance activities include removing vegetation and debris from soft bottom channels in accordance with the *Maintenance Plan for the Annual Clearing of Earth-Bottom Control Channels*.

The LACFCD maintains approximately 500 miles of open channel, 52 pump stations, 8 trash booms, and 60 Continuous Deflective Separator units.

Contractors to the LACFCD provide weekly or as-needed cleaning of open channels and remove trash by hand or with equipment.

The LACFCD owns and maintains eight trash booms that have been installed to collect trash and debris from the Los Angeles River, Rio Hondo Channel, Dominguez Channel, Los Cerritos Channel, Wilmington Drain, and Ballona Creek. The collected wastes are disposed in landfills. In 2009, the eight trash booms resulted in the removal of approximately 4,300 tons of trash.

The LACFCD administers the catch basin cleanout contracts and oversees cleanout of over 80,000 catch basins in its MS4. Many of the catch basins have been retrofitted by other municipalities with connecting pipe screens or with automatic retracting screens to exclude trash from the MS4. A catch basin may have both a connecting pipe screen and an automatic retracting screen. The municipalities are responsible for maintaining the BMPs they have installed.

Frequency of catch basin cleanout is based on priority related to community trash generation:

- Priority A – Three to four times annually
- Priority B – Twice annually
- Priority C – Once annually

The contractor that performs catch basin cleanout must provide landfill dump tickets to verify the amount of material removed. LACFCD inspectors verify that catch basins have been cleaned. The contractor is required to stencil the inside of the catch basin to document that it has been cleaned.

Permits from regulatory agencies (e.g. California Department of Fish and Game) are obtained when required for clearing and cleaning of LACFCD facilities. Many of the BMPs utilized during the maintenance activities are specified by the permits issued by the regulatory agencies.

No metals-based pesticides or fertilizers are used for LACFCD flood control facility maintenance and LACFCD and Agricultural Commission applicators have State certifications. No sand or water blasting is performed in the flood control channels.

Outreach

Outreach activities by the LACFCD are focused on flood control facilities and include signage and transient outreach.

All catch basins have stencils that read *No Dumping – This Drains to Ocean*. The LACFCD oversees the maintenance contracts for catch basin stencils. When a contractor replaces or re-stencils, they stamp the date on the inside wall of the catch basin to show the last date of replacement. These stencils are updated every three to four years. The LACFCD also maintains catch basin stencils if damaged or faded stencils are observed during their routine maintenance activities.

In addition to catch basin stenciling, a “No Dumping” message is posted on storm drain inlets and access points to creeks and other relevant water bodies and channels.

The LACFCD implements a transient outreach program to control human sources of pollutants, including bacteria and trash. Transient encampments identified by LACFCD staff or from public complaints are posted for two weeks before they are removed. At the end of the two-week period, LACFCD staff arrives with local law enforcement and removes trash and debris from the encampment site. Hazardous waste contractors are brought in to remove human wastes. The LACFCD maintains contact with local law enforcement to prevent re-establishment of encampments.

The LACFCD participates in the Countywide 1(888) Clean-LA hotline and website. The 24-hour hotline number and website provide a centralized location for callers to find out about stormwater program information and it serves as the general public reporting contact for clogged catch basins, dumping, and illicit discharge violations.

Illicit Connections and Illicit Discharges

The LACFCD has an ongoing proactive program to identify and eliminate IC/IDs. Underground crews inspect storm drains for IC/IDs and the overall condition of storm drain pipes. Underground storm drains 42 inches or larger are inspected on a six-year cycle, storm drains in commercial and industrial areas (20 percent) are inspected every three years, and old storm drains and storm drains in problem areas (e.g. areas with high probability of illegal connections or discharges, such as a concentrated area of restaurants) are inspected annually. Open channels are inspected annually.

Illicit Connection Response Protocol

The LACFCD completes an Undocumented Connection Form for each suspected undocumented connection identified during the inspections and conducts follow-up investigations. The LACFCD initiates an investigation of reported illicit connections within 21 days of receiving the report. A field file is prepared for each undocumented connection and follow-up inspections are then scheduled to identify the source. Documentation includes photos, if entry is possible. Storm drains are generally located 6-16 feet below ground surface; therefore, many illicit connections are to the catch basins. Most undocumented connections are parking lot or yard drains or permitted drains. A monthly status report is prepared summarizing the status of IC/ID activities. LACFCD also has an IC/ID first responder procedures manual.

Responsible parties of undocumented connections must sign a water quality agreement and obtain a permit or the connection is eliminated. The key elements of the water quality agreement include:

- The owner(s) of the property agree to discharge only stormwater

- The owner(s) of the property are responsible for the quality of water discharged through the connection
- If non-stormwater/material is released through the connection, the owner(s) is required to take immediate and appropriate corrective measures and report the incident to LACFCD
- The owner(s) is required to reimburse LACFCD for all costs associated with cleaning/repair of storm drain, watercourse, or channel due to misuse of the storm drain connection
- The owner(s) give irrevocable consent to the representatives of LACFCD to inspect the drainage facilities at the site

Once a connection is determined to be illicit, it is terminated within 180 days of the determination. Accepted connections are recorded and documented.

Illicit Discharge Response Protocol

The LACFCD responds to reports of illicit discharges within one business day.

The LACFCD takes enforcement actions where needed to control illicit discharges to its MS4. The enforcement action is predicated on the amount of waste discharged, type of material discharged, and cooperation of the responsible party. The objective is to get the discharger to contract directly with a cleanup firm, but the LACFCD will contract with a cleanup firm if a responsible party cannot be identified or if cleanup needs to be expedited. In these instances, costs are sometimes fully or partially recovered from the responsible party.

Training

The LACFCD has an assigned training coordinator with responsibility for providing training for staff on NPDES and all other environmental permits. The training coordinator participates in the annual stormwater training provided by the LACFCD. On the job training is provided for identification of IC/IDs. DVDs addressing construction and good housekeeping BMPs are available and are used for training staff. Participation in the NPDES training is mandatory for all applicable staff. The training coordinator reviews SWPPPs and addresses them in the training.

Inspection staff is trained before receiving field assignments. This training is supplemented by attendance at seminars and workshops.

4.3 Operations and Maintenance Facilities

The Operations and Maintenance Facilities Program addresses water quality protection at the LACFCD fixed facilities by identifying control measures that minimize the pollutants generated and the potential for pollutants to enter the storm drain system. The Program consists of seven control measures implemented at fixed facilities.

Description

This program focuses on activities and BMPs that address the potential for stormwater pollutant generation during maintenance activities conducted at LACFCD buildings and maintenance yards.

Existing Practices and Related Activities

Summary of Existing Practices
Headquarters Building and Maintenance Yards
Parking Lot Runoff
Landscape Management
Yard SWPPPs
Spill Response
Fueling
Wash Rack
Training

Parking Lot Runoff

The parking lots at the Headquarters Building and the maintenance yards are cleaned regularly. Cleaning includes sweeping or the use of a leaf blower to remove any visible leaves or trash. Parking lots are not washed.

Landscape Management

The LACFCD follows all Federal, State, and local laws pertaining to the purchase, storage, and use of pesticides and herbicides. Pesticides are sprayed when needed and fertilizer and re-seeding of turf areas is conducted twice annually.

BMPs and procedures are in place to prevent runoff of excess fertilizers and other herbicides in irrigation water from landscaped areas. Staff takes measures to prevent over-watering and blowing or raking leaves into the street. Wash water, sweepings, and sediments are properly disposed, and pesticides and fertilizers are applied using proper methods.

Maintenance supervisors oversee the timing of pesticide applications. The LACFCD schedules pesticide applications well in advance and only during dry weather periods. Spot spraying and fertilizer application are scheduled in advance and are coordinated around predicted rain events. In some cases, the County's Agricultural Commissioner/Weights and Measures is contracted for pesticide and herbicide application. In other instances, outside licensed vendors or landscaping contractors are retained. They are required to follow all applicable laws, regulations, and protocols as described in their contracts.

Yard SWPPPs

The LACFCD has prepared SWPPPs for each maintenance yard operated by the LACFCD. In general, yard staff is directed to:

- Use absorbent materials on small spills rather than hosing down the area
- Keep ample supply of spill cleanup materials at pump islands
- Routinely inspect and ensure proper function of the underground tank's computer sensor
- Inspect fueling area for spills on a regular schedule
- Ask truck operators to remain with the truck while the material transfer is in process

Spill Response

All Flood Maintenance vehicles and facilities are equipped with spill kits. When needed, the LACFCD may call upon other Public Works Divisions or contractors when needed to handle larger events that cannot be managed with spill kits.

Fueling

LACFCD has implemented several BMPs at the fueling stations located at the Headquarters Building and at the maintenance yards. Canopies cover the fueling areas to prevent rain from washing away drips and spilled materials. Vapor recovery nozzles are used to reduce drips and air pollution. Absorbent material is present on-site to contain spills. A broom and shovel are also located at fuel pump stations for quick cleanup.

Staff prevents and cleans up spills by not topping off tanks while fueling, using the pump appropriately, immediately cleaning spills using the spill kits at the facility, and ensuring that there is no underground tank leakage into the secondary containment tank.

Wash Rack

Wash racks are tied to clarifiers, which are generally pumped out routinely. Wash water is contained in the wash rack areas and is not allowed to flow into the storm drain system. Wash racks are covered by canopies and have concrete floors sloped to a drain in the center. Staff follows the applicable facility SWPPP when using a wash rack.

LACFCD staff ensures that vehicles inside the wash rack are properly positioned so that wash water may not drain to a storm drain catch basin. Vehicles are cleaned of debris and trash before washing to prevent plugging of grates and overflow of wash water to a storm drain catch basin. LACFCD staff periodically cleans clarifiers to prevent plugging which may cause overflow.

Training

Staff receives annual training on the proper BMPs, fueling, and cleanup procedures.

Staff is also trained on the proper use of spill kits to clean up spills at the fueling station. The County's Agricultural Commissioner/Weights and Measures provides training and certifies pertinent LACFCD personnel in pesticide application.

The training coordinator reviews SWPPPs for maintenance yards and addresses them in the training, which is provided to field staff at all maintenance yards.

4.4 Reporting and Effectiveness Assessment

4.4.1 Annual Report

The purpose of the Annual Report is to document the status of the SQMP implementation, present results from activities implemented by the LACFCD, and provide a compilation of deliverables and milestones reached during the previous 12 months. Updates, improvements, or revisions to the SQMP may also be proposed in the Annual Report. The reporting format will be revised following the update of the SQMP. The Annual Report will contain the following elements:

- Executive summary regarding SQMP implementation
- Summary of activities conducted by LACFCD
- Identification of BMPs and discussion of their effectiveness
- Summary of LACFCD coordination efforts with WMAs and other stormwater Permittees within Los Angeles County
- Summary of monitoring program status and data
- Effectiveness Assessment of BMPs/activities, if required
- Recommendations to improve the SQMP, BMPs, performance standards, and reporting format

4.4.2 Program Effectiveness Assessment

If required by the Permit, the LACFCD would develop a program effectiveness assessment strategy to determine whether its program is achieving intended outcomes and, ultimately, whether continued implementation will result in maintaining or improving water quality.

The program effectiveness assessment strategy would be based upon the California Stormwater Quality Association (CASQA) Program Effectiveness Guidance (CASQA 2007), or if available, the update to this guidance, which is currently under development by CASQA.

Outcome levels have been proposed by CASQA to categorize and describe the desired results of goals of the activities and BMPs. There are six outcome levels as defined by the CASQA Program Effectiveness Assessment Guidance.

- Outcome Level 1: Documenting Activities
- Outcome Level 2: Raising Awareness
- Outcome Level 3: Changing Behavior

- Outcome Level 4: Reducing Loads from Sources
- Outcome Level 5: Improving Runoff Quality
- Outcome Level 6: Protecting Receiving Water Quality

In past years, the LACFCD has evaluated the effectiveness of its program at a fundamental level (i.e., Levels 1 and 2). If required by the permit, the LACFCD would develop a long-term strategy to conduct a more comprehensive effectiveness assessment of the stormwater program. The strategy will address the stormwater program in terms of achieving both programmatic goals (i.e., raising awareness, changing behavior) and environmental goals (i.e., reducing pollutant discharges, improving environmental conditions). Different tools would be used to assess these different types of goals or outcomes. Assessments of runoff quality and receiving water quality (Outcome Levels 5 and 6) will likely need integrated information from the WMAs.

In developing the Effectiveness Assessment, management questions would be developed to focus the assessment. Management questions might include:

- Was the Program Element/activity developed and implemented in accordance with the NPDES permit provisions, SQMP control measures, and performance standards (Level 1 Outcome)?
- Did the Program Element/activity raise the target audience's awareness of an issue (Level 2 Outcome)?
- Did the Program Element/activity change a target audience's behavior, which results in implementation of recommended BMPs (Level 3 Outcome)?
- Did the Program Element/activity reduce the load of pollutants from the sources to the storm drain system (Level 4 Outcome)?
- Did the Program Element/activity reduce pollutants in stormwater discharged from the storm drainage system (Level 5 Outcome)?
- Did the Program Element/activity result in a measurable change in the receiving water (Level 6 Outcome)?

Once focused by appropriate questions, reference or baseline conditions would be established and assessment techniques selected. Generally, evaluations would be conducted by reviewing how well the LACFCD implemented activities and whether or not the completion of these activities are likely to lead to stormwater quality improvement. If correlations can be established between the activities (e.g., conducting a survey, assessing BMP implementation) and water quality, it may allow predictions of water quality resulting from implementation of certain types of activities.

The establishment of quantitative program effectiveness measures for the stormwater program should result in more tangible triggers upon which to base SQMP revisions. These combined with the addition of management questions for the monitoring program would advance the LACFCD's ability to progressively improve the SQMP and meet its obligations to responsibly manage public funds as well as to protect the quality of the environmental resources. In the past, revisions to the SQMP have not been practical

due to a limited understanding of the causal relationship between management actions and receiving water quality.

4.5 Recommended Improvements to the SQMP from the Current Effort

4.5.1 Illicit Connection/Illicit Discharge Elimination Program Improvements

Currently, the LACFCD is required to eliminate all illicit connections and illicit discharges to the storm drain system and to document, track, and report all occurrences. The 2001 Permit requires the field screening of open channels, underground pipes, and underground pipes with a diameter of 36 inches or greater by specific dates. Based on an evaluation of patterns and trends of illicit connections and illicit discharges over the past three years, it can be concluded that the following land use types collectively contributed an average of 76 percent of all illicit connections and 83 percent of all illicit discharges discovered each year:

- High Density Single-Family Residential
- Retail and Commercial
- Light Industrial
- Multiple-Family Residential
- Mixed Residential

The LACFCD recommends that field screening be concentrated in the five land use types listed above as well as in heavy industrial land use areas as illicit discharges from such facilities pose a risk to receiving water quality (reports from heavy industrial land use areas have comprised 0.2 and 0.6 percent of all reported illicit connections and illicit discharges, respectively). Focusing investigations in these areas would allow the LACFCD to maximize resources and target the areas where the most frequent and most severe illicit connections and illicit discharges are currently found.

In addition, the LACFCD also recommends discontinuation of the annual trending report, which has been completed every year since 2003. The LACFCD has met the objective of analyzing the patterns and trends to identify priority areas for elimination of illicit connections and illicit discharges, as described above.

4.5.2 Legal Authority

If necessary, the LACFCD will seek to amend its ordinances to comply with the requirements of the new permit. It is recommended that the Regional Board provide a minimum of 12 months from the date of permit adoption to complete any necessary changes to the ordinance.

4.5.3 Annual Report Enhancements

The LACFCD recommends streamlining the Municipal Stormwater Permit Annual Report to only require the reporting of changes in information from the previous year's report, with a comment that certain information has remained the same in previous years.

To accommodate data collection and report preparation, the LACFCD proposes November 15 as the deadline for submitting the Annual Report. This will allow adequate time for coordination among affected Public Works divisions to gather the information needed to compile the report and adequate time for the financial numbers to be finalized.

The following Annual Report tables should be modified to eliminate confusion and improve the quality of data submitted:

- Section IV.F.10 – Delete and replace with the following illicit connections table:

Number of Suspected Illicit Connections Reported	Number of Suspected Illicit Connections Investigated	Number of Illicit Connections Terminated	Number of Suspected Illicit Connections found not to be Illicit	Number of Suspected Illicit Connections that resulted in Enforcement Action

- Section IV.F.13 – Delete and replace with the following illicit discharges table:

Number of Suspected Illicit Discharges Reported	Number of Suspected Illicit Discharges Investigated	Number of Illicit Discharges Terminated	Number of Suspected Illicit Discharges found not to be Illicit	Number of Suspected Illicit Discharges that resulted in Enforcement Action

5.0 MONITORING

Under the current 2001 Permit, the LACFCD performs certain monitoring and submits an annual monitoring report as described in the Monitoring and Reporting Program CI 6948. The monitoring performed by the LACFCD monitors the quality of the water that is collectively in the MS4 system.

5.1 Objectives of Monitoring

The overall goal of the monitoring program is to provide information to refine the stormwater programs of all the cities and other entities that discharge to the system. By providing this information, these other entities should then be in a better position to reduce pollutant loadings and increase protection of the beneficial uses of the receiving waters in Los Angeles County.

5.2 Monitoring Program Elements

If required by the Permit, the following elements would comprise the elements of the proposed monitoring program. The mass emission and water column toxicity elements would be directly managed and conducted by the LACFCD. The estuary and bioassessment elements are components of the larger regional monitoring efforts to

which the LACFCD would contribute and/or participate in as a stakeholder; the LACFCD would coordinate with municipal stormwater permittees to facilitate access to monitoring stations within LACFCD flood control facilities, but would not serve as the lead agency for these monitoring activities.

5.2.1 Core Program

Mass Emission Monitoring

Mass emission monitoring is conducted in order to approximate the pollutant loads in the MS4 system. This monitoring reflects contribution from all permitted and other discharges to the system up-gradient of the mass emission stations. It does not characterize discharges from LACFCD facilities. This monitoring assesses temporal trends at the mass emissions stations and evaluates flows in the MS4 system and their potential for exceeding water quality standards.

Water Column Toxicity Monitoring

Water column toxicity monitoring is performed in order to evaluate the toxicity of water flowing through the mass emission stations. The LACFCD will include in its annual report instances of toxicity so the Regional Board can notify other stormwater programs in the watershed so they can take steps to examine their potential sources.

5.2.2 Regional Program

Estuary Sampling

The objective of the estuary-sampling requirement is to "sample estuaries for sediment chemistry, sediment toxicity, and benthic macroinvertebrate community to determine the spatial extent of sediment fate from stormwater, and the magnitude of its effect."

Bioassessment

The objectives of stream bioassessment are to assess biological integrity and to detect biological trends and responses to pollution in receiving waters. Bioassessment includes the collection and identification of stream benthic macroinvertebrates, and assesses the quality and condition of the in-stream physical habitat and adjacent riparian zone. This information may complement the mass emission or water column toxicity monitoring, which tests water quality chemical parameters and only provides a measure of habitat conditions at the moment sampling occurs.

5.3 Description of Effort Under the 2001 Permit

The LACFCD conducts mass emission and water column toxicity monitoring and participates in bioassessment and estuary monitoring as described in the following sections.

5.3.1 Mass Emission Monitoring

- Monitor seven mass emission stations during the first storm of the sampling year and a minimum of two additional storms. Also, monitor these stations during a minimum of two dry-weather flows per sampling year.
 - Constituents monitored along with sampling and analytical methods are listed in **Appendix A**.
 - Locations monitored are shown in **Figure 5-1**.
 - Samples at mass emission stations may be taken with automatic samplers. Grab samples must be taken for some constituents such as pathogen indicators and oil and grease. Automated samplers are set to monitor storms of at least 0.25-inches of rainfall.
 - Samples at the Santa Clara River mass emission site are taken manually due to the infeasibility of installing automatic samplers. Flow-weighted composites are generally collected during the first three hours of a storm or for the storm's duration if it is less than three hours. One aliquot is taken approximately every 20 minutes during this time.
- Monitor six mass emission stations (automated stations only) for total suspended solids (TSS) during all storms with at least 0.25-inches of rainfall. Collected data to be used in conjunction with TSS correlation analysis.
 - An analysis of the correlation of TSS and other constituents of concern is performed and reported annually.

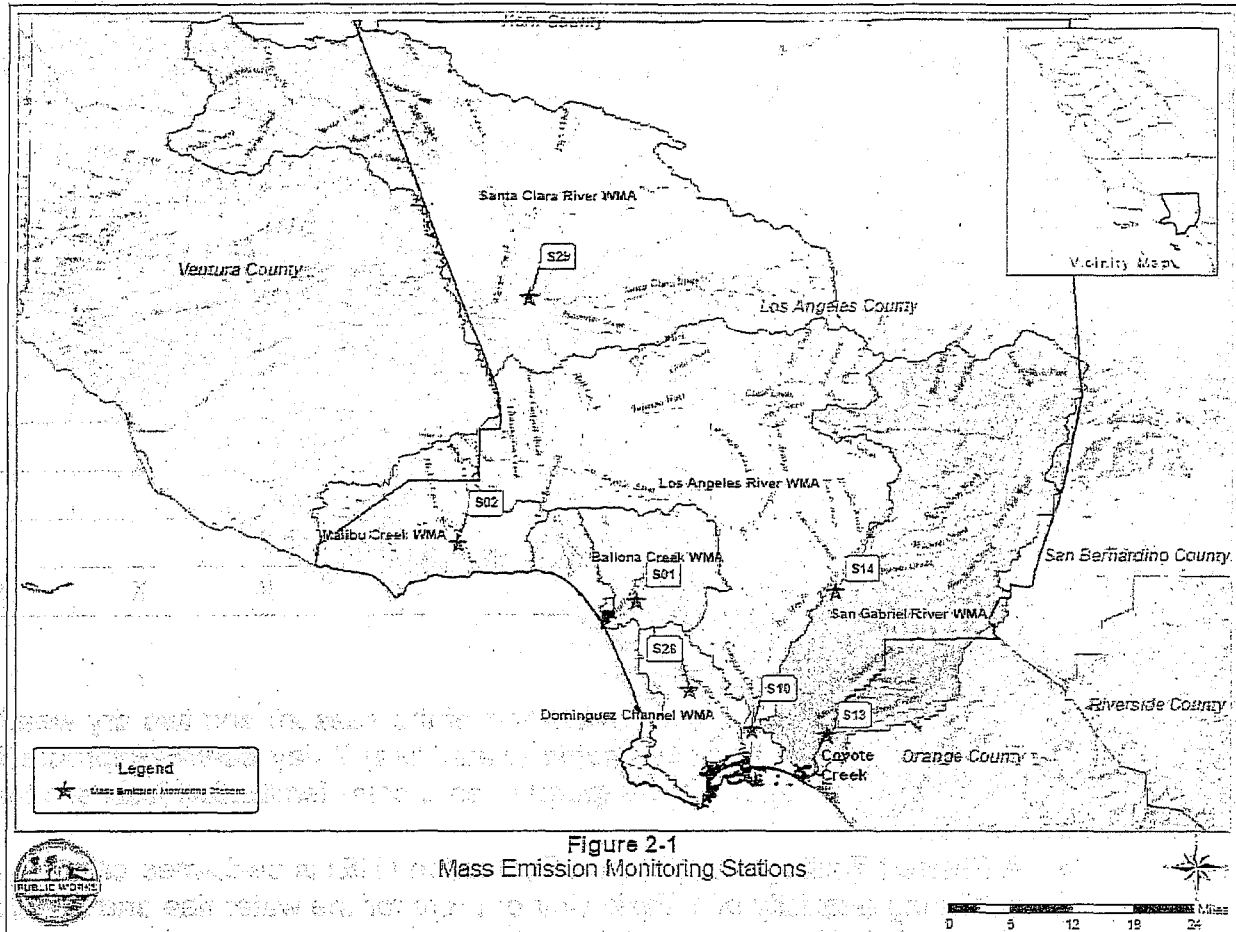


Figure 5-1. Map of Mass Emission Monitoring Stations

Results of the mass emissions monitoring are compared to the most applicable water quality objectives (WQOs) from the Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties and the California Toxics Rule. Every year, monitoring data are evaluated to determine constituents of concern (COCs). After the fourth season of monitoring, an Integrated Receiving Water Impacts Report was created and submitted to the Regional Board, serving as the Annual Monitoring Report as prescribed in the current Permit. In the August 2005 Integrated Receiving Water Impacts Report, a constituent was considered a COC if its frequency of exceedance ratio exceeded 0.5 and its mean exceedance ratio exceeded 1.0². COCs for each site are given in Table 5-1.

² The frequency at which the mean value did not meet the WQO was determined by dividing the total number of years a constituent was analyzed into the number of times the mean value of a constituent exceeded the Water Quality Standard (WQS) for a given year. The mean exceedance ratio was determined by dividing the WQS for a constituent into the constituent's mean value for each year, then calculating the average magnitude of exceedance.

Table 5-1. Constituents of Concern Identified for Each Watershed Based on Mass Emissions Monitoring Results

Constituents of Concern	San Gabriel River	Coyote Creek	Los Angeles River	Dominguez Channel	Ballona Creek	Malibu Creek	Santa Clara River
Fecal Coliform	X	X	X	X	X	X	X
Total Aluminum	X		X			X	X
Total Copper	X	X	X	X	X		
Total Lead	X	X	X	X	X		
Total Zinc			X	X			
Dissolved Copper			X	X			
Dissolved Lead		X	X	X	X		
Dissolved Zinc			X				
Diazinon				X			
Cyanide	X	X	X	X	X	X	X

5.3.2 Water Column Toxicity

- Monitor two storm events (including the first of the season) and two dry-weather events for toxicity. *Ceriodaphnia dubia* (water flea) 7-day survival/reproduction and *Strongylocentrotus purpuratus* (purple sea urchin) fertilization tests are used as a minimum.
 - A Phase I Toxicity Identification Evaluation (TIE) is performed on samples exhibiting a toxicity of 1 Toxic Unit or more for the water flea and a toxicity of 1 Toxic Unit or more for the purple sea urchin.
 - A Toxicity Reduction Evaluation is performed if a pollutant or class of pollutants is responsible for 50 percent of three or more TIEs at the same location. The Toxic Unit is calculated by dividing the 50% Lethal or Inhibition Concentration (LC50 or IC50) into 100.

Samples collected during wet weather events were more likely to exhibit toxicity. A summary of results from the Integrated Receiving Water Impacts Report from 1994 to 2005 as well as toxicity detected in more recent years is shown in **Table 5-2**. In most cases, toxicity was not persistent and was attributed to volatile compounds.

Table 5-2. Summary of Toxicity Test by Watershed

Source and Season	San Gabriel River	Coyote Creek	Los Angeles River	Dominguez Channel	Ballona Creek	Malibu Creek	Santa Clara River
Integrated Receiving Water Impacts Report (1994-2005)							
<i>Wet Weather</i>	--	CDS, CDR, SUF	CDS, SUF	CDS, CDR, SUF	CDR, SUF	CDR	CDS
<i>Dry Weather</i>	--	SUF	SUF	SUF	SUF	--	--
Annual Monitoring Reports (2005-2010)							
<i>Wet Weather</i>							
2005-06	--	--	SUF	CDS, CDR, SUF	SUF	--	--
2006-07	SUF	SUF	SUF	SUF	SUF	SUF	SUF
2007-08	SUF	--	--	SUF	--	CDS, CDR, SUF	SUF
2008-09	--	SUF	SUF	--	SUF	CDS, CDR, SUF	--
2009-10	--	--	--	--	--	--	--
<i>Dry Weather</i>							
2005-06	--	--	--	--	--	CDS, CDR	--
2006-07	--	--	--	--	SUF	--	--
2007-08	--	--	CDS, CDR	--	SUF	--	--
2008-09	--	--	SUF	--	--	--	--
2009-10	--	--	--	--	--	--	--

Notes:

CDS = Ceriodaphnia survival toxicity

CDR = Ceriodaphnia reproduction toxicity

SUF = Sea Urchin fertilization toxicity

5.3.3 Estuary Monitoring

- Participate in the SCCWRP Bight '03 project, specifically with respect to the project's estuary sampling component.

Complete results from the 2003 project were reported on the SCCWRP website³ as of Summer 2007. Five estuaries did not meet the sediment quality objectives. Dominguez Channel Estuary had the most number of results that did not meet the sediment quality objectives while the San Gabriel River Estuary had the least. In the majority of estuaries, metals, DDT, and chlordane were above the sediment quality objectives. However, results from the Benthic Macrofauna Program indicated that the sediment dwelling organisms were in good condition in 2003 and were not changing rapidly. The Demersal Fishes and Megabenthic Invertebrates Program indicated that those soft-bottom habitat species were also healthy in 2003, more so than compared to conditions in the 1970s.

³ <http://www.sccwrp.org/Documents/BightDocuments/Bight03Documents>

5.3.4 Bioassessment Monitoring

- Participate in the SMC and with the SWAMP in development of a regional Index of Biological Integrity (IBI).
- Perform bioassessment monitoring every June.
- Monitor a minimum of 20 sampling sites and coordinate with SMC in site selection.
- Collect a minimum of three replicate samples at each site.
- Submit annual monitoring report containing all physical, chemical, and biological data collected and analyzed during bioassessment.

The 2008-2009 Annual Monitoring Report included a Final Report on the Bioassessment Monitoring Program and contained the following general conclusions. In the last five years, the majority of organisms collected from monitoring sites have been moderately to highly tolerant of stream impairments. Monitoring reaches located in highly modified, concrete-lined channels have received an IBI rating of Very Poor. However, other reaches have ranged from Very Poor to Good. There is a strong correlation between the watershed elevation and IBI scores, indicating that the mid to upper reaches of the watersheds (and less urbanized areas) have higher quality benthic communities than those in the lower elevation urbanized areas of the watersheds. Analysis of the IBI scores for six survey years through 2008 did not indicate any substantial trend towards degradation or improvement at any of the sites.

5.4 Recommended Improvements to Monitoring Effort Under the 2001 Permit

The 2001 Permit states that the results of the monitoring program should be used to "refine the SQMP for the reduction of pollutant loadings and the protection and enhancement of the beneficial uses of the receiving waters in Los Angeles County." The SQMP that is referred to is the stormwater quality management plan for all the permittees under the Permit. Techniques to quantify the relationship between stormwater quality management plan implementation and water quality are still in their infancy and will mature through an iterative process over many Permit cycles. The recommendations described in this ROWD have been made with this in mind. Resources are proposed to be shifted toward those studies and monitoring programs that allow for a better measure of SQMP effectiveness and lead to reduced pollutant loading from urban and storm runoff.

In preparing this ROWD and consistent with the ROWD dated June 12, 2006, the LACFCD has taken into account the five core management questions set forth in the SMC report entitled *Model Monitoring Program for Municipal Separate Storm Sewer Systems in Southern California*:

- Question 1: Are conditions in receiving waters protective, or likely to be protective of beneficial uses?
- Question 2: What is the extent and magnitude of the current or potential receiving water problems?
- Question 3: What is the relative urban runoff contribution to the receiving water problems?

Question 4: What are the sources to urban runoff that contribute to receiving water problems?

Question 5: Are conditions in receiving waters getting better or worse?

5.4.1 Mass Emission Monitoring

- Wet weather data has been collected at most mass emission stations for approximately ten years. Several constituents that consistently exceed WQOs exhibit no statistically significant long-term trend as discussed in the Integrated Receiving Water Impacts Report, and it is unlikely that these constituents will be reduced to below WQOs in a short timeframe. Using existing data, several data modeling exercises were performed to simulate different sampling strategies for wet weather data. It was concluded that collecting samples two times a year or three times on alternate years would be a sufficient sampling frequency to show the trends over time to reach the WQO. Modeling efforts and a more detailed discussion of sampling frequency can be found in the Integrated Receiving Water Impacts Final Report.

The LACFCD recommends monitoring two storms and two dry weather events per year at the Mass Emission stations. This monitoring strategy would capture the first storm of the season and an additional storm for relative measure. The two dry events would combine to serve as an assessment of dry weather flows in contrast to the wet weather events.

- Data are collected and analyzed annually for correlations between constituents of concern and TSS. Studies from previous years have shown TSS to correlate with volatile suspended solids, nutrients, copper, and zinc for most sites. Continuing these studies will help us understand any new and past observed correlations.

The LACFCD recommends continuing the sampling of all storms with rainfall exceeding 0.25-inches for TSS at mass emission sites with an automatic sampler. Results will be used to assess the variability of TSS over time and between storms.

- For many constituents, nearly all results were lower than their corresponding Minimum Level (ML). The monitoring and reporting requirements of the 2001 Permit state that constituents monitored at mass emission stations which are below the ML and below WQOs for 75 percent of the first 48 events monitored do not need to be further analyzed, except for an annual confirmation sampling during the first storm event.

The LACFCD recommends that monitoring shall continue for those constituents that meet the above criteria only during the first storm event. The list of constituents proposed to be eliminated from routine monitoring events is provided in Appendix B.

5.4.2 Water Column Toxicity

Only 9.6 percent of all toxicity tests for *C. dubia* (water flea) resulted in TIEs and no trends were apparent. Furthermore, no dry weather toxicity tests for *C. dubia* were toxic.

Therefore, the LACFCD recommends reducing the dry-weather *C. dubia* toxicity testing at the Mass Emissions stations to one test per year unless the first dry weather event *C. dubia* test of each year exhibits toxicity; in which case the second dry weather event should also be tested for *C. dubia* toxicity.

LACFCD recommends that the Regional Board review the Environmental Protection Agency test method for estimating chronic toxicity of effluents and receiving waters to west coast marine and estuarine organisms and the current science in that field, and issue guidance on whether or not to use sea salts in the high effluent percentage test solution. Two of the three laboratories that conducted toxicity tests asserted that sea salts are themselves toxic to embryos in the sea urchin fertilization toxicity test.

If use of hypersaline brine is the preferred methodology to sea salts for toxicity testing, then the LACFCD recommends that the Regional Board issue new guidance on the applicable value of the Toxic Unit to use to indicate that a sample is substantially toxic. All three laboratories that conducted toxicity tests asserted that a value greater than or equal to 2.00 is most appropriate and will reasonably lead to conclusive Phase I TIE results.

5.4.3 Estuary Monitoring

Based on a preliminary review of available results, it appears that the Bight '03 project has been conducted such that the requirements of the 2001 Permit have been fulfilled. Thus, there is a better understanding of the extent and magnitude of impairments in estuaries within Los Angeles County. While some characterization work will remain necessary, the LACFCD recommends that it is time to look more systematically at 1) determining the sources of urban runoff that contribute to elevated sediment toxicity levels, and 2) how to reduce that contribution. The former question corresponds to question 4 in the SMC Model Monitoring Program; the latter, while not a question formulated in the Model Monitoring Program, is essential for improving estuary sediment quality.

The LACFCD recommends continuing participation in and funding future bight-wide studies (e.g., Bight '08). However, its contribution should be directed toward follow-up studies designed to answer questions most pertinent to reducing toxicant loading into estuaries within Los Angeles County. These questions will be formulated in the coming months in consultation with Regional Board and SCCWRP, and may include, but are not limited to, the following:

- What are the specific toxicants causing recurring sediment toxicity in Ballona Creek Estuary? Dominguez Channel Estuary?
- What are sources of urban runoff that contribute to sediment toxicity?
- What are the partitioning coefficients between water column and sediment?

- Is there a suspended sediment toxicity sampling protocol?
- What are the sediment transport mechanisms and deposition patterns?
- What is the state of current technology available to reduce toxicant loading from urban and storm runoff?

Future sediment quality evaluation should follow the three lines of evidence protocols of the recently adopted Sediment Quality Objectives.

5.4.4 Bioassessment Monitoring

The LACFCD will continue to participate in the SMC Bioassessment Regional Monitoring Program, which to ensure more uniform monitoring in southern California, has the stated goal of producing:

- Field Manual
- Quality Assurance Manual
- Information Management Manual

LACFCD will also participate in the SMC's development of an assessment report of bioassessment data collected to date.

A draft IBI is currently under development by the SMC and the LACFCD recommends implementation of its guidelines in the LACFCD's bioassessment program as soon as a draft is released.

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List of Analytical Methods

Class Constituent	Sample Type	EPA Method	PQL (ML)	MDL	Units	Preservation	Holding Time
Conventional							
Oil and Grease	Grab	EPA413.1/EPA1654A	5	0.4	mg/L	H ₂ SO ₄	28 days
Total Phenols	Grab	EPA420.1	0.1	0.1	mg/L	H ₃ PO ₄ , CuSO ₄	7 days
Cyanide	Grab	SM4500-CNE	0.005	0.005	mg/L	NaOH	14 days
pH	Comp	SM4500H B	N/A	NA		-	immed.
Dissolved Oxygen	Grab	SM4500O G	5	0.4	mg/L	-	immed.
Indicator Bacteria							
Total Coliform	Grab	SM9221E/SM9221B	20	20	MPN/100ml	Na ₂ S ₂ O ₃	6 hours
Fecal Coliform	Grab	SM9221E/SM9221B	20	20	MPN/100ml	Na ₂ S ₂ O ₃	6 hours
Ratio Fecal Coliform/Total Coliform							
Fecal Streptococcus	Grab	SM9230B	20	20	MPN/100ml	Na ₂ S ₂ O ₃	6 hours
Fecal Enterococcus	Grab	SM9230B	20	20	MPN/100ml	Na ₂ S ₂ O ₃	6 hours
General							
Chloride	Comp	SM4110B	2	1	mg/L	-	28 days
Fluoride	Comp	SM4110B	0.1	0.1	mg/L	-	28 days
Nitrate (NO ₃)	Comp	SM4110B	0.1	0.1	mg/L	-	48 hours
Sulfate	Comp	SM4110B	1	0.1	mg/L	-	48 hours
Alkalinity	Comp	SM2320B	2	2	mg/L	-	14 days
Hardness	Comp	SM2340C	2	2	mg/L	HNO ₃ or H ₂ SO ₄	6 months
COD	Comp	SM5220D	20	10	mg/L	H ₂ SO ₄	28 days
TPH	Grab	EPA418.1	5	0.4	mg/L	H ₂ SO ₄	28 days
Specific Conductance	Comp	SM2510B	1	1	umhos/cm	-	immed.
Total Dissolved Solids	Comp	SM2540C	2	2	mg/L	-	7 days
Turbidity	Comp	SM2130B	0.1	0.1	NTU	-	48 hours
Total Suspended Solids	Comp	SM2540D	-2	1	mg/L	-	7 days
Volatile Suspended Solids	Comp	SM2540E	1	1	mg/L	-	7 days
MBAS	Comp	SM5540-C	0.5	0.01	mg/L	-	48 hours
Total Organic Carbon	Comp	SM5310B/EPA415.1	1	0.4	mg/L	HCl, H ₂ SO ₄ , or H ₃ PO ₄	28 days
BOD	Comp	SM5210B	2	1	mg/L	-	48 hours
Nutrients							
Dissolved Phosphorus	Comp	SM4500-PE	0.05	0.05	mg/L	-	48 hours
Total Phosphorus	Comp	SM4500-PE	0.05	0.05	mg/L	H ₂ SO ₄	28 days
NH ₃ -N	Comp	SM4500-NH3	0.1	0.1	mg/L	H ₂ SO ₄	28 days
Nitrate-N	Comp	SM4110B	0.5	0.03	mg/L	-	48 hours
Nitrite-N	Comp	SM4110B	0.03	0.03	mg/L	-	48 hours
Kjeldahl-N	Comp	SM4500NHorg	0.1	0.1	mg/L	H ₂ SO ₄	28 days
Metals							
Dissolved Aluminum	Comp	EPA200.8	100	50	ug/l	HNO ₃	6 months
Total Aluminum	Comp	EPA200.8	100	50	ug/l	HNO ₃	6 months
Dissolved Antimony	Comp	EPA200.8	0.5	0.2	ug/l	HNO ₃	6 months
Total Antimony	Comp	EPA200.8	0.5	0.2	ug/l	HNO ₃	6 months
Dissolved Arsenic	Comp	EPA200.8	1	0.2	ug/l	HNO ₃	6 months
Total Arsenic	Comp	EPA200.8	1	0.2	ug/l	HNO ₃	6 months
Dissolved Beryllium	Comp	EPA200.8	0.5	0.1	ug/l	HNO ₃	6 months
Total Beryllium	Comp	EPA200.8	0.5	0.1	ug/l	HNO ₃	6 months
Dissolved Cadmium	Comp	EPA200.8	0.25	0.1	ug/l	HNO ₃	6 months
Total Cadmium	Comp	EPA200.8	0.25	0.1	ug/l	HNO ₃	6 months
Dissolved Chromium	Comp	EPA200.8	0.5	0.5	ug/l	HNO ₃	6 months
Total Chromium	Comp	EPA200.8	0.5	0.5	ug/l	HNO ₃	6 months
Dissolved Chromium +6	Comp	EPA218.6	5	0.25	ug/l	-	24 hours

PQL = minimum level (ML)

MDL = method detection limit

- = No preservation required other than cooling the sample to 4 oC.

Class Constituent	Sample Type	EPA Method	PQL (ML)	MDL	Units	Preservation	Holding Time		
Metals									
Total Chromium +6	Comp	EPA218.6	5	0.25	ug/l	-	24 hours		
Dissolved Copper	Comp	EPA200.8	0.5	0.5	ug/l	HNO ₃	6 months		
Total Copper	Comp	EPA200.8	0.5	0.5	ug/l	HNO ₃	6 months		
Dissolved Iron	Comp	EPA200.8	100	50	ug/l	HNO ₃	6 months		
Total Iron	Comp	EPA200.8	100	50	ug/l	HNO ₃	6 months		
Dissolved Lead	Comp	EPA200.8	0.5	0.2	ug/l	HNO ₃	6 months		
Total Lead	Comp	EPA200.8	0.5	0.2	ug/l	HNO ₃	6 months		
Dissolved Mercury	Comp	EPA245.1	0.5	0.1	ug/l	HNO ₃	6 months		
Total Mercury	Comp	EPA245.1	0.5	0.1	ug/l	HNO ₃	6 months		
Dissolved Nickel	Comp	EPA200.8	1	0.5	ug/l	HNO ₃	6 months		
Total Nickel	Comp	EPA200.8	1	0.5	ug/l	HNO ₃	6 months		
Dissolved Selenium	Comp	EPA200.8	1	0.5	ug/l	HNO ₃	6 months		
Total Selenium	Comp	EPA200.8	1	0.5	ug/l	HNO ₃	6 months		
Dissolved Silver	Comp	EPA200.8	0.25	0.1	ug/l	HNO ₃	6 months		
Total Silver	Comp	EPA200.8	0.25	0.1	ug/l	HNO ₃	6 months		
Dissolved Thallium	Comp	EPA200.8	1	0.1	ug/l	HNO ₃	6 months		
Total Thallium	Comp	EPA200.8	1	0.1	ug/l	HNO ₃	6 months		
Dissolved Zinc	Comp	EPA200.8	1	1	ug/l	HNO ₃	6 months		
Total Zinc	Comp	EPA200.8	1	1	ug/l	HNO ₃	6 months		
Semi-Volatiles Organics (EPA 625)									
2-Chlorophenol	Comp	EPA625	2	0.7	ug/l	Sodium thiosulfate if 7 days for extraction residual chlorine 40 days for analysis is present			
2,4-dichlorophenol	Comp	EPA625	1	0.4	ug/l				
2,4-dimethylphenol	Comp	EPA625	2	0.7	ug/l				
2,4-dinitrophenol	Comp	EPA625	3	1.00	ug/l				
2-nitrophenol	Comp	EPA625	3	1.00	ug/l				
4-nitrophenol	Comp	EPA625	3	1.00	ug/l				
4-chloro_3_methylphenol	Comp	EPA625	1	1.00	ug/l				
Pentachlorophenol	Comp	EPA625	2	0.7	ug/l				
Phenol	Comp	EPA625	1	0.4	ug/l				
2,4,6-trichlorophenol	Comp	EPA625	1	0.4	ug/l				
Base/Neutral									
Acenaphthene	Comp	EPA625	1	0.4	ug/l			Sodium thiosulfate if 7 days for extraction residual chlorine 40 days for analysis is present	
Acenaphthylene	Comp	EPA625	2	0.7	ug/l				
Anthracene	Comp	EPA625	2	0.7	ug/l				
Benzidine	Comp	EPA625	5	1.7	ug/l				
1,2 Benzanthracene	Comp	EPA625	0.1	0.03	ug/l				
Benzo(a)pyrene	Comp	EPA625	2	0.7	ug/l				
Benzo(k)fluoranthene	Comp	EPA625	2	0.7	ug/l				
Bis(2-Chloroethoxy) methane	Comp	EPA625	5	1.7	ug/l				
Bis(2-Chloroisopropyl) ether	Comp	EPA625	2	0.7	ug/l				
Bis(2-Chloroethyl) ether	Comp	EPA625	1	0.4	ug/l				
Bis(2-Ethylhexyl) phthalate	Comp	EPA625	5	1.7	ug/l				
4-Bromophenyl phenyl ether	Comp	EPA625	1	0.4	ug/l				
Butyl benzyl phthalate	Comp	EPA625	3	0.1	ug/l				
2-Chloronaphthalene	Comp	EPA625	10	3.4	ug/l				
4-Chlorophenyl phenyl ether	Comp	EPA625	0.1	0.04	ug/l				
Chrysene	Comp	EPA625	5	1.7	ug/l				
Dibenzo(a,h)anthracene	Comp	EPA625	0.1	0.04	ug/l				
1,3-Dichlorobenzene	Comp	EPA625	0.5	0.2	ug/l				
1,4-Dichlorobenzene	Comp	EPA625	0.5	0.2	ug/l				
1,2-Dichlorobenzene	Comp	EPA625	0.5	0.2	ug/l				

PQL = minimum level (ML)

MDL = method detection limit

- = No preservation required other than cooling the sample to 4°C.

Class Constituent	Sample Type	EPA Method	PQL (ML)	MDL	Units	Preservation	Holding Time
Base/Neutral							
3,3-Dichlorobenzidine	Comp	EPA625	5	1.7	ug/l	Sodium thiosulfate if residual chlorine is present	7 days for extraction 40 days for analysis
Diethyl phthalate	Comp	EPA625	2	0.7	ug/l		
Dimethyl phthalate	Comp	EPA625	2	0.7	ug/l		
di-n-Butyl phthalate	Comp	EPA625	10	3.4	ug/l		
2,4-Dinitrotoluene	Comp	EPA625	5	1.7	ug/l		
2,6-Dinitrotoluene	Comp	EPA625	5	1.7	ug/l		
4,6 Dinitro-2-methylphenol	Comp	EPA625	5	1.00	ug/l		
1,2-Diphenylhydrazine	Comp	EPA625	1	0.4	ug/l		
di-n-Octyl phthalate	Comp	EPA625	10	3.4	ug/l		
Fluoranthene	Comp	EPA625	0.05	0.02	ug/l		
Fluorene	Comp	EPA625	0.1	0.04	ug/l		
Hexachlorobenzene	Comp	EPA625	1	0.4	ug/l		
Hexachlorobutadiene	Comp	EPA625	1	0.4	ug/l		
Hexachloro-cyclopentadiene	Comp	EPA625	5	1.7	ug/l		
Hexachloroethane	Comp	EPA625	1	0.4	ug/l		
Indeno(1,2,3-cd)pyrene	Comp	EPA625	0.05	0.02	ug/l		
Isophorone	Comp	EPA625	1	0.4	ug/l		
Naphthalene	Comp	EPA625	0.2	0.07	ug/l		
Nitrobenzene	Comp	EPA625	1	0.4	ug/l		
N-Nitroso-dimethyl amine	Comp	EPA625	5	1.7	ug/l		
N-Nitroso-diphenyl amine	Comp	EPA625	1	0.4	ug/l		
N-Nitroso-di-n-propyl amine	Comp	EPA625	5	1.7	ug/l		
Phenanthrene	Comp	EPA625	0.05	0.02	ug/l		
Pyrene	Comp	EPA625	0.05	0.02	ug/l		
1,2,4-Trichlorobenzene	Comp	EPA625	1	0.4	ug/l		
Chlorinated Pesticides							
Aldrin	Comp	EPA608	0.005	0.004	ug/l	Sodium thiosulfate if residual chlorine is present	7 days for extraction 40 days for analysis
alpha-BHC	Comp	EPA608	0.01	0.003	ug/l		
beta-BHC	Comp	EPA608	0.005	0.005	ug/l		
delta-BHC	Comp	EPA608	0.005	0.005	ug/l		
gamma-BHC (lindane)	Comp	EPA608	0.02	0.004	ug/l		
alpha-chlordane	Comp	EPA608	0.1	0.04	ug/l		
gamma-chlordane	Comp	EPA608	0.1	0.04	ug/l		
4,4'-DDD	Comp	EPA608	0.05	0.01	ug/l		
Sodium 4,4'-DDE	Comp	EPA608	0.05	0.004	ug/l		
4,4'-DDT	Comp	EPA608	0.01	0.01	ug/l		
Dieldrin	Comp	EPA608	0.01	0.002	ug/l		
alpha-Endosulfan	Comp	EPA608	0.02	0.015	ug/l		
beta-Endosulfan	Comp	EPA608	0.01	0.004	ug/l		
Endosulfan sulfate	Comp	EPA608	0.05	0.05	ug/l		
Endrin	Comp	EPA608	0.01	0.006	ug/l		
Endrin aldehyde	Comp	EPA608	0.01	0.01	ug/l		
Heptachlor	Comp	EPA608	0.01	0.003	ug/l		
Heptachlor Epoxide	Comp	EPA608	0.01	0.01	ug/l		
Toxaphene	Comp	EPA608	0.5	0.24	ug/l		
Polychlorinated Biphenyls							
Aroclor-1016	Comp	EPA608	0.5	0.065	ug/l	Sodium thiosulfate if residual chlorine is present	7 days for extraction 40 days for analysis
Aroclor-1221	Comp	EPA608	0.5	0.065	ug/l		
Aroclor-1232	Comp	EPA608	0.5	0.065	ug/l		
Aroclor-1242	Comp	EPA608	0.5	0.065	ug/l		

PQL = minimum level (ML)

MDL = method detection limit

- = No preservation required other than cooling the sample to 4 oC.

Class Constituent	Sample Type	EPA Method	PQL (ML)	MDL	Units	Preservation	Holding Time
Polychlorinated Biphenyls							
Aroclor-1248	Comp	EPA608	0.5	0.065	ug/l		
Aroclor-1254	Comp	EPA608	0.5	0.065	ug/l		
Aroclor-1260	Comp	EPA608	0.5	0.065	ug/l		
Organophosphate Pesticides							
Chlorpyrifos	Comp	EPA507	0.05	0.02	ug/l	-	7 days
Diazinon	Comp	EPA507	0.01	0.003	ug/l	-	7 days
Prometryn	Comp	EPA507	2	0.7	ug/l	Sodium	14 days
Atrazine	Comp	EPA507	2	0.7	ug/l	thiosulfate if	14 days
Simazine	Comp	EPA507	2	0.7	ug/l	residual chlorine	14 days
Cyanazine	Comp	EPA507	2	0.7	ug/l	is present	14 days
Malathion	Comp	EPA507	1	0.4	ug/l		14 days
Herbicides							
Glyphosate	Comp	EPA547	5	5	ug/l	Na ₂ S ₂ O ₃	14 days
2,4-D	Comp	EPA515.3	0.02	0.015	ug/l	-	7 days
2,4,5-TP-SILVEX	Comp	EPA515.3	0.2	0.07	ug/l	-	7 days

PQL = minimum level (ML)

MDL = method detection limit

- = No preservation required other than cooling the sample to 4 °C.

Appendix B

Constituents Proposed to be Eliminated from Routine Monitoring Events at Mass Emission Stations

Constituents Proposed to be Eliminated from Routine Monitoring Events at Mass Emission Stations

Parameter	Percent of Samples with Non-Detects						
	Ballona Creek @ Sawtelle Blvd	Malibu Creek @ Piuma Rd	Los Angeles River @ Wardlow	Coyote Creek @ Spring St	San Gabriel River	Dominguez Channel @ Artesia Blvd	Santa Clara River
1-2-4-Trichlorobenzene	88	88	88	88	88	89	88
1-2-Dichlorobenzene	88	88	88	88	88	89	88
1-2-Diphenylhydrazine	88	88	88	88	88	89	88
1-3-Dichlorobenzene	88	88	88	88	88	89	88
1-4-Dichlorobenzene	88	88	88	88	88	89	88
2-4-5-TP-SILVEX	88	88	88	88	88	89	88
2-4-6-trichlorophenol	88	88	86	87	80	89	88
2-4-D	88	88	88	88	88	89	88
2-4-dichlorophenol	88	88	88	88	88	89	88
2-4-dimethylphenol	88	88	88	88	88	89	88
2-4-dinitrophenol	88	88	88	88	88	89	88
2-4-Dinitrotoluene	88	88	88	88	88	89	88
2-6-Dinitrotoluene	88	88	88	88	88	89	88
2-Chloronaphthalene	88	88	88	88	88	89	88
2-Chlorophenol	88	88	88	88	88	89	88
2-nitrophenol	88	88	88	88	88	89	85
3-3-Dichlorobenzidine	88	88	88	88	88	89	88
4-6-Dinitro-2-methylphenol	88	88	86	87	88	87	88
4-Bromophenyl phenyl ether	88	88	88	88	88	89	88
4-chloro-3-methylphenol	88	88	88	88	88	89	88
4-Chlorophenyl phenyl ether	88	88	88	88	88	89	NA
4-nitrophenol	88	88	88	88	88	89	88
Acenaphthene	88	85	88	88	88	89	88
Acenaphthylene	88	89	88	88	88	89	88
Aldrin	88	88	88	88	88	89	88
alpha-BHC	88	88	88	88	88	89	88
Anthracene	88	89	88	88	88	89	88
Atrazine	88	88	88	88	88	89	88
Benzidine	88	88	88	88	88	89	88
Benzo(a)pyrene	88	89	88	88	88	89	88
beta-BHC	88	88	88	88	88	89	88
Bis(2-Chloroethoxy) methane	88	88	88	88	88	89	88
Butyl benzyl phthalate	87	86	88	88	86	87	NA

Parameter	Percent of Samples with Non-Detects						
	Ballona Creek @ Sawtelle Blvd	Malibu Creek @ Piuma Rd	Los Angeles River @ Wardlow	Coyote Creek @ Spring St	San. Gabriel River	Dominguez Channel @ Artesia Blvd	Santa Clara River
Chlorpyrifos	90	89	89	89	89	89	88
Chrysene	88	89	88	88	88	89	88
Cyanazine	88	88	88	88	88	89	88
Cyanide	NA	78	NA	NA	NA	NA	NA
delta-BHC	88	88	88	88	88	89	88
Diazinon	76	81	79	NA	77	NA	NA
Dibenzo(a-h)anthracene	88	89	88	88	88	89	88
Dieldrin	88	88	88	88	88	89	88
Diethyl phthalate	85	82	86	87	82	87	77
Dimethyl phthalate	88	88	86	88	84	89	88
Dissolved Aluminum	82	86	83	85	83	81	NA
Dissolved Beryllium	91	91	91	91	91	89	88
Dissolved Cadmium	90	NA	79	87	86	76	83
Dissolved Chromium +6	NA	91	80	NA	85	NA	83
Dissolved Lead	NA	83	NA	NA	NA	NA	NA
Dissolved Mercury	91	91	89	91	91	89	88
Dissolved Silver	91	91	91	91	89	89	88
Dissolved Thallium	91	91	91	91	91	89	88
Endosulfan sulfate	88	88	88	88	88	89	88
Endrin	88	88	88	88	88	89	88
Endrin aldehyde	88	88	88	88	88	89	88
Fluoranthene	87	85	86	87	88	89	85
Fluorene	88	89	88	88	88	89	88
gamma-BHC (lindane)	88	88	88	88	88	87	88
Glyphosate	88	88	88	90	88	89	88
Heptachlor	88	88	88	88	88	89	88
Heptachlor Epoxide	88	88	88	88	88	89	88
Hexachlorobenzene	88	88	88	88	88	89	88
Hexachlorobutadiene	88	88	88	88	88	89	88
Hexachloro-cyclopentadiene	88	88	88	88	88	89	88
Hexachloroethane	88	88	88	88	88	89	88
Indeno(1-2-3-c-d)pyrene	88	89	88	88	88	89	88
Isophorone	87	88	88	88	88	89	85
Malathion	88	88	88	88	88	89	88
Naphthalene	88	85	88	88	88	89	88

Parameter	Percent of Samples with Non-Detects						
	Ballona Creek @ Sawtelle Blvd	Malibu Creek @ Piuma Rd	Los Angeles River @ Wardlow	Coyote Creek @ Spring St	San Gabriel River	Dominguez Channel @ Artesia Blvd	Santa Clara River
Nitrite-N	NA	75	NA	NA	NA	NA	NA
Nitrobenzene	88	88	88	88	88	89	88
N-Nitroso-dimethyl amine	88	88	88	88	88	89	88
N-Nitroso-di-n-propyl amine	88	88	88	88	88	89	88
N-Nitroso-diphenyl amine	88	88	88	88	88	89	88
Pentachlorophenol	88	88	88	88	88	89	88
Phenanthrene	88	89	88	88	88	89	88
Phenol	88	88	88	88	88	89	88
Prometryn	85	88	88	88	88	89	88
Pyrene	87	89	86	87	88	89	85
Simazine	88	88	88	88	86	89	88
Toxaphene	88	88	88	88	88	89	88

LA County MS4 Permit Structure

The Los Angeles Regional Water Quality Control Board (Regional Board) has begun the process of updating the Los Angeles County Municipal Separate Storm Sewer System (MS4) NPDES Permit, which was last issued in 2001. The 2001 Permit regulates discharges of stormwater and non-stormwater from the MS4 to Waters of the State and U.S. The MS4 discharges from 84 cities, Los Angeles County, and Los Angeles County Flood Control District are regulated by the Regional Board under this single permit.

The Regional Board held a Kick-off Meeting with Permittees and stakeholders on May 25, 2011 to begin permit development. At the meeting, Regional Board staff discussed a number of alternative permit structures. (The PowerPoint presentation from the May 25th meeting can be downloaded from the Regional Board's website at http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/la_ms4/LAMS4PermitKickoffMeetingPresentation.pdf)

This survey is intended to solicit Permittees' preferences regarding permit structure and will be used by Regional Board staff, along with other information, in developing for Regional Board consideration the appropriate permit structure for regulating MS4 discharges within the Los Angeles County Flood Control District, Los Angeles County, and the incorporated cities therein.

Please respond to the questions below, indicating your city's preferences regarding permit structure and briefly explaining your rationale for preferring this structure.

PLEASE SUBMIT ONLY ONE RESPONSE PER PERMITTEE.

Responses are requested by June 24, 2011. For questions, please contact Mr. Ivar Ridgeway, Chief, Stormwater Permitting Unit, at (213) 620-2150.

*1. Which permit structure does your city prefer for an updated MS4 Permit?

- Single MS4 Permit for Los Angeles County
- Six watershed-based MS4 Permits using Regional Board Watershed Management Areas
- Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups
- Per 2006 Reports of Waste Discharge (ROWDs)
- Individual MS4 Permits for each Permittee
- Other (please specify)

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

LA County MS4 Permit Structure

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

- Watershed-based chapters per AB 2554 Watershed Authority Groups
- Watershed-based chapters per Regional Board Watershed Management Areas
- Individual permittee chapters
- Other (please specify)

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

- Incorporation of TMDL wasteload allocations into the permit
- New development/redevelopment permit provisions, including LID
- Monitoring program design
- Reporting program design
- Regulation of non-stormwater discharges to/from the MS4
- Other (please specify workshop topic(s))

*6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name:

Title:

City Department:

Address:

City:

State:

ZIP:

Country:

Email Address:

Phone Number:

LA County MS4 Permit Structure

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name:	<input type="text"/>
Title:	<input type="text"/>
Dept./Co.:	<input type="text"/>
Address:	<input type="text"/>
City:	<input type="text"/>
State:	<input type="text"/>
ZIP:	<input type="text"/>
Country:	<input type="text"/>
Email Address:	<input type="text"/>
Phone Number:	<input type="text"/>

LA County MS4 Permit Structure



1. Which permit structure does your city prefer for an updated MS4 Permit?

		Response Percent	Response Count
Single MS4 Permit for Los Angeles County		51.0%	26
Six watershed-based MS4 Permits using Regional Board Watershed Management Areas		13.7%	7
Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups		9.8%	5
Per 2006 Reports of Waste Discharge (ROWDs)		5.9%	3
Individual MS4 Permits for each Permittee		7.8%	4
Other (please specify)		21.6%	11
		answered question	51
		skipped question	0





2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

	Response Count
	14
answered question	14
skipped question	37




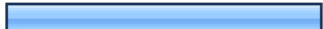


3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

	Response Count
	43
answered question	43
skipped question	8











4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

		Response Percent	Response Count
Watershed-based chapters per AB 2554 Watershed Authority Groups		37.5%	15
Watershed-based chapters per Regional Board Watershed Management Areas		32.5%	13
Individual permittee chapters		12.5%	5
Other (please specify)		30.0%	12
		answered question	40
		skipped question	11

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.










		Response Percent	Response Count
Incorporation of TMDL wasteload allocations into the permit		88.2%	45
New development/redevelopment permit provisions, including LID		54.9%	28
Monitoring program design		76.5%	39
Reporting program design		27.5%	14
Regulation of non-stormwater discharges to/from the MS4		43.1%	22
Other (please specify workshop topic(s))		15.7%	8
		answered question	51
		skipped question	0

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

		Response Percent	Response Count
Name:		100.0%	51
Title:		100.0%	51
City Department:		100.0%	51
Address:		100.0%	51
City:		100.0%	51
State:		100.0%	51
ZIP:		100.0%	51
Country:		100.0%	51
Email Address:		100.0%	51
Phone Number:		100.0%	51
answered question			51

skipped question 0

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

		Response Percent	Response Count
Name:		100.0%	48
Title:		100.0%	48
Dept./Co.:		91.7%	44
Address:		93.8%	45
City:		93.8%	45
State:		95.8%	46
ZIP:		93.8%	45
Country:		91.7%	44
Email Address:		97.9%	47

Phone Number:



97.9%

47

answered question

48

skipped question

3

LA County MS4 Permit Structure



Which permit structure does your city prefer for an updated MS4 Permit?

		Response Percent	Response Count
Single MS4 Permit for Los Angeles County		51.9%	27
Six watershed-based MS4 Permits using Regional Board Watershed Management Areas		13.5%	7
Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups		9.6%	5
Per 2006 Reports of Waste Discharge (ROWDs)		5.8%	3
Individual MS4 Permits for each Permittee		7.7%	4
Other (please specify)		21.2%	11
answered question			52
skipped question			0

Q1. Which permit structure does your city prefer for an updated MS4 Permit?

1	If a single MS4 permit for Los Angeles County is used, the City of Rancho Palos Verdes would like to incorporate the TMDL requirements as described below in response to question #3.	Jun 30, 2011 9:03 AM
2	If the single permit is not implemented, we would like a permit which would include the four cities on the Palos Verdes Peninsula - us, RPV, RHE, and RH. We have worked very well together on TMDLs and have a unique situation in the County with our rural development and limited commercial/industrial land use.	Jun 29, 2011 8:44 AM
3	We prefer a single permit for LA County in order to minimize costs associated with administering the permit, but if multiple permits are going to be issued, then our preferred structure is a Palos Verdes Peninsula group permit for the Cities of Rolling Hills, Rolling Hills Estates, Rancho Palos Verdes and Palos Verdes	Jun 28, 2011 1:48 PM

Q1. Which permit structure does your city prefer for an updated MS4 Permit?

	Estates.	
4	Single MS4 Permit for Los Angeles County (including cities and unincorporated County areas) but excluding the Los Angeles County Flood Control District. Preference is for a single Permit only if no permittee is held responsible for another permittee's discharges. Otherwise, preference is for an individual Permit for the unincorporated County areas, such as was issued to the City of Long Beach.	Jun 27, 2011 4:57 PM
5	Individual MS4 Permit for the Los Angeles County Flood Control District (LACFCD), per its November 2010 Report of Waste Discharge. No preference for other permittees.	Jun 27, 2011 4:22 PM
6	The city of Carson prefers a sub-watershed based group permit.	Jun 27, 2011 2:54 PM
7	Watershed-based Permit	Jun 27, 2011 11:47 AM
8	Group permit to include all South Bay Council of Governments (SBCOG) member cities (15 cities)	Jun 22, 2011 3:25 PM
9	Group Permit Based on Watershed Assignment	Jun 22, 2011 1:57 PM
10	A single LA County wide MS4 Permit that is watershed-based, i.e. nine watershed-based chapters in addition to all chapters for model programs, etc.. There will be general requirements (universal terms) for all cities and specific requirements (below the line terms) for each municipality based upon their location, or WQ conditions. It also provides flexibility for model programs to prioritize them in such way to take advantage of years of data and experience that we have collected and analyzed on them.	Jun 17, 2011 6:59 AM
11	The City of Torrance requests the Dominguez and South Santa Monica Bay watersheds from the AB 2554 be combined for a South Bay watershed based permit, because 9 out of 15 cities in the South Bay have areas in both those sub-watersheds.	Jun 16, 2011 2:26 PM

LA County MS4 Permit Structure



If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

	Response Count
	15
answered question	15
skipped question	37

Q1. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

1	N/A	Jul 11, 2011 3:30 PM
2	As a second option, the City of Rancho Palos Verdes would opt for a joint permit of the Palos Verdes Peninsula cities (Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, and Palos Verdes Estates).	Jun 30, 2011 9:03 AM
3	As stated above.	Jun 29, 2011 8:44 AM
4	As stated above, if multiple permits are going to be issued, then our preferred structure is a Palos Verdes Peninsula group permit for the Cities of Rolling Hills, Rolling Hills Estates, Rancho Palos Verdes and Palos Verdes Estates.	Jun 28, 2011 1:48 PM
5	In November 2010, the LACFCD submitted an ROWD as an application for an individual permit. This ROWD contains a description of the LACFCD's preferred permit structure.	Jun 27, 2011 4:22 PM
6	At this point in time, the cities of Inglewood, Lawndale, Lomita and Gardena have agreed to participate in a watershed/subwatershed based group permit with the city of Carson. Other cities in the subwatershed such as Hawthorne and Torrance would be welcomed participants.	Jun 27, 2011 2:54 PM
7	N/A	Jun 27, 2011 2:27 PM
8	Watershed-based Permit - WMA or WAG	Jun 27, 2011 11:47 AM
9	N/A.	Jun 24, 2011 10:08 AM
10	cities include: El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach, Torrance, Lawndale, Inglewood, Hawthorne, Gardena, Carson, Lomita, Rancho Palos Verde, Rancho Verde Estates, Rolling Hills, Rolling Hills Estates.	Jun 22, 2011 3:25 PM

Q1. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

11	Already specified above. We cannot identify the permittees at this time as they are in the process of obtaining City Council approval.	Jun 22, 2011 1:57 PM
12	NA	Jun 20, 2011 2:53 PM
13	N/A	Jun 20, 2011 2:52 PM
14	Please see above explanation.	Jun 17, 2011 6:59 AM
15	Our request is based on combining the South Santa Monica Bay and the Dominguez Channel watersheds from the AB 2554 Watershed Authority Groups. The cities include the following: El Segundo, Hawthorne, Gardena, Manhattan Beach, Hermosa Beach, portions of Los Angeles County, portions of City of Los Angeles, Redondo Beach, Torrance, Carson, Lomita, Lawndale, Palos Verdes Estates, Rolling Hills Estates, Rolling Hills and Rancho Palos Verdes	Jun 16, 2011 2:26 PM

LA County MS4 Permit Structure



Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

	Response Count
	44
answered question	44
skipped question	8

Q1. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

1	N/A	Jul 11, 2011 3:30 PM
2	<p>The City would be fine with an individual permit first, and a WMA based second. Individual permits would better address the individual characteristics of the permittee. Technically, when the first NPDES permits for MS4s were established in Region 4, the City of Malibu if not the entire WMA would have fallen under the Phase II criteria for combined population and total mileage of MS4, not to mention the entire area is in the range of 80% undeveloped land. As such, it is considerably different and less connected to the urban setting of the greater Los Angeles Region and would need slightly more tailored requirements for an effective implementation strategy. The City has effective relationships and collaborates well with other area permittees, but does not feel it is necessary to be linked to them. The City could still collaborate with its partners on a regional basis, but should not necessarily be required to. In light of the City's second preferred option, the subregions established by the WMAs best exemplify shared characteristics and regulatory requirements (such as TMDLs). In particular, "Malibu Creek and Rural Santa Monica Bay WMA has distinctly different topography, commercial/industrial uses levels, residential densities, and infrastructure/facilities than most of the other WMAs. Having more tailored permits may allow the Board staff to work more effectively and efficiently with permittees to achieve WQ goals and compliance.</p>	Jul 7, 2011 11:53 AM
3	<p>The City of Rancho Palos Verdes would prefer a consistent Los Angeles County permit. The City would like provisions in the permit to account for the unique geographical characteristics of the Palos Verdes Peninsula (upon which the City of Rancho Palos Verdes is located).</p>	Jun 30, 2011 9:03 AM
4	<p>The City of Rolling Hills Estates prefers a single permit for LA County, but if multiple permits are issued, then our second choice would be for a Palos Verdes Peninsula group permit for the cities of Rolling Hills Estates, Rolling Hills, Palos Verdes Estates and Rancho Palos Verdes.</p>	Jun 29, 2011 10:19 AM
5	<p>Having one permit minimizes costs for staff time and allows cities to spend our</p>	Jun 29, 2011 8:44 AM

Q1. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

	limited funding on implementation and not additional paperwork.	
6	Since the County is unwilling to be lead, the watershed approach would be most effective for Pomona.	Jun 28, 2011 3:11 PM
7	Rolling Hills is a very small strictly residential city which is, by design, a low impact development. A permit that is responsive to the unique characteristics of the City while minimizing administrative and reporting costs would allow the City to focus its limited resources in protecting water quality.	Jun 28, 2011 1:48 PM
8	A single permit with watershed "chapters" would still allow for economies of scale and uniformity of message for activities and programs that are best administered in a regional manner. For example, given economies of scale and coordination of message and effort, the public outreach component of the MS4 permit is best managed by a single entity at the regional level. Similarly, given the infrastructure and expertise of the LACFCD, monitoring should continue to be conducted by this entity to provide consistency. The LACFCD has expressed that it will continue to provide monitoring, but it may pass down costs to cities or watershed for more specific monitoring. Even under a single permit, the Regional Board envisions watershed "chapters" that contain permit components required to meet the specific needs of each watershed.	Jun 28, 2011 10:43 AM
9	The County of LA DPW/FCD has provided limited MS4P guidance, unless paid for their services. This makes a poor foundation for building a single Countywide permit as many cities will be unable to afford the needed support and there will be no mechanism to make the changes necessary to achieve water quality objectives, potentially leading to regional enforcement efforts or redistribution of resources among permittees. Like many cities, the City of Downey touches multiple watersheds and reaches within a single watershed. So watershed based permits would require the City to incorporate multiple potentially conflicting permits. Authority based permits, might be rational if funding was forthcoming. Unfortunately, we are looking at Spring of 2013, then likely litigation, then initiation of taxation, then distribution of resources, then project selection (assuming recent litigation allows regional BMPs, which is questionable). It appears questionable that the authorities will be funded during the term of this MS4 permit. In 2006 and recently, the City of Downey requested an individual permit, while cooperating/participating with fair regional monitoring efforts and studies to assess priority pollution sources and areas.	Jun 27, 2011 6:08 PM
10	Because County unincorporated areas exist in all watersheds, the County prefers a single permit over participating in multiple permits. The administration of multiple permits would impose an unreasonable and unnecessary burden on the County. If watershed-based permits or other type of multiple permits are proposed for the city permittees, the County prefers an individual permit for itself, similar to the City of Long Beach permit.	Jun 27, 2011 4:57 PM
11	To leverage limited resources, the City wishes to continue with the current Countywide/Regional permit structure, with new chapters to address subregional requirements based on the AB 2554 Watershed Groups which have been widely vetted and negotiated among permittees.	Jun 27, 2011 4:43 PM
12	The LACFCD is not a municipality but is a special district that requires its own individual and unique permit requirements. As a flood control agency, the LACFCD conveys stormwater runoff but has no land use jurisdiction over the sources of the stormwater runoff that enters its system.	Jun 27, 2011 4:22 PM

Q1. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

13	It considers choices previously made by other cities that submitted separate ROWDs but keeps the LACFCD as the principal permittee which is important in order to achieve Bacteria TMDLs. LACFCD owns and operates the major storm drains, flood control basins with large pumps as well as the low flow diversions and the way the system is operated and maintained has a significant impact on Bacteria TMDL compliance. In addition if LACFCD is going to collect and manage AB2554 storm water quality funds, it only makes sense that they be involved in the joint permit.	Jun 27, 2011 4:02 PM
14	We value LA County as the Principal Permittee and the benefits of their leadership and guidance. We understand that the County will manage the AB 2554 funds if approved by the voters. By keeping the County as Principal Permittee, we'll be able to maintain a level of consistency especially in the annual reporting process.	Jun 27, 2011 3:02 PM
15	The subwatershed based group permit provides the best opportunity to maximize coordination among a small group of cities and agencies that have the same TMDL responsibilities.	Jun 27, 2011 2:54 PM
16	Existing TMDL's have been developed on a watershed basis. Given that the permit will include provisions and incorporate TMDLs for all permittees to comply with combined with the Los Angeles County Flood Control District no longer being the principal permittee, it is best to issue watershed permits. However, provisions should be written in which an exceedance/violation of a watershed TMDL or permit requirement will not punish all permittees within that watershed, but rather the private party and/or permittee at fault (i.e., the need to compare monitoring data may be required to determine the location of the exceedance/violation).	Jun 27, 2011 2:27 PM
17	More localized management	Jun 27, 2011 11:47 AM
18	It honors the preferences of other cities who submitted separate ROWDs, and includes LACFCD as principal permittee whose participation is essential in meeting Bacteria TMDLs. The condition, maintenance and operation of major storm drains, flood control basins/sumps and low flow diversions are critical for Bacteria TMDL compliance. LACFCD participation in a joint permit is also important and logical if they will be collecting and managing AB2554 stormwater quality funds.	Jun 27, 2011 11:42 AM
19	If LACFCD is released as Principal Permittee, West Hollywood would prefer watershed-based permits. The City has a good working relationship with both the Santa Monica Bay watershed and the Ballona Creek Watershed jurisdictions and would be amenable to either group. West Hollywood would also be amenable to a Single MS4 Permit (with all agencies or per the 2006 ROWDS) if LACFCD remains principal permittee or based on an alternative lead agency arrangement.	Jun 27, 2011 11:29 AM
20	TO MINIMIZE THE CITY WORK	Jun 27, 2011 11:04 AM
21	Believe a single county-wide permit would be the most consistent and least administratively burdensome	Jun 27, 2011 8:08 AM
22	Considering our knowledge of the current permit, compared to the other options, we feel the Single MS4 Permit is the best format.	Jun 24, 2011 4:26 PM

Q1. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

23	The City would like to see LA County continue to function as principal permittee, particularly if their funding initiative is passed.	Jun 24, 2011 2:35 PM
24	We are the smallest city in LA County and up against the foothills, WAGs make more sense to our City, Council and residents when it comes to cleaner water.	Jun 24, 2011 11:06 AM
25	The City of Hidden Hills (City) believes the Single MS4 Permit for Los Angeles County is the best possible permit structure because it maintains existing and established structures and relationships developed over the last three permit terms. We support this structure because of the interconnected network of County storm drains and similarity of common development methods and practices. Like a number of other Los Angeles County cities, the City is located in two watersheds, the Los Angeles River Watershed and the Malibu Creek Watershed. Although less than 1% of the City is located within the Malibu Creek Watershed, the City must still develop and implement Permit required activities for both watersheds. The City is concerned that if the Single MS4 Permit is changed, the City could likely be responsible for: 1) two or more State NPDES Permit fees; 2) submittal of two or more annual reports; and 3) differing development standards for each watershed's Stormwater Quality Management Plan or "SQMP."	Jun 24, 2011 10:08 AM
26	Economy of scale and continuity of the permit that has been in effect since the 90's	Jun 24, 2011 8:43 AM
27	In Los Angeles County the large number of small Cities with limited staff make the common permit with a Principal Permittee the most efficient way to approach this effort. The large technical issues can be led by the Principal permittee with support from the cities. I understand that Los Angeles County Flood Control does not want to be the Principal Permittee and I think that their concerns can be addressed with a Permit Mandated Memorandum of Understanding that defines the Cities minimum support level for programs like Public Education, Monitoring and Annual Report coordination.	Jun 24, 2011 8:38 AM
28	Our City believes that it makes the most sense for the County to be the Principal Permittee and implementing all stormwater programs with the City possibly paying a fee to the County each year to finance the program. They have the expertise and the staff to implement such programs where many cities don't.	Jun 23, 2011 4:45 PM
29	Agencies will be focused because we have to meet the same goals and this would seem to be the best way to address TMDL issues.	Jun 23, 2011 3:44 PM
30	Implementation and resource focus has shifted towards TMDL planning and implementation which are watershed based.	Jun 23, 2011 3:33 PM
31	1. The SBCOG cities principally drain to two watersheds. Dominguez Channel and Santa Monica Bay. 2. Only small areas of two cities (Inglewood - Ballona Creek and Carson - LA River) drain to another waters. 3. Eight cities drain to both watersheds. 4. Only one city (Hermosa Beach) doesn't drain to Dominguez Channel watershed. 5. The SBCOG has an organizational and financing structure that could coordinate joint activities like PIPP and Monitoring. 6. A group permit could allow a more focused development of LID standards that meet local conditions. 7. The SBCOG cities have a history of working cooperatively together on many cross jurisdictional transportation issues which will reduce the learning curve for implementing the NPDES Permit. 8. The SBCOG provides an immediate framework for implements projects and programs that would be fund	Jun 22, 2011 3:25 PM

Q1. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

	via the LA Flood Control District Stormwater Quality Funding Initiative.	
32	To better manage TMDLs and to propose reasonable MS4 Permit requirements.	Jun 22, 2011 1:57 PM
33	The Watershed Approach may provide a more tailored permit that reflects the differences in watershed areas and the specific challenges in addressing TMDLs.	Jun 22, 2011 10:59 AM
34	Consistent with needs and requirements of our City within the Upper San Gabriel Valley Watershed and provides the ability of effective monitoring and ease of enforcement and effective management within a smaller group with similar interests.	Jun 21, 2011 4:13 PM
35	There were no issues in the previous years when there was a single permit for Los Angeles County, therefore, the City of Inglewood (City) prefers no changes to the permit structure. The City believes that the public education and outreach portion of the permit is more effective on a Countywide approach. In addition to the public education and outreach part of the permit, the City also believes the monitoring portion of the permit is more effective on a Countywide approach.	Jun 21, 2011 9:18 AM
36	We would prefer to maintain the County as the principle permit holder since the County has that role now.	Jun 20, 2011 2:53 PM
37	The City of Bell Gardens would like to see the County maintain its role as Principle Permittee for the new MS4 Permit.	Jun 20, 2011 2:52 PM
38	The nine Watershed Authority Group areas provide a permit at a local level without going all the way down to a permit per city. The Watershed Authority Groups will, hopefully, place cities together that are facing similar sources of storm water pollution and will be able to work on them from a logically based regional level.	Jun 20, 2011 2:50 PM
39	City has limited resources - a unified permit will allow permittees to collaborate on permit requirements and compliance issues.	Jun 20, 2011 12:00 PM
40	A County permit will maintain and ensure County-wide consistency in monitoring, reporting, and public education efforts, and will increase regional collaboration in BMP implementation and development.	Jun 20, 2011 10:30 AM
41	1. it is consistent with County funding initiative negotiated in AB2554. 2. it promotes watershed wide solutions (coordination, innovation, collaboration, and leveraging resources) to address WQ problems (which is badly needed). 3. It is the most cost effective manner to deal with stormwater runoff pollution. 4. It is consistent with most people sense of fairness that they are being treated equitably, because they are all under one permit with similar requirements and dissimilar provisions when warranted . 5. WQ pollution does not recognize jurisdictional boundaries, it is in the watershed and it ought to be dealt with on watershed wide basis (regional projects, local projects, and institutional measures). 6. it should also provide for model programs flexibility, we have years of data that would help guide many of these model programs the much needed priority that they deserve to improve WQ.	Jun 17, 2011 6:59 AM
42	This structure would allow the South Bay cities to utilize the South Bay Cities Council of Governments to be the AB 2554 Watershed Authority Group and the South Bay already has media outlets (Daily Breeze) and a	Jun 16, 2011 2:26 PM

Q1. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

southbaystormwaterprogram website to use for public outreach. Additionally, using the proposed AB 2554 watersheds would split 9 out of 15 cities.

43	Provide for cost sharing	Jun 16, 2011 1:55 PM
44	The County includes several drainage areas but collectively it is one jurisdiction. Splitting drainage areas into multiple permits may cause many problems.	Jun 16, 2011 1:50 PM

LA County MS4 Permit Structure



If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

		Response Percent	Response Count
Watershed-based chapters per AB 2554 Watershed Authority Groups		36.6%	15
Watershed-based chapters per Regional Board Watershed Management Areas		34.1%	14
Individual permittee chapters		12.2%	5
Other (please specify)		29.3%	12
answered question			41
skipped question			11

Q1. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

1	The city does not prefer a unified permit, but if that is the route taken, chapters should be based on WMA not AB 2554.	Jul 7, 2011 11:53 AM
2	A Palos Verdes Peninsula wide TMDL implementation chapter with separate Low Impact Development (LID) requirements. LID requirements will support TMDL activities and the unique geographical characteristics of the area justify separate LID and TMDL requirements.	Jun 30, 2011 9:03 AM
3	Our preference would be for a single permit for LA County with a separate chapter for both TMDL and Low Impact Development requirements for the Palos Verdes Peninsula cities listed in Question 3. This approach would support our joint TMDL monitoring and implementation planning efforts and address the unique geology, topography and development characteristics of the Peninsula.	Jun 29, 2011 10:19 AM
4	A peninsula group as we have done in the past with ourselves, RHE, RPV, and RH.	Jun 29, 2011 8:44 AM
5	If a single permit is issued for LA County, we would like a separate chapter to address both TMDL and Low Impact Development requirements for the Palos	Jun 28, 2011 1:48 PM

Q1. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

	Verdes Peninsula cities listed in Question 2. This approach would support our joint TMDL monitoring and implementation planning efforts and address the unique geology, topography and development characteristics of the Peninsula.	
6	It is our understanding that the Individual permittee chapters option entails a single permit containing a set of core requirements applicable to all permittees plus TMDL chapters specific to each permittee.	Jun 27, 2011 4:57 PM
7	Individual permit chapters for TMDL Implementation PLUS Low Impact Development which is an important tool for TMDL compliance and should be tailored to characteristics of the City and TMDL objectives. This also allows agencies who have already developed an LID ordinance to work within that model rather than starting over with a one-LID-fits-all-cities approach.	Jun 27, 2011 4:02 PM
8	N/A	Jun 27, 2011 2:27 PM
9	Individual permit chapters for TMDL Implementation PLUS Low Impact Development which is an essential tool for TMDL compliance and should be tailored to the characteristics of the City as well as TMDL objectives.	Jun 27, 2011 11:42 AM
10	This issue is of great concern. The city feels further discussions and workshops are necessary before this question can be answered definitively.	Jun 24, 2011 4:26 PM
11	Chapter including neighboring agencies (to be determined) located within the upper reach of the LA River	Jun 24, 2011 2:35 PM
12	Please note that this is only preferred if the funding is passed and if the funding is not passed than something completely different would need to take place as the City would not have the resources to implement these programs. Additionally, the WAGs wouldn't make sense without the funding being passed by voters.	Jun 23, 2011 4:45 PM

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

72.67.0.98

Response Started:

Tuesday, July 5, 2011 12:36:56 PM

Response Modified:

Thursday, July 7, 2011 11:53:04 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Six watershed-based MS4 Permits using Regional Board Watershed Management Areas

Individual MS4 Permits for each Permittee

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The City would be fine with an individual permit first, and a WMA based second. Individual permits would better address the individual characteristics of the permittee. Technically, when the first NPDES permits for MS4s were established in Region 4, the City of Malibu if not the entire WMA would have fallen under the Phase II criteria for combined population and total mileage of MS4, not to mention the entire area is in the range of 80% undeveloped land. As such, it is considerably different and less connected to the urban setting of the greater Los Angeles Region and would need slightly more tailored requirements for an effective implementation strategy. The City has effective relationships and collaborates well with other area permittees, but does not feel it is necessary to be linked to them. The City could still collaborate with its partners on a regional basis, but should not necessarily be required to. In light of the City's second preferred option, the subregions established by the WMAs best exemplify shared characteristics and regulatory requirements (such as TMDLs). In particular, "Malibu Creek and Rural Santa Monica Bay WMA has distinctly different topography, commercial/industrial uses levels, residential densities, and infrastructure/facilities than most of the other WMAs. Having more tailored permits may allow the Board staff to work more effectively and efficiently with permittees to achieve WQ goals and compliance.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

Other (please specify) - The city does not prefer a unified permit, but if that is the route taken, chapters should be based on WMA not AB 2554.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Reporting program design

Other (please specify workshop topic(s)) - An individual meeting to discuss Ocean Plan issues that effect Malibu specifically.

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Jennifer Voccola Brown

Title: - Sr. Environmental Programs Coordinator

City Department: - Environmental Sustainability

Address: - 23825 Stuart Ranch Rd

City: - Malibu

State: - CA

ZIP: - 90265

Country: - USA

Email Address: - jbrown@malibucity.org

Phone Number: - 310-456-2489 ext 275

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Vic Peterson

Title: - Environmental Sustainability Director

Dept./Co.: - Environmental Sustainability

Address: - 23825 Stuart Ranch Rd

City: - Malibu

State: - CA

ZIP: - 90265

Country: - USA

Email Address: - vpeterson@malibucity.org

Phone Number: - 310-456-2489

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Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
207.200.116.138**Response Started:**
Thursday, June 16, 2011 1:40:42 PM**Response Modified:**
Thursday, June 16, 2011 1:49:50 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The County includes several drainage areas but collectively it is one jurisdiction. Splitting drainage areas into multiple permits may cause many problems.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Monitoring program design

Reporting program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - WES LIND

Title: - CITY ENGINEER

City Department: - ENGINEERING/PUBLIC WORKS

Address: - 6550 MILES AVENUE

City: - HUNTINGTON PARK

State: - CA

ZIP: - 90255

Country: - USA

Email Address: - wrlindinc@aol.com

Phone Number: - 626-447-4274 x 210

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - ARLETTE LIND

Title: - ENGINEER

Dept./Co.: - ENGINEERING

Address: - 6550 MILES AVENUE

City: - HUNTINGTON PARK

State: - CA

ZIP: - 90255

Country: - USA

Email Address: - wrlindinc@aol.com

Phone Number: - 626-447-4274 x202

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

63.192.65.149

Response Started:

Thursday, June 16, 2011 1:49:33 PM

Response Modified:

Thursday, June 16, 2011 1:54:46 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Provide for cost sharing

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Vanessa Hevener

Title: - Environmental Services Officer

City Department: - Public Works Services Department

Address: - 11800 Goldring Rd

City: - Arcadia

State: - CA

ZIP: - 91066

Country: - US

Email Address: - vhevener@ci.arcadia.ca.us

Phone Number: - 626-305-5327

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Tom Tait

Title: - Public Works Services Director

Dept./Co.: - Public Works Services Department

Address: - 11800 Goldring Rd

City: - Arcadia

State: - CA

ZIP: - 91066

Country: - US

Email Address: - ttait@ci.arcadia.ca.us

Phone Number: - 626-305-1386

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

204.145.132.2

Response Started:

Thursday, June 16, 2011 12:00:53 PM

Response Modified:

Thursday, June 16, 2011 2:25:54 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Other (please specify) - The City of Torrance requests the Dominguez and South Santa Monica Bay watersheds from the AB 2554 be combined for a South Bay watershed based permit, because 9 out of 15 cities in the South Bay have areas in both those sub-watersheds.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

Our request is based on combining the South Santa Monica Bay and the Dominguez Channel watersheds from the AB 2554 Watershed Authority Groups. The cities include the following: El Segundo, Hawthorne, Gardena, Manhattan Beach, Hermosa Beach, portions of Los Angeles County, portions of City of Los Angeles, Redondo Beach, Torrance, Carson, Lomita, Lawndale, Palos Verdes Estates, Rolling Hills Estates, Rolling Hills and Rancho Palos Verdes

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

This structure would allow the South Bay cities to utilize the South Bay Cities Council of Governments to be the AB 2554 Watershed Authority Group and the South Bay already has media outlets (Daily Breeze) and a southbaystormwaterprogram website to use for public outreach. Additionally, using the proposed AB 2554 watersheds would split 9 out of 15 cities.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - John Dettle

Title: - Engineering Manager

City Department: - Public Works Department

Address: - 20500 Madrona Avenue

City: - Torrance

State: - CA

ZIP: - 90503

Country: - USA

Email Address: - jdettle@torranceca.gov

Phone Number: - 310 618-3059

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Rob Beste

Title: - Public Works Director

Dept./Co.: - Public Works

Address: - 20500 Madrona Avenue

City: - Torrance

State: - CA

ZIP: - 90503

Country: - USA

Email Address: - rbeste@torranceca.gov

Phone Number: - 310 618 6258

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 4 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

207.178.221.178

Response Started:

Thursday, June 16, 2011 3:34:38 PM

Response Modified:

Thursday, June 16, 2011 3:39:43 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Six watershed-based MS4 Permits using Regional Board Watershed Management Areas

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

New development/redevelopment permit provisions, including LID

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - ALEX FARASSATI

Title: - ENV. SERVICES MANAGER

City Department: - PUBLIC WORKS DEPT

Address: - 100 CIVIC CENTER WAY

City: - CALABASAS

State: - CA

ZIP: - 91367

Country: - LOS ANGELES

Email Address: - AFARASSATI@CITYOFCALABASAS.COM

Phone Number: - 818-224-1680

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - DANIEL PANKAU

Title: - ENV. SERVICES ASSISTANT

Dept./Co.: - CITY OF CALABASAS PUBLIC WORKS DEPT

Address: - 100 CIVIC CENTER WAY

City: - CALABASAS

State: - CA

ZIP: - 91367

Country: - LOS ANGELES

Email Address: - DPANKAU@CITYOFCALABASAS.COM

Phone Number: - 818-224-1682

Design Survey

Collect Responses

Analyze Results

View Summary

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Default Report

Displaying 5 of 51 respondents

Response Type:
Normal Response

Collector:
LA Regional Board Stormwater Unit
(Web Link)

Custom Value:
empty

IP Address:
161.149.102.185

Response Started:
Friday, June 17, 2011 6:29:14 AM

Response Modified:
Friday, June 17, 2011 6:59:27 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Other (please specify) - A single LA County wide MS4 Permit that is watershed-based, i.e. nine watershed-based chapters in addition to all chapters for model programs, etc.. There will be general requirements (universal terms) for all cities and specific requirements (below the line terms) for each municipality based upon their location, or WQ conditions. It also provides flexibility for model programs to prioritize them in such way to take advantage of years of data and experience that we have collected and analyzed on them.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

Please see above explanation.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

1. it is consistent with County funding initiative negotiated in AB2554. 2. it promotes watershed wide solutions (coordination, innovation, collaboration, and leveraging resources) to address WQ problems (which is badly needed). 3. It is the most cost effective manner to deal with stormwater runoff pollution. 4. It is consistent with most people sense of fairness that they are being treated equitably, because they are all under one permit with similar requirements and dissimilar provisions when warranted. 5. WQ pollution does not recognize jurisdictional boundaries, it is in the watershed and it ought to be dealt with on watershed wide basis (regional projects, local projects, and institutional measures). 6. it should also provide for model programs flexibility, we have years of data that would help guide many of these model programs the much needed priority that they deserve to improve WQ.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

Other (please specify workshop topic(s)) - Reporting templates need to be created (streamedlined) so meaningful data can be extracted and analyzed on watershed wide basis. non-stormwater discharges are also important to be identified and accounted for planning an dimplementation purposes.

6. Please list the City's primary contact for continued communication regarding the Los Angeles County

MS4 permit development.

Name: - Shahram Kharaghani

Title: - Stormwater Program Manager

City Department: - Bureau of Sanitation

Address: - 1149 S. Broadway Street

City: - Los Angeles

State: - CA

ZIP: - 90015

Country: - Los Angeles

Email Address: - shahram.kharaghna@lacity.org

Phone Number: - 213-485-0587

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Robert Vega

Title: - Assistant Program Manager

Dept./Co.: - Bureau of Sanitation

Address: - 1149 S. Broadway Street

City: - Los Angeles

State: - CA

ZIP: - 90015

Country: - Los Angeles

Email Address: - robert.vega@lacity.org

Phone Number: - 213-485-3991

Design Survey

Collect Responses

Analyze Results

View Summary

Browse Responses

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Default Report

Displaying 6 of 51 respondents

Response Type:
Normal ResponseCollector:
LA Regional Board Stormwater Unit
(Web Link)Custom Value:
*empty*IP Address:
66.146.50.210Response Started:
Monday, June 20, 2011 10:17:53 AMResponse Modified:
Monday, June 20, 2011 10:29:37 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

A County permit will maintain and ensure County-wide consistency in monitoring, reporting, and public education efforts, and will increase regional collaboration in BMP implementation and development.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Alicia Jensen

Title: - Senior Management Analyst

City Department: - Community Services

Address: - P.O. Box 682

City: - Walnut

State: - CA

ZIP: - 91788-0682

Country: - USA

Email Address: - ajensen@ci.walnut.ca.us

Phone Number: - 909-598-5605 x222

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

No Response

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 7 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

67.115.254.9

Response Started:

Monday, June 20, 2011 11:56:08 AM

Response Modified:

Monday, June 20, 2011 11:59:55 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

City has limited resources - a unified permit will allow permittees to collaborate on permit requirements and compliance issues.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Reporting program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Claudine Meeker

Title: - Deputy Director of Utilities

City Department: - City of Alhambra Utilities

Address: - 111 South First Street

City: - Alhambra

State: - CA

ZIP: - 91801

Country: - United States

Email Address: - cmeeker@cityofalhambra.org

Phone Number: - (626) 570-5080

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - David Dolphin

Title: - Environmental Compliance Spec.

Dept./Co.: - Utilities Department

Address: - 111 South First Street

City: - Alhambra

State: - CA

ZIP: - 91801

Country: - United States

Email Address: - ddolphin@cityofalhambra.org

Phone Number: - (626) 300-1571

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 8 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
71.106.154.15**Response Started:**
Monday, June 20, 2011 2:45:06 PM**Response Modified:**
Monday, June 20, 2011 2:50:21 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

The nine Watershed Authority Group areas provide a permit at a local level without going all the way down to a permit per city. The Watershed Authority Groups will, hopefully, place cities together that are facing similar sources of storm water pollution and will be able to work on them from a logically based regional level.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?**No Response****5. Please select the top 3 issues that your city would like to have a workshop on during permit development.**

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Cindy Collins

Title: - Assistant City Manager

City Department: - Administration

Address: - 2200 Huntington Drive

City: - San Marino

State: - CA

ZIP: - 91108

Country: - USA

Email Address: - ccollins@cityofsanmarino.org

Phone Number: - 626-300-0700

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Kevin Sales

Title: - Consultant

Dept./Co.: - KJServices Environmental Consulting

Address: - 9020 Hornby Ave.

City: - Whittier

State: - CA

ZIP: - 90603

Country: - USA

Email Address: - kevin@kjservices.net

Phone Number: - 562-944-4766

Design Survey

Collect Responses

Analyze Results

View Summary

Browse Responses

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Default Report

Displaying 9 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
67.52.124.2**Response Started:**
Monday, June 20, 2011 2:47:55 PM**Response Modified:**
Monday, June 20, 2011 2:52:25 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

N/A

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The City of Bell Gardens would like to see the County maintain its role as Principle Permittee for the new MS4 Permit.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - John Oropeza

Title: - Director of Public Works

City Department: - Public Works

Address: - 8327 Garfield Ave.

City: - Bell Gardens

State: - CA

ZIP: - 90201

Country: - USA

Email Address: - joropeza@Bellgardens.org

Phone Number: - 562-806-7770

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Cory Roberts

Title: - NPDES Consultant

Dept./Co.: - Public Works

Address: - 1815 E. Heim Ave. Suite 100

City: - Orange

State: - CA

ZIP: - 92865

Country: - USA

Email Address: - croberts@aaeinc.com

Phone Number: - 714-940-0100 x.5039

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 10 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

65.208.157.67

Response Started:

Monday, June 20, 2011 2:11:12 PM

Response Modified:

Monday, June 20, 2011 2:53:21 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

NA

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

We would prefer to maintain the County as the principle permit holder since the County has that role now.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Samuel T Kouri

Title: - Deputy City Engineer

City Department: - Engineering Division

Address: - 1600 w Beverly Bl

City: - montebello

State: - CA

ZIP: - 90640

Country: - USA

Email Address: - skouri@cityofmontebello.com

Phone Number: - 3238871460

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Cory Roberts

Title: - Program Administrator

Dept./Co.: - Consultant

Address: - 1815 E Heim Av

City: - Orange

State: - CA

ZIP: - 92865

Country: - USA

Email Address: - croberts@infeng.co

Phone Number: - 7149400100 X5039

Design Survey

Collect Responses

Analyze Results

View Summary

Browse Responses

Filter Responses

Crosstab Responses

Download Responses

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Default Report

Displaying 11 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

75.49.87.211

Response Started:

Tuesday, June 21, 2011 9:09:52 AM

Response Modified:

Tuesday, June 21, 2011 9:18:12 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

There were no issues in the previous years when there was a single permit for Los Angeles County, therefore, the City of Inglewood (City) prefers no changes to the permit structure. The City believes that the public education and outreach portion of the permit is more effective on a Countywide approach. In addition to the public education and outreach part of the permit, the City also believes the monitoring portion of the permit is more effective on a Countywide approach.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Individual permittee chapters

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Barmeshwar Rai

Title: - Principal Engineer Water Resources

City Department: - Public Works

Address: - 1 W Manchester Blvd, 3rd Floor

City: - Inglewood

State: - CA

ZIP: - 90312

Country: - USA

Email Address: - brai@cityofinglewood.org

Phone Number: - 310-412-5333

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Lauren Amimoto

Title: - Senior Admin. Analyst

Dept./Co.: - Public Works

Address: - 1 W Manchester Blvd, 3rd Floor

City: - Inglewood

State: - CA

ZIP: - 90312

Country: - USA

Email Address: - lamimoto@cityofinglewood.org

Phone Number: - 310-412-5192

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 12 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

173.200.81.28

Response Started:

Tuesday, June 21, 2011 4:04:54 PM

Response Modified:

Tuesday, June 21, 2011 4:13:07 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Consistent with needs and requirements of our City within the Upper San Gabriel Valley Watershed and provides the ability of effective monitoring and ease of enforcement and effective management within a smaller group with similar interests.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Lisa Bugrova

Title: - Environmental Coordinator

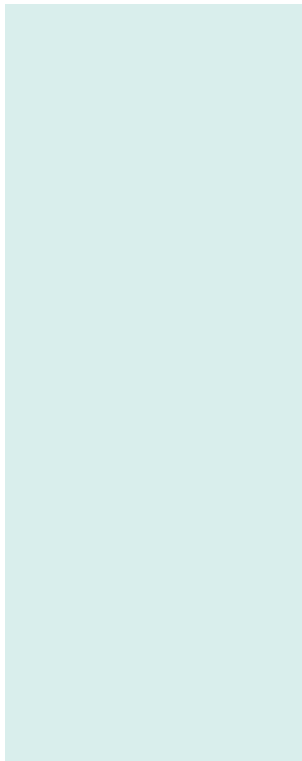
City Department: - Public Works

Address: - 245 E. Bonita Ave

City: - San Dimas

State: - CA

ZIP: - 91773



Country: - United States

Email Address: - lmonreal@ci.san-dimas.ca.us

Phone Number: - 909-394-6244

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Krishna Patel

Title: - Director

Dept./Co.: - Public Works

Address: - 245 E. Bonita Ave

City: - San Dimas

State: - CA

ZIP: - 91750

Country: - United States

Email Address: - kpatel@ci.san-dimas.ca.us

Phone Number: - 909-394-6245

Design Survey

Collect Responses

Analyze Results

View Summary

Browse Responses

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Crosstab Responses

Download Responses

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Default Report

Displaying 13 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:***empty***IP Address:**

66.214.254.154

Response Started:

Wednesday, June 22, 2011 10:42:29 AM

Response Modified:

Wednesday, June 22, 2011 10:58:56 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Six watershed-based MS4 Permits using Regional Board Watershed Management Areas

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The Watershed Approach may provide a more tailored permit that reflects the differences in watershed areas and the specific challenges in addressing TMDLs.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Gina Nila

Title: - Environmental Services Manager

City Department: - Community Development

Address: - 2535 Commerce Way

City: - Commerce

State: - CA

ZIP: - 90040

Country: - Los Angeles

Email Address: - ginan@ci.commerce.ca.us

Phone Number: - 323-722-4805, ext. 2839

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Alex Hamilton

Title: - Assistant Director of Community Development

Dept./Co.: - Community Development

Address: - 2535 Commerce Way

City: - Commerce

State: - CA

ZIP: - 90040

Country: - Los Angeles

Email Address: - alexh@ci.commerce.ca.us

Phone Number: - 323-722-4805

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 14 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

69.231.197.5

Response Started:

Wednesday, June 22, 2011 1:37:16 PM

Response Modified:

Wednesday, June 22, 2011 1:57:08 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Other (please specify) - Group Permit Based on Watershed Assignment

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

Already specified above. We cannot identify the permittees at this time as they are in the process of obtaining City Council approval.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

To better manage TMDLs and to propose reasonable MS4 Permit requirements.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?**No Response****5. Please select the top 3 issues that your city would like to have a workshop on during permit development.**

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Ray Tahir

Title: - Consultant

City Department: - None

Address: - 106 South Mentor Avenue - 125

City: - Pasadena

State: - CA

ZIP: - 91106

Country: - USA

Email Address: - rtahir@tecsenv.com

Phone Number: - 626.396.9424

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Mitch Lansdell

Title: - City Manager

Dept./Co.: - City Administration

Address: - 1700 West 162nd St.

City: - Gardena

State: - CA

ZIP: - 90247

Country: - USA

Email Address: - mlansdell@ci.gardena.ca.us

Phone Number: - (310) 217-9500

Design Survey

Collect Responses

Analyze Results

View Summary

Browse Responses

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Crosstab Responses

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Default Report

Displaying 15 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

173.196.3.178

Response Started:

Wednesday, June 22, 2011 3:03:58 PM

Response Modified:

Wednesday, June 22, 2011 3:25:18 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Other (please specify) - Group permit to include all South Bay Council of Governments (SBCOG) member cities (15 cities)

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

cities include: El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach, Torrance, Lawndale, Inglewood, Hawthorne, Gardena, Carson, Lomita, Rancho Palos Verde, Rancho Verde Estates, Rolling Hills, Rolling Hills Estates.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

1. The SBCOG cities principally drain to two watersheds. Dominguez Channel and Santa Monica Bay. 2. Only small areas of two cities (Inglewood - Ballona Creek and Carson - LA River) drain to another waters. 3. Eight cities drain to both watersheds. 4. Only one city (Hermosa Beach) doesn't drain to Dominguez Channel watershed. 5. The SBCOG has an organizational and financing structure that could coordinate joint activities like PIPP and Monitoring. 6. A group permit could allow a more focused development of LID standards that meet local conditions. 7. The SBCOG cities have a history of working cooperatively together on many cross jurisdictional transportation issues which will reduce the learning curve for implementing the NPDES Permit. 8. The SBCOG provides an immediate framework for implementing projects and programs that would be funded via the LA Flood Control District Stormwater Quality Funding Initiative.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Michael Shay

Title: - Principal Civil Engineer

City Department: - Engineering & Building Services

Address: - 415 Diamond Street

City: - Redondo Beach

State: - CA

ZIP: - 90277

Country: - USA

Email Address: - mike.shay@redondo.org

Phone Number: - (310) 318-0661 x2455

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Steve Huang

Title: - Director

Dept./Co.: - Engineering & Building Service

Address: - 415 Diamond Street

City: - Redondo Beach

State: - CA

ZIP: - 90277

Country: - USA

Email Address: - steve.huang@redondo.org

Phone Number: - (310) 318-0661 x2431

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 16 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
216.165.238.12**Response Started:**
Thursday, June 23, 2011 3:23:36 PM**Response Modified:**
Thursday, June 23, 2011 3:33:17 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Six watershed-based MS4 Permits using Regional Board Watershed Management Areas

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

Implementation and resource focus has shifted towards TMDL planning and implementation which are watershed based.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Heather Maloney

Title: - Senior Management Analyst

City Department: - Public Works

Address: - 600 S. Mountain Ave.

City: - Monrovia

State: - CA

ZIP: - 91016

Country: - USA

Email Address: - hmaloney@ci.monrovia.ca.us

Phone Number: - 626-9329-5577

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Ron Bow

Title: - Director of Public Works

Dept./Co.: - Public Works

Address: - 600 S. Mountain Ave.

City: - Monrovia

State: - CA

ZIP: - 91016

Country: - USA

Email Address: - rbow@ci.monrovia.ca.us

Phone Number: - 626-932-5575

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 17 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
208.68.8.130**Response Started:**
Thursday, June 23, 2011 3:35:52 PM**Response Modified:**
Thursday, June 23, 2011 3:43:35 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Six watershed-based MS4 Permits using Regional Board Watershed Management Areas

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

Agencies will be focused because we have to meet the same goals and this would seem to be the best way to address TMDL issues.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?**No Response****5. Please select the top 3 issues that your city would like to have a workshop on during permit development.**

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - KEVIN WILSON

Title: - DIRECTOR OF COMMUNITY SERVICES & WATER

City Department: - COMMUNITY SERVICES & WATER

Address: - 4305 SANTA FE AVENUE

City: - VERNON

State: - CA

ZIP: - 90058

Country: - USA

Email Address: - kwilson@ci.vernon.ca.us

Phone Number: - 323-583-8811 x245

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - CLAUDIA ARELLANO

Title: - PROJECT ENGINEER

Dept./Co.: - COMMUNITY SERVICES & WATER DEPARTMENT/CITY OF VERNON

Address: - 4305 SANTA FE AVENUE

City: - VERNON

State: - CA

ZIP: - 90058

Country: - USA

Email Address: - carellano@ci.vernon.ca.us

Phone Number: - 323-583-8811 x258

Design Survey

Collect Responses

Analyze Results

View Summary

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Default Report

Displaying 18 of 51 respondents

Response Type:
Normal Response

Collector:
LA Regional Board Stormwater Unit
(Web Link)

Custom Value:
empty

IP Address:
65.217.185.98

Response Started:
Thursday, June 23, 2011 4:37:46 PM

Response Modified:
Thursday, June 23, 2011 4:44:33 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Our City believes that it makes the most sense for the County to be the Principal Permittee and implementing all stormwater programs with the City possibly paying a fee to the County each year to finance the program. They have the expertise and the staff to implement such programs where many cities don't.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

Other (please specify) - Please note that this is only preferred if the funding is passed and if the funding is not passed than something completely different would need to take place as the City would not have the resources to implement these programs. Additionally, the WAGs wouldn't make sense without the funding being passed by voters.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - JR Ranells

Title: - Sr. Management Analyst

City Department: - Public Works

Address: - 3660 D Street

City: - La Verne

State: - CA

ZIP: - 91750

Country: - US

Email Address: - jranells@ci.la-verne.ca.us

Phone Number: - (909) 596-8741

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Daniel W. Keesey

Title: - Director of Public Works

Dept./Co.: - Public Works

Address: - 3660 D Street

City: - La Verne

State: - CA

ZIP: - 91750

Country: - U.S.

Email Address: - dkeesey@ci.la-verne.ca.us

Phone Number: - (909) 596-8741

Design Survey

Collect Responses

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Default Report

Displaying 19 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

206.117.123.162

Response Started:

Friday, June 24, 2011 8:04:45 AM

Response Modified:

Friday, June 24, 2011 8:08:45 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Maurice Oillataguerre

Title: - Sr. Environmental Program Specialist

City Department: - Public Works

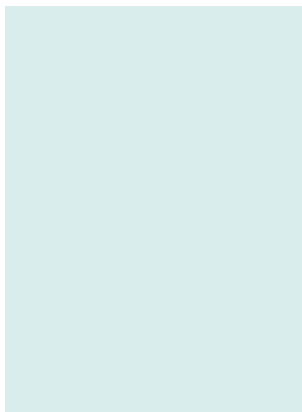
Address: - 633 E Broadway, Room 205

City: - Glendale

State: - CA

ZIP: - 91206

Country: - USA



Email Address: - moillataguerre@ci.glendale.ca.us

Phone Number: - (818) 937-8219

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

No Response

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 20 of 51 respondents

Response Type:
Normal Response

Collector:
LA Regional Board Stormwater Unit
(Web Link)

Custom Value:
empty

IP Address:
209.78.104.222

Response Started:
Friday, June 24, 2011 8:26:29 AM

Response Modified:
Friday, June 24, 2011 8:37:47 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

In Los Angeles County the large number of small Cities with limited staff make the common permit with a Principal Permittee the most efficient way to approach this effort. The large technical issues can be led by the Principal permittee with support from the cities. I understand that Los Angeles County Flood Control does not want to be the Principal Permittee and I think that their concerns can be addressed with a Permit Mandated Memorandum of Understanding that defines the Cities minimum support level for programs like Public Education, Monitoring and Annual Report coordination.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Edward Hitti

Title: - Director of Public Works

City Department: - Public Works Department

Address: - 1327 Foothill Boulevard

City: - La Canada Flintridge

State: - CA

ZIP: - 91011

Country: - USA

Email Address: - ehitti@lcf.ca.gov

Phone Number: - 818-790-8882

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Ying Kwan

Title: - City Engineer

Dept./Co.: - Public Works Department

Address: - 1327 Foothill Blvd

City: - La Canada Flintridge

State: - CA

ZIP: - 91011

Country: - USA

Email Address: - Kwan, Ying [ykwan@lcf.ca.gov]

Phone Number: - 818-790-8882

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 21 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:***empty***IP Address:**

24.43.117.242

Response Started:

Friday, June 24, 2011 8:32:42 AM

Response Modified:

Friday, June 24, 2011 8:40:43 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Individual permittee chapters

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Monitoring program design

Reporting program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Shin Furukawa

Title: - Deputy Public Works Director

City Department: - Public Works

Address: - 1414 Mission St.

City: - South Pasadena

State: - CA

ZIP: - 91030

Country: - USA

Email Address: - sfurukawa@ci.south-pasadena.ca.us

Phone Number: - 626-403-7240

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

No Response

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 22 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
69.31.120.253**Response Started:**
Friday, June 24, 2011 8:26:58 AM**Response Modified:**
Friday, June 24, 2011 8:43:09 AM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

Economy of scale and continuity of the permit that has been in effect since the 90's

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

New development/redevelopment permit provisions, including LID

Monitoring program design

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Neal Shapiro

Title: - Watershed Management Program Coordinator

City Department: - City Manager's Office

Address: - 200 Santa Monica Pier

City: - Santa Monica

State: - CA

ZIP: - 90401

Country: - USA

Email Address: - neal.shapiro@smgov.net

Phone Number: - (310) 458-8223

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Rick Valte

Title: - Watershed Program Manager

Dept./Co.: - Public Works

Address: - 1437 4th Street, Suite 300

City: - Santa Monica

State: - CA

ZIP: - 90401

Country: - USA

Email Address: - rick.valte@smgov.net

Phone Number: - (310) 458-8234

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 23 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

173.60.156.211

Response Started:

Friday, June 24, 2011 10:01:23 AM

Response Modified:

Friday, June 24, 2011 10:07:30 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

N/A.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The City of Hidden Hills (City) believes the Single MS4 Permit for Los Angeles County is the best possible permit structure because it maintains existing and established structures and relationships developed over the last three permit terms. We support this structure because of the interconnected network of County storm drains and similarity of common development methods and practices. Like a number of other Los Angeles County cities, the City is located in two watersheds, the Los Angeles River Watershed and the Malibu Creek Watershed. Although less than 1% of the City is located within the Malibu Creek Watershed, the City must still develop and implement Permit required activities for both watersheds. The City is concerned that if the Single MS4 Permit is changed, the City could likely be responsible for: 1) two or more State NPDES Permit fees; 2) submittal of two or more annual reports; and 3) differing development standards for each watershed's Stormwater Quality Management Plan or "SQMP."

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Cherie L. Paglia

Title: - City Manager

City Department: - City of Hidden Hills

Address: - 6165 Spring Valley Road

City: - Hidden Hills

State: - CA

ZIP: - 91302

Country: - United States of America

Email Address: - Citymanager@hiddenhillscity.org

Phone Number: - (818) 888-9281

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Kevin Powers

Title: - Environmental Compliance Coordinator

Dept./Co.: - City of Hidden Hills

Address: - 6165 Spring Valley Road

City: - Hidden Hills

State: - CA

ZIP: - 91302

Country: - United States of America

Email Address: - kevinpowers@caaprofessionals.com

Phone Number: - (310) 864-6201

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 24 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
66.80.180.218**Response Started:**
Friday, June 24, 2011 10:36:40 AM**Response Modified:**
Friday, June 24, 2011 11:05:50 AM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

We are the smallest city in LA County and up against the foothills, WAGs make more sense to our City, Council and residents when it comes to cleaner water.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Michelle Keith

Title: - City Manager

City Department: - Administration

Address: - 600 Winston Avenue

City: - Bradbury

State: - CA

ZIP: - 91008

Country: - USA

Email Address: - mkeith@citybradbury.org

Phone Number: - 626-358-3218

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - David Gilbertson

Title: - Deputy Engineer

Address: - 398 Lemon Creek Drive Ste. E

City: - Walnut

State: - CA

ZIP: - 91789-2649

Country: - Usa

Email Address: - dgilbertson@rkagroup.com

Phone Number: - 909-594-9702

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 25 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
204.89.11.113**Response Started:**
Friday, June 24, 2011 2:24:16 PM**Response Modified:**
Friday, June 24, 2011 2:34:43 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

The City would like to see LA County continue to function as principal permittee, particularly if their funding initiative is passed.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - Chapter including neighboring agencies (to be determined) located within the upper reach of the LA River

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Daniel Rix

Title: - City Engineer

City Department: - Public Works

Address: - PO Box 7115

City: - Pasadena

State: - CA

ZIP: - 91109-7215

Country: - USA

Email Address: - drix@cityofpasadena.net

Phone Number: - 626-744-4267

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Stephen Walker

Title: - Principal Engineer

Dept./Co.: - Public Works

Address: - PO Box 7115

City: - Pasadena

State: - CA

ZIP: - 91109-7215

Country: - USA

Email Address: - swalker@cityofpasadena.net

Phone Number: - 626-744-4271

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 26 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

64.183.65.122

Response Started:

Friday, June 24, 2011 3:40:57 PM

Response Modified:

Friday, June 24, 2011 3:54:50 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - James Carlson

Title: - Management Analyst

City Department: - Public Works

Address: - 232 W. Sierra Madre Blvd.

City: - Sierra Madre

State: - CA

ZIP: - 91024

Country: - USA

Email Address: - jcarlson@cityofsierramadre.com

Phone Number: - 6263557135

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Bruce Inman

Title: - Director of Public Works

Dept./Co.: - Public Works

Address: - 232 W. Sierra Madre Bl.

City: - Sierra Madre

State: - CA

ZIP: - 91024

Country: - USA

Email Address: - binman@cityofsierramadre.com

Phone Number: - 6263555839

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 27 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
74.62.158.132**Response Started:**
Friday, June 24, 2011 4:08:52 PM**Response Modified:**
Friday, June 24, 2011 4:25:55 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

Considering our knowledge of the current permit, compared to the otehr options, we feel the Single MS4 Permit is the best format.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - This issue is of great concern. The city feels further discussions and workshops are necessary before this question can be answered definitively.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Travis Lange

Title: - Environmental Services Manager

City Department: - Public Works

Address: - 23920 Valencia Blvd. Ste 300

City: - Santa Clarita

State: - CA

ZIP: - 91355

Country: - USA

Email Address: - tlange@santa-clarita.com

Phone Number: - 661 255-4337

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Oliver Cramer

Title: - Environmentla Analyst

Dept./Co.: - Public Works

Address: - 23920 Valencia Blvd. Ste 300

City: - Santa Clarita

State: - CA

ZIP: - 91355

Country: - USA

Email Address: - ocramer@santa-clarita.com

Phone Number: - 661 255-4904

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 28 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
207.238.115.28**Response Started:**
Sunday, June 26, 2011 10:49:31 AM**Response Modified:**
Sunday, June 26, 2011 10:59:14 AM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Individual MS4 Permits for each Permittee

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Steve Myrter

Title: - Public Works Director

City Department: - Public Works Department/City of Signal Hill

Address: - 2175 Cherry Avenue

City: - Signal Hill

State: - CA

ZIP: - 90755-3799

Country: - USA

Email Address: - smyrter@cityofsignalhill.org

Phone Number: - (562) 989-7356

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Ken Farfsing

Title: - City Manager

Dept./Co.: - City Manager's office / City of Signal Hill

Address: - 2175 Cherry Avenue

City: - Signal Hill

State: - CA

ZIP: - 90755-3799

Country: - USA

Email Address: - kfarfsing@cityofsignalhill.org

Phone Number: - (562) 989-7300

Design Survey

Collect Responses

Analyze Results

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Default Report

Displaying 29 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
64.166.122.2**Response Started:**
Monday, June 27, 2011 7:50:45 AM**Response Modified:**
Monday, June 27, 2011 7:55:40 AM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - James Enriquez

Title: - Director of Public Works

City Department: - Public Works

Address: - 11333 Valley Boulevard

City: - El Monte

State: - CA

ZIP: - 91731

Country: - USA

Email Address: - jenriquez@lemonteca.gov

Phone Number: - 626-580-2058

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Cesar Roldan

Title: - Senior Engineer

Dept./Co.: - Public Works

Address: - 11333 Valley Boulevard

City: - El Monte

State: - CA

ZIP: - 91731

Country: - USA

Email Address: - croidan@elmonteca.gov

Phone Number: - 626-580-2087

Design Survey

Collect Responses

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Default Report

Displaying 30 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

173.200.85.38

Response Started:

Monday, June 27, 2011 7:56:49 AM

Response Modified:

Monday, June 27, 2011 8:08:11 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Believe a single county-wide permit would be the most consistent and least administratively burdensome

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Mohammad Mostahkami

Title: - Director of Public Works/City Engr

City Department: - Public Works

Address: - 8650 California Ave

City: - South Gate

State: - CA

ZIP: - 90280

Country: - USA

Email Address: - mmostahkami@sogate.org

Phone Number: - 323-563-9512

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Gladis Deras

Title: - Assistant Engineer

Dept./Co.: - Public Works

Address: - 8650 California Ave

City: - South Gate

State: - CA

ZIP: - 90280

Country: - USA

Email Address: - gderas@sogate.org

Phone Number: - 323-357-9661

Design Survey

Collect Responses

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Default Report

Displaying 31 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
207.105.49.2**Response Started:**
Monday, June 27, 2011 10:49:32 AM**Response Modified:**
Monday, June 27, 2011 11:03:53 AM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

TO MINIMIZE THE CITY WORK

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - HIEN NGUYEN, PE

Title: - ASSISTANT CITY ENGINEER

City Department: - PW

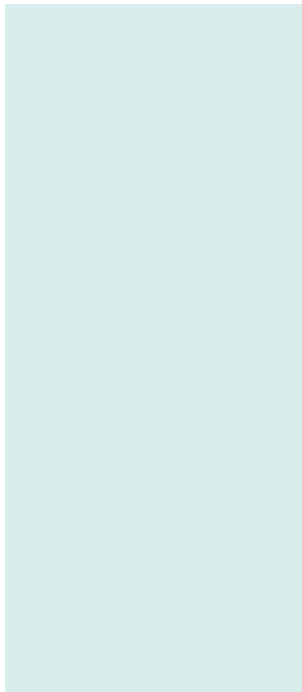
Address: - 500 N ALAMEDA ST

City: - COMPTON

State: - CA

ZIP: - 90220

Country: - USA



Email Address: - hnguyen@comptoncity.org

Phone Number: - 310-761-1476

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - CAROLYN WEBSTER

Title: - ENGINEERING CLERK

Dept./Co.: - PW

Address: - 500 N ALAMEDA ST

City: - COMPTON

State: - CA

ZIP: - 90220

Email Address: - cwebster@comptoncity.org

Phone Number: - 310-605-5505

Design Survey

Collect Responses

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Default Report

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

67.119.33.10

Response Started:

Monday, June 27, 2011 11:02:56 AM

Response Modified:

Monday, June 27, 2011 11:29:04 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Six watershed-based MS4 Permits using Regional Board Watershed Management Areas

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

If LACFCD is released as Principal Permittee, West Hollywood would prefer watershed-based permits. The City has a good working relationship with both the Santa Monica Bay watershed and the Ballona Creek Watershed jurisdictions and would be amenable to either group. West Hollywood would also be amenable to a Single MS4 Permit (with all agencies or per the 2006 ROWDS) if LACFCD remains principal permittee or based on an alternative lead agency arrangement.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Sharon Perlstein

Title: - City Engineer, West Hollywood

City Department: - Dept. of Public Works

Address: - 8300 Santa Monica Boulevard

City: - West Hollywood

State: - CA

ZIP: - 90069

Country: - USA

Email Address: - SPerlstein@weho.org

Phone Number: - 323-848-6400

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Lauren Langer

Title: - Assistant City Attorney, West Hollywood

Dept./Co.: - Jenkins & Hogin

Address: - 1230 Rosecrans Avenue #110

City: - Manhattan Beach

State: - CA

ZIP: - 90048

Country: - USA

Email Address: - LLanger@localgovlaw.com

Phone Number: - 310-643-8448

Design Survey

Collect Responses

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Default Report

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Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
71.106.89.199**Response Started:**
Monday, June 27, 2011 11:16:59 AM**Response Modified:**
Monday, June 27, 2011 11:41:49 AM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Per 2006 Reports of Waste Discharge (ROWDs)

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

It honors the preferences of other cities who submitted separate ROWDs, and includes LACFCD as principal permittee whose participation is essential in meeting Bacteria TMDLs. The condition, maintenance and operation of major storm drains, flood control basins/sumps and low flow diversions are critical for Bacteria TMDL compliance. LACFCD participation in a joint permit is also important and logical if they will be collecting and managing AB2554 stormwater quality funds.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Individual permittee chapters

Other (please specify) - Individual permit chapters for TMDL Implementation PLUS Low Impact Development which is an essential tool for TMDL compliance and should be tailored to the characteristics of the City as well as TMDL objectives.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Jim Arndt

Title: - Director of Public Works

City Department: - City of Manhattan Beach Department of Public Works

Address: - 3621 Bell Avenue

City: - Manhattan Beach
State: - CA
ZIP: - 90266
Country: - USA
Email Address: - jarndt@citymb.info
Phone Number: - (310) 802-5302

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Kathleen McGowan
Title: - Consultant for City of Manhattan Beach
Dept./Co.: - Kathleen McGowan, P.E.
Address: - 25 Rollingwood Drive
City: - Rolling Hills Estates
State: - CA
ZIP: - 90274
Country: - USA
Email Address: - Kathleen.EnvE@verizon.net
Phone Number: - 310-373-0330

Design Survey

Collect Responses

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Default Report

Displaying 34 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

216.156.160.2

Response Started:

Monday, June 27, 2011 11:36:52 AM

Response Modified:

Monday, June 27, 2011 11:46:59 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Other (please specify) - Watershed-based Permit

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

Watershed-based Permit - WMA or WAG

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

More localized management

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

Other (please specify workshop topic(s)) - BMP-Approach TMDL WLA's

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - John D. Ballas

Title: - City Engineer

City Department: - Engineering Department

Address: - 15625 E. Stafford St.

City: - City of Industry

State: - CA

ZIP: - 91744

Country: - USA

Email Address: - jdballas@cityofindustry.org

Phone Number: - 626-333-2211

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Michael Kolbenschlag

Title: - Director

Dept./Co.: - AEI-CASC Consulting, Inc.

Address: - 2740 W. Magnolia Blvd., #102

City: - Burbank

State: - CA

ZIP: - 91505

Country: - USA

Email Address: - Michael Kolbenschlag [mkolbenschlag@aei-casc.com]

Phone Number: - 818-841-9004

Design Survey

Collect Responses

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Default Report

Displaying 35 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

66.77.127.68

Response Started:

Monday, June 27, 2011 2:15:46 PM

Response Modified:

Monday, June 27, 2011 2:27:14 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Six watershed-based MS4 Permits using Regional Board Watershed Management Areas

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

N/A

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Existing TMDL's have been developed on a watershed basis. Given that the permit will include provisions and incorporate TMDLs for all permittees to comply with combined with the Los Angeles County Flood Control District no longer being the principal permittee, it is best to issue watershed permits. However, provisions should be written in which an exceedance/violation of a watershed TMDL or permit requirement will not punish all permittees within that watershed, but rather the private party and/or permittee at fault (i.e., the need to compare monitoring data may be required to determine the location of the exceedance/violation).

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - N/A

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Alvin Cruz

Title: - Senior Civil Engineer

City Department: - Public Works

Address: - 150 N. Third Street

City: - Burbank

State: - CA

ZIP: - 91510

Country: - USA

Email Address: -acruz@ci.burbank.ca.us

Phone Number: - 818-238-3941

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Daniel Rynn

Title: - Assistant Public Works Director

Dept./Co.: - Public Works - Wastewater

Address: - 150 N. Third Street

City: - Burbank

State: - CA

ZIP: - 91510

Country: - USA

Email Address: -drynn@ci.burbank.ca.us

Phone Number: - 818-238-3940

Design Survey

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Analyze Results

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Default Report

Displaying 36 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

198.179.206.13

Response Started:

Monday, June 27, 2011 1:20:29 PM

Response Modified:

Monday, June 27, 2011 2:54:19 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Other (please specify) - The city of Carson prefers a sub-watershed based group permit.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

At this point in time, the cities of Inglewood, Lawndale, Lomita and Gardena have agreed to participate in a watershed/subwatershed based group permit with the city of Carson. Other cities in the subwatershed such as Hawthorne and Torrance would be welcomed participants.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The subwatershed based group permit provides the best opportunity to maximize coordination among a small group of cities and agencies that have the same TMDL responsibilities.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Patricia Elkins

Title: - Storm Water Quality Programs Mgr

City Department: - Development Services

Address: - 701 E. Carson Street

City: - Carson

State: - CA

ZIP: - 90745

Country: - USA

Email Address: - pelkins@carson.ca.us

Phone Number: - (310) 847-3529

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Ray Tahir

Title: - consultant

Dept./Co.: - TECS Environmental

Address: - 106 S. Mentor Avenue, Suite 106

City: - Pasadena

State: - CA

ZIP: - 91106

Country: - USA

Email Address: - rtahir@tecsenv.com

Phone Number: - (626) 396-9424

Design Survey

Collect Responses

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Default Report

Displaying 37 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

76.79.169.100

Response Started:

Monday, June 27, 2011 2:40:02 PM

Response Modified:

Monday, June 27, 2011 3:01:56 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Per 2006 Reports of Waste Discharge (ROWDs)

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

We value LA County as the Principal Permittee and the benefits of their leadership and guidance. We understand that the County will manage the AB 2554 funds if approved by the voters. By keeping the County as Principal Permittee, we'll be able to maintain a level of consistency especially in the annual reporting process.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

Individual permittee chapters

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - David G. Liu

Title: - Director of Public Works

City Department: - Public Works

Address: - 21825 Copley Drive

City: - Diamond Bar

State: - CA

ZIP: - 91765

Country: - USA

Email Address: - DLiu@DiamondBarCA.Gov

Phone Number: - 909-839-7040

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Rick Yee

Title: - Senior Civil Engineer

Dept./Co.: - Publiv Works

Address: - 21825 Copley Drive

City: - Diamond Bar

State: - CA

ZIP: - 91765

Country: - USA

Email Address: - RYee@DiamondBarCA.Gov

Phone Number: - 909-839-7043

Design Survey

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Default Report

Displaying 38 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

65.116.143.84

Response Started:

Monday, June 27, 2011 3:17:58 PM

Response Modified:

Monday, June 27, 2011 3:20:23 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Mike OGrady

Title: - Environmental Services Manager

City Department: - Public Works

Address: - P.O. Box 3130

City: - Cerritos

State: - CA

ZIP: - 90703

Country: - USA

Email Address: - mogrady@cerritos.us

Phone Number: - 562-916-1226

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Hal Arbogast

Title: - Director of Public Works

Dept./Co.: - Public Works

Address: - P.O. Box 3130

City: - Cerritos

State: - CA

ZIP: - 90703

Country: - USA

Email Address: - harbogast@cerritos.us

Phone Number: - 562-916-1220

Design Survey

Collect Responses

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Default Report

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

71.106.89.199

Response Started:

Monday, June 27, 2011 3:45:55 PM

Response Modified:

Monday, June 27, 2011 4:02:17 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Per 2006 Reports of Waste Discharge (ROWDs)

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

It considers choices previously made by other cities that submitted separate ROWDs but keeps the LACFCD as the principal permittee which is important in order to achieve Bacteria TMDLs. LACFCD owns and operates the major storm drains, flood control basins with large pumps as well as the low flow diversions and the way the system is operated and maintained has a significant impact on Bacteria TMDL compliance. In addition if LACFCD is going to collect and manage AB2554 storm water quality funds, it only makes sense that they be involved in the joint permit.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - Individual permit chapters for TMDL Implementation PLUS Low Impact Development which is an important tool for TMDL compliance and should be tailored to characteristics of the City and TMDL objectives. This also allows agencies who have already developed an LID ordinance to work within that model rather than starting over with a one-LID-fits-all-cities approach.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Frank Senteno

Title: - Interim Director of Public Works

City Department: - City of Hermosa Beach Department of Public Works

Address: - 1315 Valley Drive

City: - Hermosa Beach

State: - CA

ZIP: - 90254

Country: - USA

Email Address: - fsenteno@hermosabch.org

Phone Number: - 310-318-0238

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Kathleen McGowan

Title: - Consultant for City of Hermosa Beach

Dept./Co.: - Kathleen McGowan, P.E.

Address: - 25 Rollingwood Drive

City: - Rolling Hills Estates

State: - CA

ZIP: - 90274

Country: - USA

Email Address: - Kathleen.Enve@verizon.net

Phone Number: - 310-373-0330

Design Survey

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

159.83.154.8

Response Started:

Monday, June 27, 2011 4:08:43 PM

Response Modified:

Monday, June 27, 2011 4:21:44 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Other (please specify) - Individual MS4 Permit for the Los Angeles County Flood Control District (LACFCD), per its November 2010 Report of Waste Discharge. No preference for other permittees.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

In November 2010, the LACFCD submitted an ROWD as an application for an individual permit. This ROWD contains a description of the LACFCD's preferred permit structure.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The LACFCD is not a municipality but is a special district that requires its own individual and unique permit requirements. As a flood control agency, the LACFCD conveys stormwater runoff but has no land use jurisdiction over the sources of the stormwater runoff that enters its system.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

Other (please specify workshop topic(s)) - We expect that the workshop on TMDL incorporation will also discuss compliance based on a BMP approach and clarification of the receiving water limitations and iterative process language to clearly define what constitutes compliance.

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Gail Farber

Title: - Director

City Department: - County of Los Angeles Department of Public Works

Address: - 900 S Fremont Avenue

City: - Alhambra

State: - CA

ZIP: - 91803

Country: - USA

Email Address: - gfarber@dpw.lacounty.gov

Phone Number: - (626) 458-4002

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Gary Hildebrand

Title: - Assistant Deputy Director

Dept./Co.: - County of Los Angeles Department of Public Works

Address: - 900 S Fremont Avenue

City: - Alhambra

State: - CA

ZIP: - 91803

Country: - USA

Email Address: - ghildeb@dpw.lacounty.gov

Phone Number: - (626) 458-4300

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Default Report

Displaying 41 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

208.57.72.92

Response Started:

Monday, June 27, 2011 12:03:20 PM

Response Modified:

Monday, June 27, 2011 4:43:20 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

To leverage limited resources, the City wishes to continue with the current Countywide/Regional permit structure, with new chapters to address subregional requirements based on the AB 2554 Watershed Groups which have been widely vetted and negotiated among permittees.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Other (please specify workshop topic(s)) - Discussion of incorporation of TMDL wasteload allocations into permit should include consideration of implementation plans/schedules for EPA-approved TMDLs and the use of non-numeric standards or BMPs and adaptive watershed management in lieu of numeric WQBELs. Other workshop topics we would like to hear include: i. Principle Permittee responsibilities. ii. Economic impact analysis & funding for implementation of unfunded State mandates.

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Bernardo Iniguez

Title: - Environmental Services Manager

City Department: - Public Works

Address: - 16600 Civic Center Drive

City: - Bellflower
State: - CA
ZIP: - 90706
Country: - USA
Email Address: - biniguez@bellflower.org
Phone Number: - 562-804-1424, ext. 2233

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Deborah Chankin
Title: - Director of Public Works
Dept./Co.: - Public Works
Address: - 16600 Civic Center Drive
City: - Bellflower
State: - CA
ZIP: - 90706
Country: - USA
Email Address: - dchankin@bellflower.org
Phone Number: - 562-804-1424, ext. 2217

Design Survey

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Default Report

Displaying 42 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
159.83.154.8**Response Started:**
Monday, June 27, 2011 4:44:32 PM**Response Modified:**
Monday, June 27, 2011 4:56:39 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

Other (please specify) - Single MS4 Permit for Los Angeles County (including cities and unincorporated County areas) but excluding the Los Angeles County Flood Control District. Preference is for a single Permit only if no permittee is held responsible for another permittee's discharges. Otherwise, preference is for an individual Permit for the unincorporated County areas, such as was issued to the City of Long Beach.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Because County unincorporated areas exist in all watersheds, the County prefers a single permit over participating in multiple permits. The administration of multiple permits would impose an unreasonable and unnecessary burden on the County. If watershed-based permits or other type of multiple permits are proposed for the city permittees, the County prefers an individual permit for itself, similar to the City of Long Beach permit.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Individual permittee chapters

Other (please specify) - It is our understanding that the Individual permittee chapters option entails a single permit containing a set of core requirements applicable to all permittees plus TMDL chapters specific to each permittee.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

Other (please specify workshop topic(s)) - We expect that the workshop on TMDL incorporation will also discuss compliance based on a BMP approach and clarification of the receiving water limitations and iterative process language to clearly define what constitutes compliance.

6. Please list the City's primary contact for continued communication regarding the Los Angeles County

MS4 permit development.

Name: - Gail Farber

Title: - Director

City Department: - County of Los Angeles Department of Public Works

Address: - 900 S Fremont Avenue

City: - Alhambra

State: - CA

ZIP: - 91803

Country: - USA

Email Address: - gfarber@dpw.lacounty.gov

Phone Number: - (626) 458-4002

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Gary Hildebrand

Title: - Assistant Deputy Director

Dept./Co.: - County of Los Angeles Department of Public Works

Address: - 900 S Fremont Avenue

City: - Alhambra

State: - CA

ZIP: - 91803

Country: - USA

Email Address: - ghildeb@dpw.lacounty.gov

Phone Number: - (626) 458-4300

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Response Type:
Normal ResponseCollector:
LA Regional Board Stormwater Unit
(Web Link)Custom Value:
*empty*IP Address:
64.60.105.2Response Started:
Monday, June 27, 2011 5:23:05 PMResponse Modified:
Monday, June 27, 2011 6:07:55 PM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Individual MS4 Permits for each Permittee

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The County of LA DPW/FCD has provided limited MS4P guidance, unless paid for their services. This makes a poor foundation for building a single Countywide permit as many cities will be unable to afford the needed support and there will be no mechanism to make the changes necessary to achieve water quality objectives, potentially leading to regional enforcement efforts or redistribution of resources among permittees. Like many cities, the City of Downey touches multiple watersheds and reaches within a single watershed. So watershed based permits would require the City to incorporate multiple potentially conflicting permits. Authority based permits, might be rational if funding was forthcoming. Unfortunately, we are looking at Spring of 2013, then likely litigation, then initiation of taxation, then distribution of resources, then project selection (assuming recent litigation allows regional BMPs, which is questionable). It appears questionable that the authorities will be funded during the term of this MS4 permit. In 2006 and recently, the City of Downey requested an individual permit, while cooperating/participating with fair regional monitoring efforts and studies to assess priority pollution sources and areas.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Monitoring program design

Other (please specify workshop topic(s)) - Using Board "approved" LID measures/ordinances as a condition to achieve a "safe harbor" or "deemed compliant" wet-weather TMDL/RWL compliance objective. Reconciling wet weather concentration based standards with Total Maximum Daily Loads, since current wet weather TMDLs discourage LID and runoff reduction efforts (by encouraging as much diluting runoff from clean redeveloped sites as possible).

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Gerald Greene

Title: - Principal Civil Engineer/Water Resources Control Specialist

City Department: - Department of Public Works

Address: - P.O.Box 7016

City: - Downey

State: - CA

ZIP: - 90241-7016

Country: - USA

Email Address: - ggreene@downeyca.org

Phone Number: - 562-904-7112

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - John Oskoui

Title: - Director of Public Works

Dept./Co.: - Department of Public Works

Address: - P.O.Box 7016

City: - Downey

State: - CA

ZIP: - 90241-7016

Country: - USA

Email Address: - joskoui@downeyca.org

Phone Number: - 562-904-7102

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Default Report

Displaying 44 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
12.164.26.194**Response Started:**
Tuesday, June 28, 2011 9:23:05 AM**Response Modified:**
Tuesday, June 28, 2011 9:28:13 AM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Individual MS4 Permits for each Permittee

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

No Response

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

No Response

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Reporting program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Joe Lambert

Title: - Community Development Manager

City Department: - Community Development - Planning

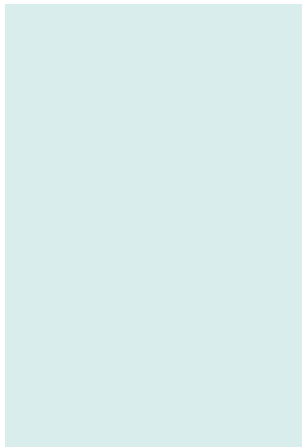
Address: - 9701 Las Tunas

City: - Temple City

State: - CA

ZIP: - 91780

Country: - USA



Email Address: - jlambert@templecity.us

Phone Number: - (626) 285-2171

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Steve Masura

Title: - Director of Community Development

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Default Report

Displaying 45 of 51 respondents

Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

4.22.114.34

Response Started:

Tuesday, June 28, 2011 10:38:56 AM

Response Modified:

Tuesday, June 28, 2011 10:42:43 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

A single permit with watershed "chapters" would still allow for economies of scale and uniformity of message for activities and programs that are best administered in a regional manner. For example, given economies of scale and coordination of message and effort, the public outreach component of the MS4 permit is best managed by a single entity at the regional level. Similarly, given the infrastructure and expertise of the LACFCD, monitoring should continue to be conducted by this entity to provide consistency. The LACFCD has expressed that it will continue to provide monitoring, but it may pass down costs to cities or watershed for more specific monitoring. Even under a single permit, the Regional Board envisions watershed "chapters" that contain permit components required to meet the specific needs of each watershed.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per Regional Board Watershed Management Areas

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

Monitoring program design

Regulation of non-stormwater discharges to/from the MS4

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Vivian Castro

Title: - Environmental Services Manager

City Department: - Public Works

Address: - 125 E College Street

City: - Covina

State: - CA

ZIP: - 91723

Country: - USA

Email Address: - vcastro@covinaca.gov

Phone Number: - 626-384-5484

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Steve Henley

Title: - Public Works Director

Dept./Co.: - Public Works

Address: - 534 N Barranca Street

City: - Covina

State: - CA

ZIP: - 91723

Country: - USA

Email Address: - shenley@covinaca.gov

Phone Number: - 626-384-5215

Design Survey

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Default Report

Displaying 46 of 51 respondents

Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
68.15.91.214**Response Started:**
Tuesday, June 28, 2011 1:10:14 PM**Response Modified:**
Tuesday, June 28, 2011 1:48:12 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Single MS4 Permit for Los Angeles County

Other (please specify) - We prefer a single permit for LA County in order to minimize costs associated with administering the permit, but if multiple permits are going to be issued, then our preferred structure is a Palos Verdes Peninsula group permit for the Cities of Rolling Hills, Rolling Hills Estates, Rancho Palos Verdes and Palos Verdes Estates.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

As stated above, if multiple permits are going to be issued, then our preferred structure is a Palos Verdes Peninsula group permit for the Cities of Rolling Hills, Rolling Hills Estates, Rancho Palos Verdes and Palos Verdes Estates.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Rolling Hills is a very small strictly residential city which is, by design, a low impact development. A permit that is responsive to the unique characteristics of the City while minimizing administrative and reporting costs would allow the City to focus its limited resources in protecting water quality.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - If a single permit is issued for LA County, we would like a separate chapter to address both TMDL and Low Impact Development requirements for the Palos Verdes Peninsula cities listed in Question 2. This approach would support our joint TMDL monitoring and implementation planning efforts and address the unique geology, topography and development characteristics of the Peninsula.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Anton Dahlerbruch

Title: - City Manager

City Department: - Administration

Address: - 2 Portuguese Bend Road

City: - Rolling Hills

State: - CA

ZIP: - 90274

Country: - USA

Email Address: - adahlerbruch@cityofrh.net

Phone Number: - 310.377.1521

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Kathleen McGowan

Title: - Consultant

State: - CA

Email Address: - Kathleen.EnvE@verizon.net

Phone Number: - 310.373.0330

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Default Report

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Response Type:
Normal Response**Collector:**
LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**
*empty***IP Address:**
64.72.101.2**Response Started:**
Tuesday, June 28, 2011 1:54:31 PM**Response Modified:**
Tuesday, June 28, 2011 3:11:22 PM**1. Which permit structure does your city prefer for an updated MS4 Permit?**

Nine watershed-based MS4 Permits per AB 2554 Watershed Authority Groups

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.**No Response****3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.**

Since the County is unwilling to be lead, the watershed approach would be most effective for Pomona.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Watershed-based chapters per AB 2554 Watershed Authority Groups

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

New development/redevelopment permit provisions, including LID

Monitoring program design

Reporting program design

Other (please specify workshop topic(s)) - All of these topics are important. Any major changes to the Permit should be discussed in a workshop forum to provide a mechanism to educate as well as receive feedback.

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Meg McWade

Title: - Utility Services Manager

City Department: - Public Works

Address: - 505 South Garey Avenue

City: - Pomona

State: - CA

ZIP: - 91768

Country: - Los Angeles

Email Address: - meg_mcwade@ci.pomona.ca.us

Phone Number: - 909-620-2392

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Denise Reyna

Title: - Admin Asst III

Dept./Co.: - Public Works

Address: - 505 South Garey Avenue

City: - Pomona

State: - CA

ZIP: - 91768

Country: - USA

Email Address: - denise_reyna@ci.pomona.ca.us

Phone Number: - 909-620-2223

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Response Type:
Normal Response

Collector:
LA Regional Board Stormwater Unit
(Web Link)

Custom Value:
empty

IP Address:
98.189.35.157

Response Started:
Wednesday, June 29, 2011 8:37:14 AM

Response Modified:
Wednesday, June 29, 2011 8:44:17 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

Other (please specify) - If the single permit is not implemented, we would like a permit which would include the four cities on the Palos Verdes Peninsula - us, RPV, RHE, and RH. We have worked very well together on TMDLs and have a unique situation in the County with our rural development and limited commercial/industrial land use.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

As stated above.

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

Having one permit minimizes costs for staff time and allows cities to spend our limited funding on implementation and not additional paperwork.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - A peninsula group as we have done in the past with ourselves, RHE, RPV, and RH.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Allan Rigg

Title: - Public Works Director

City Department: - Public Works

Address: - 340 Palos Verdes Drive West

City: - Palos Verdes Estates

State: - CA

ZIP: - 90274

Country: - USA

Email Address: - arigg@pvestates.org

Phone Number: - 310-378-0383

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Kevin Powers

Title: - Stormwater Consultant

Dept./Co.: - CAA

Address: - 27401 Los Altos #220

City: - Mission Viejo

State: - CA

ZIP: - 92691

Country: - USA

Email Address: - kevinpowers@caaprofessionals.com

Phone Number: - 310-864-6201

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

67.88.129.114

Response Started:

Wednesday, June 29, 2011 10:13:19 AM

Response Modified:

Wednesday, June 29, 2011 10:18:47 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

No Response

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The City of Rolling Hills Estates prefers a single permit for LA County, but if multiple permits are issued, then our second choice would be for a Palos Verdes Peninsula group permit for the cities of Rolling Hills Estates, Rolling Hills, Palos Verdes Estates and Rancho Palos Verdes.

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - Our preference would be for a single permit for LA County with a separate chapter for both TMDL and Low Impact Development requirements for the Palos Verdes Peninsula cities listed in Question 3. This approach would support our joint TMDL monitoring and implementation planning efforts and address the unique geology, topography and development characteristics of the Peninsula.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Greg Grammer

Title: - Assistant City Manager

City Department: - Public Works

Address: - 4040 Palos Verdes Drive North

City: - Rolling Hills Estates

State: - CA
ZIP: - 90274
Country: - USA
Email Address: - gregg@ci.rolling-hills-estates.ca.us
Phone Number: - 310-377-1577, ext. 107

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Kathleen McGowan
Title: - Consultant
Email Address: - kathleen.enve@verizon.net
Phone Number: - 310-373-0330

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Response Type:

Normal Response

Collector:LA Regional Board Stormwater Unit
(Web Link)**Custom Value:**

empty

IP Address:

173.200.85.38

Response Started:

Thursday, June 30, 2011 8:58:52 AM

Response Modified:

Thursday, June 30, 2011 9:03:21 AM

1. Which permit structure does your city prefer for an updated MS4 Permit?

Single MS4 Permit for Los Angeles County

Other (please specify) - If a single MS4 permit for Los Angeles County is used, the City of Rancho Palos Verdes would like to incorporate the TMDL requirements as described below in response to question #3.

2. If you selected "Other" in Q1, please provide a description of your city's preferred permit structure. If a group permit is preferred, please identify the other Permittees who would be included in the group.

As a second option, the City of Rancho Palos Verdes would opt for a joint permit of the Palos Verdes Peninsula cities (Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, and Palos Verdes Estates).

3. Please provide an explanation of your city's reason(s) for preferring the permit structure selected in Q1 above.

The City of Rancho Palos Verdes would prefer a consistent Los Angeles County permit. The City would like provisions in the permit to account for the unique geographical characteristics of the Palos Verdes Peninsula (upon which the City of Rancho Palos Verdes is located).

4. If your city prefers a single permit for Los Angeles County, which of the following internal structures would you prefer for incorporating TMDL requirements?

Other (please specify) - A Palos Verdes Peninsula wide TMDL implementation chapter with separate Low Impact Development (LID) requirements. LID requirements will support TMDL activities and the unique geographical characteristics of the area justify separate LID and TMDL requirements.

5. Please select the top 3 issues that your city would like to have a workshop on during permit development.

Incorporation of TMDL wasteload allocations into the permit

New development/redevelopment permit provisions, including LID

Monitoring program design

6. Please list the City's primary contact for continued communication regarding the Los Angeles County MS4 permit development.

Name: - Ron Dragoo, P.E.

Title: - Senior Engineer

City Department: - Public Works

Address: - 30940 Hawthorne Blvd.

City: - Rancho Palos Verdes

State: - CA

ZIP: - 90275

Country: - USA

Email Address: - rond@rpv.com

Phone Number: - 310-544-5253

7. Please provide a secondary contact for continued communication regarding the Los Angeles County MS4 Permit development below.

Name: - Andy Winje, P.E.

Title: - Associate Engineer

Dept./Co.: - Public Works

Address: - 30940 Hawthorne Blvd.

City: - Rancho Palos Verdes

State: - CA

ZIP: - 90275

Country: - USA

Email Address: - andyw@rpv.com

Phone Number: - 310-544-5249



**California Regional Water Quality Control Board
Los Angeles Region**

RB-AR412



Matthew Rodriquez
Secretary for
Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

September 13, 2011

Gail Farber, Chief Engineer
Los Angeles County Flood Control District
County of Los Angeles Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

Attention: Gary Hildebrand

**REISSUANCE OF WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL STORMWATER
AND URBAN RUNOFF DISCHARGES WITHIN THE COUNTY OF LOS ANGELES AND THE
INCORPORATED CITIES THEREIN: RECOMMENDED PERMIT STRUCTURE**

Dear Ms. Farber:

In May 2011, the staff of the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) initiated the process of reissuing the Municipal Separate Storm Sewer System (MS4) NPDES Permit for Los Angeles County. The proposed permit is scheduled for consideration by the Regional Board in the spring of 2012. Regional Board staff has met with permittees and stakeholders over the past months, and we meet regularly with staff from the Los Angeles County Flood Control District (District) to discuss stormwater and urban runoff discharges from the MS4 and, more recently, the proposed permit. These meetings have been a valuable opportunity to discuss with District staff technical and regulatory issues and concerns from the standpoint of the District as an owner and operator of the MS4.

One of the first issues that Regional Board staff has been addressing is the structure of the proposed MS4 permit. The existing permit includes 84 municipalities, the County of Los Angeles, and the District as co-permittees with the District serving as Principal Permittee. The purpose of this letter is to inform you that Regional Board staff intends to propose a somewhat different structure for the updated permit. Below, the decision-making process and rationale for a permit structure that recognizes watershed-based management of municipal stormwater and urban runoff is described.

California Environmental Protection Agency

First, we received and considered the Los Angeles County Flood Control District's individual Report of Waste Discharge (ROWD) and proposed Stormwater Quality Management Program (SQMP) dated November 24, 2010. The current LA County MS4 Permit was issued on December 13, 2006 as Order No. 01-182 and was amended on several occasions to incorporate permit provisions consistent with the assumptions and requirements of wasteload allocations established in TMDLs (Order No. R4-2006-0074; Order No. R4-2007-0042; Order No. R4-2009-0130; and pursuant to the peremptory writ of mandate in L.A. Superior Court Case No. BS122724 on October 19, 2010 and April 14, 2011).

Regional Board staff held a kick-off meeting on May 25, 2011 to discuss the preliminary schedule for permit development; identify potential alternative permit structures; and outline some of the major technical and policy aspects of permit development. Permittees and interested persons had an initial opportunity to ask questions of Regional Board staff, raise concerns, and provide feedback. As mentioned earlier, subsequent to the kick-off meeting, we have made ourselves available to discuss specifics with permittees, NGOs, consultants, and your agency.

With regard to alternative permit structures, Regional Board staff has considered several options, including a single permit with watershed chapters, multiple watershed-based permits, and individual permits for each entity. In order to solicit wider input on alternative permit structures from permittees, and per suggestions at the workshop, Regional Board staff developed and distributed an on-line survey to permittees using the on-line survey tool, SurveyMonkey®. The survey was distributed to all Los Angeles County MS4 permittees on June 14, 2011 and responses were requested within two weeks. Fifty-two permittees responded. The results of the survey indicated that a majority of permittees supported a single MS4 permit for Los Angeles County. A significant minority supported multiple watershed-based permits. Overall, 85 percent of respondents expressed support for either a single MS4 permit or watershed-based permits. A small number of respondents supported alternative permittee groupings other than watershed-based groupings. The District along with only three other respondents expressed a preference for individual MS4 permits.

Regional Board staff has considered a number of factors in its evaluation of these alternative permit structures. These factors include the locations and magnitude of the discharges from the MS4 to receiving waters, the quantity and nature of the pollutants discharged, and other

relevant factors (40 CFR §122.26(a)(1)(v)). Other key relevant factors in the Los Angeles Region are discussed below.

Regional Board staff has concluded that a single permit for Los Angeles County with watershed-based chapters will be the best structure. We have come to this conclusion given that the LA County MS4 is a large interconnected system, controlled in large part by the District, among others, and used by multiple cities along with Los Angeles County. The discharges from these entities frequently commingle in the MS4 prior to discharge to receiving waters. A single permit structure is supported by provisions in 40 CFR § 122.26(a)(3)(iv) and (v), which state that (1) the permitting authority may issue one system-wide permit covering all, or a portion of all municipal separate storm sewers in adjacent or interconnected large or medium municipal separate storm sewer systems and (2) permits that are issued on a system-wide basis may specify different conditions, including different management programs for different drainage areas.

A single permit will ensure consistency and equitability in regulatory requirements within the county, while watershed-based chapters within the single permit will provide flexibility to tailor permit provisions to address distinct watershed characteristics and water quality issues. Additionally, an internal watershed-based structure comports with the Los Angeles Regional Board's watershed-based TMDL requirements and the Los Angeles County funding initiative negotiated in AB 2554. Watershed-based chapters will help promote watershed-wide solutions to address water quality problems, which in many cases are the most efficient means to address stormwater and urban runoff pollution. Further, watershed-based chapters may encourage coordination among permittees to implement regional integrated water resources approaches such as stormwater capture and re-use to achieve multiple benefits.

Regional Board staff considered the District's 2010 ROWD, but did not find that an individual permit for the District would benefit water quality given the interconnected nature of the LA County MS4. Regional Board staff finds significant value in a permit structure where all responsible jurisdictions are working together towards integrated watershed solutions where possible. We have concluded that a single permit with watershed chapters is the most effective permit structure to balance regional consistency with opportunities for tailored watershed-based solutions to stormwater and urban runoff management. We also believe that given the

Ms. Gail Farber, Chief Engineer, LACFCD

- 4 -

September 13, 2011

opportunities for integration and collaboration that this structure will provide, it will prove the most cost-effective.

However, we do understand through the District's 2010 ROWD and subsequent discussions that the District does not wish to continue in its role as Principal Permittee. Regional Board staff respects the District's preferences in this regard and intends to propose a permit in which the District is relieved of this role.

Regional Board staff will continue discussions with the District regarding its roles and responsibilities under the proposed permit. We are receptive to considering new information over the coming months that may help inform our recommendations.

The details of the watershed-based internal permit structure will continue to be developed with consideration given to input from permittees and other stakeholders. If you have any questions, please do not hesitate to contact me at (213) 576-6605 or Mr. Ivar Ridgeway, Unit Chief, Stormwater Permitting at (213) 620-2150.

We look forward to continuing to work with the District on the reissuance of the Los Angeles County MS4 Permit.

Sincerely,



Samuel Unger, P.E.
Executive Officer

cc: Jennifer Fordyce, Office of Chief Counsel, State Water Board
Bruce Fujimoto, Division of Water Quality, State Water Board
John Kemmerer, Water Division, US EPA Region 9
Eugene Bromley, Water Division, US EPA Region 9



Matthew Rodriguez
Secretary for
Environmental Protection

California Regional Water Quality Control Board Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

RB-AR416



Edmund G. Brown Jr.
Governor

September 13, 2011

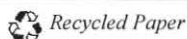
REISSUANCE OF WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL STORMWATER AND URBAN RUNOFF DISCHARGES WITHIN THE COUNTY OF LOS ANGELES AND THE INCORPORATED CITIES THEREIN: RECOMMENDED PERMIT STRUCTURE

Dear LA County MS4 Permittees and Other Interested Persons:

In May 2011, the staff of the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) initiated the process of reissuing the Municipal Separate Storm Sewer System (MS4) NPDES Permit for Los Angeles County. The proposed permit is scheduled for consideration by the Regional Board in the spring of 2012. The current LA County MS4 Permit was issued on December 13, 2006 as Order No. 01-182 and was amended on several occasions to incorporate permit provisions consistent with the assumptions and requirements of wasteload allocations established in TMDLs (Order No. R4-2006-0074; Order No. R4-2007-0042; Order No. R4-2009-0130; and pursuant to the peremptory writ of mandate in L.A. Superior Court Case No. BS122724 on October 19, 2010 and April 14, 2011).

One of the first issues that Regional Board staff has been addressing is the structure of the proposed MS4 permit. The existing permit includes 84 municipalities, the County of Los Angeles, and the Los Angeles County Flood Control District as co-permittees. The purpose of this letter is to inform you that Regional Board staff intends to propose a somewhat different structure for the updated permit. Below, the decision-making process and rationale for a permit structure that recognizes watershed-based management of municipal stormwater and urban runoff is described.

California Environmental Protection Agency



Regional Board staff held a kick-off meeting on May 25, 2011 to discuss the preliminary schedule for permit development; identify potential alternative permit structures; and outline some of the major technical and policy aspects of permit development. Permittees and interested persons had an initial opportunity to ask questions of Regional Board staff, raise concerns, and provide feedback. Subsequent to the kick-off meeting, we have made ourselves available to discuss specifics with permittees, NGOs, and consultants.

With regard to alternative permit structures, Regional Board staff described several options, including a single permit with watershed chapters, multiple watershed-based permits, and individual permits for each city. In order to solicit wider input on alternative permit structures from permittees, and per suggestions at the workshop, Regional Board staff developed and distributed an on-line survey to permittees using the on-line survey tool, SurveyMonkey®. The survey was distributed to all Los Angeles County MS4 permittees on June 14, 2011 and responses were requested within two weeks. Fifty-two permittees responded. The results of the survey indicated that a majority of permittees supported a single MS4 permit for Los Angeles County. A significant minority supported multiple watershed-based permits. Overall, 85 percent of respondents expressed support for either a single MS4 permit or watershed-based permits. A small number of respondents supported alternative permittee groupings other than watershed-based groupings. Only four respondents expressed a preference for individual MS4 permits.

Regional Board staff has considered a number of factors in its evaluation of these alternative permit structures. These factors include the locations and magnitude of the discharges from the MS4 to receiving waters, the quantity and nature of the pollutants discharged, and other relevant factors (40 CFR §122.26(a)(1)(v)). Other key relevant factors in the Los Angeles Region are discussed below.

Regional Board staff has concluded that a single permit for Los Angeles County with watershed-based chapters will be the best structure. We have come to this conclusion given that the LA County MS4 is a large interconnected system, controlled in large part by the Los Angeles County Flood Control District, among others, and used by multiple cities along with Los Angeles County. The discharges from these entities frequently commingle in the MS4 prior to discharge to receiving waters. A single permit structure is supported by provisions in 40 CFR § 122.26(a)(3)(iv) and (v), which state that (1) the permitting authority may issue one system-wide permit covering all, or a portion of all municipal separate storm sewers in adjacent or

interconnected large or medium municipal separate storm sewer systems and (2) permits that are issued on a system-wide basis may specify different conditions, including different management programs for different drainage areas.

A single permit will ensure consistency and equitability in regulatory requirements within the county, while watershed-based chapters within the single permit will provide flexibility to tailor permit provisions to address distinct watershed characteristics and water quality issues. Additionally, an internal watershed-based structure comports with the Los Angeles Regional Board's watershed-based TMDL requirements and the Los Angeles County funding initiative negotiated in AB 2554. Watershed-based chapters will help promote watershed-wide solutions to address water quality problems, which in many cases are the most efficient means to address stormwater and urban runoff pollution. Further, watershed-based chapters may encourage coordination among permittees to implement regional integrated water resources approaches such as stormwater capture and re-use to achieve multiple benefits.

We recognize that some permittees did submit individual or small group Reports of Waste Discharge (ROWDs) in 2006 and 2010. However, Regional Board staff finds significant value in a permit structure where all responsible jurisdictions are working together towards integrated watershed solutions where possible. We have concluded that a single permit with watershed chapters is the most effective permit structure to balance regional consistency with opportunities for tailored watershed-based solutions to stormwater and urban runoff management. We also believe that given the opportunities for integration and collaboration that this structure will provide, it will prove the most cost-effective. However, Regional Board staff is open to exploring options to provide flexibility for permittees that desire to work independently within the context of a single, watershed-based permit.

The details of the watershed-based internal permit structure will continue to be developed with consideration given to input from permittees and other stakeholders. If you have any questions, please do not hesitate to contact me at (213) 576-6605 or Mr. Ivar Ridgeway, Unit Chief, Stormwater Permitting at (213) 620-2150.

LA County MS4 Permittees
and Interested Persons

- 4 -

September 13, 2011

We look forward to continuing to work with permittees on the reissuance of the Los Angeles County MS4 Permit.

Sincerely,



Samuel Unger, P.E.
Executive Officer

cc: Jennifer Fordyce, Office of Chief Counsel, State Water Board
Bruce Fujimoto, Division of Water Quality, State Water Board
John Kemmerer, Water Division, US EPA Region 9
Eugene Bromley, Water Division, US EPA Region 9

Subject: RECOMMENDED PERMIT STRUCTURE
Created By: TRODGERS@waterboards.ca.gov
Scheduled Date:
Creation Date: 9/14/2011 2:31 PM
From: Theresa Rodgers

Recipient	Action	Date & Time	Comment
To: aford@cityofcalabasas.com (aford@cityofcalabasas.com)	Transferred	9/14/2011 2:33 PM	
To: ahernandez@ecmcorporation.com (ahernandez@ecmcorporation.com)	Transferred	9/14/2011 2:33 PM	
To: aqattan@lhhcity.org (aqattan@lhhcity.org)	Transferred	9/14/2011 2:33 PM	
To: bpollack@ci.gardena.ca.us (bpollack@ci.gardena.ca.us)	Transferred	9/14/2011 2:33 PM	
To: cbilldeau@huntingtonpark.org (cbilldeau@huntingtonpark.org)	Transferred	9/14/2011 2:33 PM	
To: charles.herbertson@culvercity.org (charles.herbertson@culvercity.org)	Transferred	9/14/2011 2:33 PM	
CC: csaldana@cityofbradbury.org (csaldana@cityofbradbury.org)	Transferred	9/14/2011 2:33 PM	
To: daryl_grigsby@ci.pomona.ca.us (daryl_grigsby@ci.pomona.ca.us)	Transferred	9/14/2011 2:33 PM	
To: dojeda@lynwood.ca.us (dojeda@lynwood.ca.us)	Transferred	9/14/2011 2:33 PM	
To: mdadian@cityofartesia.us (mdadian@cityofartesia.us)	Transferred	9/14/2011 2:33 PM	
To: mike.witzansky@redondo.org (mike.witzansky@redondo.org)	Transferred	9/14/2011 2:33 PM	
To: mmiyoshi@lawndalecity.org (mmiyoshi@lawndalecity.org)	Transferred	9/14/2011 2:33 PM	
To: pwinspector@lapuente.org (pwinspector@lapuente.org)	Transferred	9/14/2011 2:33 PM	
To: rbeste@torranceca.gov (rbeste@torranceca.gov)	Transferred	9/14/2011 2:33 PM	
To: ryalda@cityofcalabasas.com (ryalda@cityofcalabasas.com)	Transferred	9/14/2011 2:33 PM	
To: shannon.yauchzee@westcovina.org (shannon.yauchzee@westcovina.org)	Transferred	9/14/2011 2:33 PM	
To: ufeesago@carson.ca.us (ufeesago@carson.ca.us)	Transferred	9/14/2011 2:33 PM	

originally emailed 9/13/2011
returned for insufficient email addresses

9/14- corrected addresses above & resent

Subject: Fwd: RECOMMENDED PERMIT STRUCTURE
Created By: TRODGERS@waterboards.ca.gov
Scheduled Date:
Creation Date: 9/14/2011 3:13 PM
From: Theresa Rodgers

Recipient	Action	Date & Time	Comment
To: Carlos Santos (csantos@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: Deborah Smith (Dsmith@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: Frances McChesney (FMcChesney@waterboards.ca.gov)	Pending	12/31/1969 4:00 PM	
To: Ivar Ridgeway (iridgeway@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: Jennifer Fordyce (JFordyce@waterboards.ca.gov)	Pending	12/31/1969 4:00 PM	
To: Jenny Newman (jnewman@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: Jim Covin (jcovin@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: LB Nye (lnye@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: Rebecca Christmann (RChristmann@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: Samuel Unger (sunger@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	
To: Sarah Olinger (SOlinger@waterboards.ca.gov)	Pending	12/31/1969 4:00 PM	
To: Tracy Woods (twoods@waterboards.ca.gov)	Delivered	9/14/2011 3:13 PM	

Subject: RECOMMENDED PERMIT STRUCTURE
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 Scheduled Date:
 Creation Date: 9/13/2011 3:39 PM
 From: Theresa Rodgers

Recipient	Action	Date & Time	Comment
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To: Blaine Michaelis (Bmichaelis@ci.san-dimas.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Bob Russi (brussi@ci.la-verne.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Bonnie Teaford (bteaford@ci.burbank.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Bruce Pollack (bpollack@ci.gardena.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Chris Jeffers (cjeffers@ci.glendora.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Cliff Graves (cgraves@carson.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Craig Bradshaw (cbradshaw@ci.claremont.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Craig Hensley (chensley@accessduarte.com)	Transferred	9/13/2011 3:39 PM	
To: Dan Keeseey (dkeeseey@ci.la-verne.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Darrell George (georged@accessduarte.com)	Transferred	9/13/2011 3:39 PM	
To: Daryl Grigsby (daryl_grigsby@ci.pomona.ca.us)	Transferred	9/13/2011 3:39 PM	
To: David Davies (ddavies@ci.glendora.ca.us)	Transferred	9/13/2011 3:39 PM	
To: David Gustavson (dgustavson@beverlyhills.org)	Transferred	9/13/2011 3:39 PM	
To: Deborah Chankin (dchankin@bellflower.org)	Transferred	9/13/2011 3:39 PM	
To: Dirk Lovett (dirklovett@caaprofessionals.com)	Transferred	9/13/2011 3:39 PM	
To: Donald Penman (dpenman@ci.arcadia.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Francis Delach (fdelach@ci.azusa.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Gary DiCorpo (gdicorpo@ci.norwalk.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Greg Grammar (gregg@ci.rolling-hills-estates.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Greg Ramirez (gramirez@agoura-hills.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Hal Arbogast (harbogost@cerritos.us)	Transferred	9/13/2011 3:39 PM	
To: James DeStefano (James.Destefano@ci.diamond-bar.ca.us)	Undeliverable	9/13/2011 3:39 PM	501 5.1.3 Invalid address
To: James Starbird (jstarbird@ci.glendale.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Jeffrey Kolin (jkolin@beverlyhills.org)	Transferred	9/13/2011 3:39 PM	
To: Jeffrey Parker (jparker@ci.claremont.ca.us)	Transferred	9/13/2011 3:39 PM	
To: John Davidson (j davidson@ci.south-pasadena.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Jorge Rifa (jorger@ci.commerce.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Kevin Wilson (kwilson@ci.vernon.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Krishna Patel (kpatel@ci.san-dimas.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Kwok Tam (ktam@ci.irwindale.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Mark Whitworth (mwhitworth@ci.vernon.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Michael Egan (megan@bellflower.org)	Transferred	9/13/2011 3:39 PM	
To: Michael Flad (mflad@ci.burbank.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Mitchell Lansdell (mitchelllansdell@ci.gardena.ci.us)	Transferred	9/13/2011 3:39 PM	
To: Rairo Adeva (radeva@agoura-hills.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Rene Bobadilla (rbobadilla@ci.el-monte.ca.us)	Transferred	9/13/2011 3:39 PM	
CC: Renee Purdy (rpurdy@waterboards.ca.gov)	Read	9/13/2011 5:33 PM	
To: Robert Zarilli (bobz@ci.commerce.ca.us)	Transferred	9/13/2011 3:39 PM	
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To: Scott Ochoa (sochoa@ci.monrovia.ca.us)	Transferred	9/13/2011 3:39 PM	
To: Shin Furukawa (sfurukawa@ci.south-pasadena.ca.us)	Transferred	9/13/2011 3:39 PM	
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To: Steven Simonian (ssimonian@bellgardens.org)	Transferred	9/13/2011 3:39 PM	
To: Thomas Lynch (tlynch@ci.norwalk.ca.us)	Transferred	9/13/2011 3:39 PM	

To: Tito Haes (thaes@ci.azusa.ca.us)	Transferred	9/13/2011 3:39 PM
To: Tom Tait (ttait@ci.arcadia.ca.us)	Transferred	9/13/2011 3:39 PM
To: Uli Fe'esago (Ufeesago@carsonca.us)	Transferred	9/13/2011 3:39 PM
To: Vijay Singhal (vsinghal@baldwinpark.com)	Transferred	9/13/2011 3:39 PM
To: Angel Perales (aperales@cityofcudahy.ca.us)	Transferred	9/13/2011 3:39 PM
To: Anthony Coralles (tcoralles@cityofcalabasas.com)	Transferred	9/13/2011 3:39 PM
To: Anton Dahlerbruch (citymanager@cityofrh.net)	Transferred	9/13/2011 3:39 PM
To: Bruce Inman (binman@cityofsierramadre.com)	Transferred	9/13/2011 3:39 PM
To: Charles Herbertson (charles.herbertson@culvercity.org)	Transferred	9/13/2011 3:39 PM
To: Chris Marcarello (cmarcarello@cityofrosemead.org)	Transferred	9/13/2011 3:39 PM
To: Cindy Collins (ccollins@cityofsanmarino.org)	Transferred	9/13/2011 3:39 PM
To: Daryl Parrish (dparrish@covinaca.gov)	Transferred	9/13/2011 3:39 PM
To: David Carmany (dcarmany@citymb.info)	Transferred	9/13/2011 3:39 PM
To: David Pelser (dpelser@cityofwhittier.org)	Transferred	9/13/2011 3:39 PM
To: Elaine Aguilar (eaguilar@cityofsierramadre.com)	Transferred	9/13/2011 3:39 PM
To: Jeff Allred (jallred@cityofrosemead.org)	Transferred	9/13/2011 3:39 PM
To: Jim Arndt (jarndt@citymb.com)	Transferred	9/13/2011 3:39 PM
To: Jim Davis (jdavis@cityofinglewood.org)	Transferred	9/13/2011 3:39 PM
To: Jim Mitsch (jmitsch@cityofhawthorne.org)	Transferred	9/13/2011 3:39 PM
To: John Ballas (jdballas@cityofindustry.org)	Transferred	9/13/2011 3:39 PM
To: Julie Gutierrez (jgutierrez@cityofpasadena.org)	Transferred	9/13/2011 3:39 PM
To: Julio Fuentes (luwan@cityofalhambra.org)	Transferred	9/13/2011 3:39 PM
To: Ken Farfsing (kfarfsing@cityofsignalhill.org)	Transferred	9/13/2011 3:39 PM
To: Kevin Radecki (kradecki@cityofindustry.org)	Transferred	9/13/2011 3:39 PM
To: Lillian Myers (lmyers@cityofmaywood.org)	Transferred	9/13/2011 3:39 PM
To: Linda Lowery (Linda_lowry@cipomona.ca.us)	Transferred	9/13/2011 3:39 PM
To: Louis Medina (lmedina@cityofbell.org)	Transferred	9/13/2011 3:39 PM
To: Maria Dadian (mdadian@cityofartesia.ci.us)	Transferred	9/13/2011 3:39 PM
To: Mark Bozegian (mbozegian@cityoflancasterca.org)	Transferred	9/13/2011 3:39 PM
To: Mark Weinberg (mweinberg@cityofinglewood.org)	Transferred	9/13/2011 3:39 PM
To: Martha Balderama (mbalderrama@cityofmontebello.com)	Transferred	9/13/2011 3:39 PM
To: Mary Chavez (mchavez@cityofalhambra.org)	Transferred	9/13/2011 3:39 PM
To: Matt Ballantyne (mballantyne@cityofsanmarino.org)	Transferred	9/13/2011 3:39 PM
To: Michael Beck (mbeck@cityofpasadena.net)	Transferred	9/13/2011 3:39 PM
To: Michelle Keith (mkeith@cityofbradbury.org)	Transferred	9/13/2011 3:39 PM
To: Mike Mischel (mmischel@cityofpalmdale.org)	Transferred	9/13/2011 3:39 PM
To: Pastor Lopez (dradde@cityofavalon.com)	Transferred	9/13/2011 3:39 PM
To: Peter Cosentini (pcosentini@cityofmontebello.com)	Transferred	9/13/2011 3:39 PM
To: Richard Carver (rcarver@cityofhawthorne.org)	Transferred	9/13/2011 3:39 PM
To: Robert Neal (rneal@cityoflancasterca.org)	Transferred	9/13/2011 3:39 PM
To: Robert Wishner (rwishner@ci.walnut.ca.us)	Transferred	9/13/2011 3:39 PM
To: Robert Yalta (ryalta@cityofcalabasas.com)	Transferred	9/13/2011 3:39 PM
To: Rudy Gonzalez (rgonzalez@cityofartesia.ci.us)	Transferred	9/13/2011 3:39 PM
To: Saul Bolivar (sbolivar@cityofcudahy.ca.us)	Transferred	9/13/2011 3:39 PM
To: Stephen Williams (swilliams@cityofpalmdale.org)	Transferred	9/13/2011 3:39 PM
To: Steve Forster (sforster@cityoflamirada.org)	Transferred	9/13/2011 3:39 PM
To: Steve Helvey (shelvey@cityofwhittier.org)	Transferred	9/13/2011 3:39 PM
To: Steve Henley (shenley@covinaca.gov)	Transferred	9/13/2011 3:39 PM
To: Steve Myrter (smyrter@cityofsignalhill.org)	Transferred	9/13/2011 3:39 PM
To: Steven Hoeff (fire@cityofavalon.com)	Transferred	9/13/2011 3:39 PM
To: Thomas Robinson (trobinson@cityoflamirada.org)	Transferred	9/13/2011 3:39 PM
To: Wendell Johnson (wjohnson@comptoncity.org)	Transferred	9/13/2011 3:39 PM

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To: Yolanta Schwartz (ys@cityofrh.net)	Transferred	9/13/2011 3:39 PM
To: Allan Rigg (arigg@pvestates.org)	Transferred	9/13/2011 3:39 PM
To: Amad Qattan (aquattan@lhcity.org)	Transferred	9/13/2011 3:39 PM
To: Art Cervantes (acervantes@pico-rivera.org)	Transferred	9/13/2011 3:39 PM
To: Cherie Paglia (citymanager@hiddenhillscity.org)	Transferred	9/13/2011 3:39 PM
To: Chris Cash (ccash@paramountcity.com)	Transferred	9/13/2011 3:39 PM
To: Claude Bilodeau (cbilodeau@huntingtonpark.org)	Transferred	9/13/2011 3:39 PM
To: Dan Ojeta (dojeta@lynwood.ca.us)	Transferred	9/13/2011 3:39 PM
To: Dave Gilbertson (dgilbertson@rkagroup.com)	Transferred	9/13/2011 3:39 PM
To: David Liu (dliu@diamondbarca.gov)	Transferred	9/13/2011 3:39 PM
To: Dawn Tomita (d.tomita@lomitacity.com)	Transferred	9/13/2011 3:39 PM
To: Edward Hitti (ehitti@lcf.ca.gov)	Transferred	9/13/2011 3:39 PM
To: Elias Saykali (esaykali@montereypark.ca.gov)	Transferred	9/13/2011 3:39 PM
To: Enrique Zaldivar (enrique.zaldivar@lacity.org)	Transferred	9/13/2011 3:39 PM
To: Ernesto Marquez (emarquez@hgcity.org)	Transferred	9/13/2011 3:39 PM
To: Frank Senteno (fsenteno@hermosabch.org)	Transferred	9/13/2011 3:39 PM
To: Frank Wu (fwu@dpw.lacounty.gov)	Transferred	9/13/2011 3:39 PM
To: Gail Farber (gfarber@dpw.lacounty.gov)	Transferred	9/13/2011 3:39 PM
To: Gary Hildebrand (ghildeb@dpw.lacounty.gov)	Transferred	9/13/2011 3:39 PM
To: Gerald Caton (bhruden@downeyca.org)	Transferred	9/13/2011 3:39 PM
To: Howard Chambers (avarela@lakewoodcity.org)	Transferred	9/13/2011 3:39 PM
To: Jack Wayt (mtagle@elsegundo.org)	Transferred	9/13/2011 3:39 PM
To: James Enriquez (jenriquez@elmonteca.gov)	Transferred	9/13/2011 3:39 PM
To: Jim Thorsen (jthorsen@malibucity.org)	Transferred	9/13/2011 3:39 PM
To: Joe Vasquez (jvasquez@hgcity.org)	Transferred	9/13/2011 3:39 PM
To: John Nachbar (johnnachbar@culvercity.org)	Transferred	9/13/2011 3:39 PM
To: John Oskoui (joskoui@downeyca.org)	Transferred	9/13/2011 3:39 PM
To: Jorge Cisneros (jcisneros@huntingtonpark.org)	Transferred	9/13/2011 3:39 PM
To: Joseph Hoefgen (jhoefgen@pvestates.org)	Transferred	9/13/2011 3:39 PM
To: Linda Benedetti-Leal (lbenedetti@paramountcity.com)	Transferred	9/13/2011 3:39 PM
To: Lisa Rapp (sharris@lakewoodcity.org)	Transferred	9/13/2011 3:39 PM
To: Marlene Miyoshi (mmiyoshi@lawndalecity.org)	Transferred	9/13/2011 3:39 PM
CC: mgold@healthebay.org (mgold@healthebay.org)	Transferred	9/13/2011 3:39 PM
To: Miguel Santana (miguel.santana@lacity.org)	Transferred	9/13/2011 3:39 PM
To: Mike Conway (michael.conway@longbeach.gov)	Transferred	9/13/2011 3:39 PM
To: Mike Witzansky (mwitzansky@redondo.org)	Transferred	9/13/2011 3:39 PM
CC: ngarrison@nrdc.org (ngarrison@nrdc.org)	Transferred	9/13/2011 3:39 PM
To: Patrick West (patrick.west@longbeach.gov)	Transferred	9/13/2011 3:39 PM
To: Paul Talbot (ptalbot@montereypark.ca.gov)	Transferred	9/13/2011 3:39 PM
To: Raul Romero (rromero@lapuente.org)	Transferred	9/13/2011 3:39 PM
To: Rich Felipe (rfelipe@lapuente.org)	Transferred	9/13/2011 3:39 PM
To: Robert Brager (bbrager@malibucity.org)	Transferred	9/13/2011 3:39 PM
To: Roger Haley (rhaley@lynwood.ca.us)	Transferred	9/13/2011 3:39 PM
To: Ron Bates (rbates@pico-rivera.org)	Transferred	9/13/2011 3:39 PM
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To: Stephanie Katsouleas (skatsouleas@elsegundo.org)	Transferred	9/13/2011 3:39 PM
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To: Steve Mendoki (smendoki@lawndalecity.org)	Transferred	9/13/2011 3:39 PM
To: Vince Damasse (vdamasse@lomitacity.com)	Transferred	9/13/2011 3:39 PM
To: William Workman (bill.workman@redondo.org)	Transferred	9/13/2011 3:39 PM

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To: Andrew Pasmant (andrew.pasmant@westcovina.org)	Transferred	9/13/2011 3:39 PM
To: Anthony Ybarra (aybarra@soelmonte.org)	Transferred	9/13/2011 3:39 PM
To: Bill Pagett (bpagett@willdan.com)	Transferred	9/13/2011 3:39 PM
To: Bryan Ariizumi (bariizumi@templecity.us)	Transferred	9/13/2011 3:39 PM
To: Carolyn Lehr (clehr@rpv.com)	Transferred	9/13/2011 3:39 PM
To: Dominic Milano (dmilano@rkagroup.com)	Transferred	9/13/2011 3:39 PM
To: Don Jensen (djensen@santafesprings.org)	Transferred	9/13/2011 3:39 PM
To: Douglas Pritchard (dougp@rollinghillsestatesca.gov)	Transferred	9/13/2011 3:39 PM
To: George Troxcil (gtroxcil@sogate.org)	Transferred	9/13/2011 3:39 PM
To: Jose Pulido (jpulido@templecity.us)	Transferred	9/13/2011 3:39 PM
To: Ken Pulskamp (kpulskamp@santa-clarita.com)	Transferred	9/13/2011 3:39 PM
To: LeRoy Jackson (ljackson@torranceca.gov)	Transferred	9/13/2011 3:39 PM
CC: liz@smbaykeeper.org (liz@smbaykeeper.org)	Transferred	9/13/2011 3:39 PM
To: Martin Pastucha (martin.pastucha@smgov.net)	Transferred	9/13/2011 3:39 PM
To: Mohammad Mostahkami (mmostahkami@sogate.org)	Transferred	9/13/2011 3:39 PM
To: Oscar Delgado (odelgado@weho.org)	Transferred	9/13/2011 3:39 PM
To: Patrick Lang (plang@soelmonte.org)	Transferred	9/13/2011 3:39 PM
To: Paul Arevelo (parevelo@weho.org)	Transferred	9/13/2011 3:39 PM
To: Pedro Carillo (pedro@urbanassoc.com)	Transferred	9/13/2011 3:39 PM
To: Raymond Taylor (ray@wlv.org)	Transferred	9/13/2011 3:39 PM
To: Rob Besty (rbesty@torranceca.gov)	Transferred	9/13/2011 3:39 PM
To: Robert Bustos (rbustos@sgch.org)	Transferred	9/13/2011 3:39 PM
To: Robert Newman (rnewman@santa-clarita.com)	Transferred	9/13/2011 3:39 PM
To: Rod Gould (manager@smgov.net)	Transferred	9/13/2011 3:39 PM
To: Ron Ruiz (rruiz@sfcity.org)	Transferred	9/13/2011 3:39 PM
CC: rtahir@tecsenv.com (rtahir@tecsenv.com)	Transferred	9/13/2011 3:39 PM
To: Shannon Yauchzee (syauchzee@westcovina.org)	Transferred	9/13/2011 3:39 PM
To: Steven Preston (spreston@sgch.org)	Transferred	9/13/2011 3:39 PM
To: Thaddeus McCormack (thaddeusmccormack@santafesprings.org)	Transferred	9/13/2011 3:39 PM
To: Tom Odom (tomo@rpv.com)	Transferred	9/13/2011 3:39 PM

Rebecca Christmann - Revision of LA Co MS4 Permit

From: William Rice
To: Ridgeway, Ivar
Date: 2/21/2012 5:03 PM
Subject: Revision of LA Co MS4 Permit
CC: Adackapara, Michael; Purdy, Renee; Schneider, Joanne; Smith, Deborah;...

Mr. Ridgeway,

I work with Hope Smythe in the Inland Waters Planning Section here at Region 8. Since 2001, we have been working on the bacterial indicator TMDLs for Santa Ana River, Reach 3 and several tributaries. We adopted the TMDLs in 2005 and, in 2010, incorporated them into our MS4 permits for San Bernardino Co and Riverside Co.

One of the TMDL tributaries is Chino Creek. As you may know, portions of the Cities of Pomona and Claremont are tributary to San Antonio Creek, which is a significant tributary to Chino Creek. In light of this, we included the two cities as named parties in the TMDLs. Following a little regulatory arm-twisting, the two cities have been participating with the other dischargers in a TMDL task force to implement the TMDLs. With the incorporation of the TMDLs into the Riverside Co and San Bernardino Co MS4 permits and subsequent implementation actions, it is becoming a little challenging to properly address the situations with Pomona and Claremont and to have them work within the TMDL task force framework.

Consequently, we need to work out a more formal and proper regulatory path to continue to have the two cities work with the other dischargers here in our region. We understand that you all are planning to begin revising the LA County MS4 permit some time this calendar year and so we would like to discuss the possible ways of addressing the Pomona/Claremont situation through the LA County MS4 permit.

We appreciate your help in this matter. Please contact me (see my contact info below) or Hope Smythe (hsmythe@waterboards.ca.gov or (951) 782-4493) to continue this process.

Thanks,

Bill Rice

William B. Rice
Santa Ana RWQCB
(951) 782-4459
wrice@waterboards.ca.gov
RB8 Website - www.waterboards.ca.gov/santaana