

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

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

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 consistant and least administratively burdensome	Jun 27, 2011 8:08 AM
22	Considering our knowledge of the current permit, compared to the otehr 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.

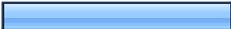
32	To better manage TMDLs and to propose reasonable MS4 Permit requirements.	Jun 22, 2011 1:57 PM
33	The Watershed Approach may provide a more tailored permit that reflects the differences in watershed areas and the specific challenges in addressing TMDLs.	Jun 22, 2011 10:59 AM
34	Consistent with needs 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

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