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November 4, 2013

Mr. Samuel Unger, Executive Officer
Los Angeles Regional Water Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Via email: samuel.unger@waterboards.ca.gov; Pavlova.Vitale@waterboards.ca.gov

Re: Comments on Los Angeles County MS4 Permittees' Low Impact Development and Green Streets Policies

Dear Mr. Unger,

On behalf of Heal the Bay, a non-profit environmental organization with over 15,000 members dedicated to making Southern California coastal waters and watersheds safe, healthy, and clean for people and aquatic life, we submit the following comments regarding the Low Impact Development ("LID") and Green Street policies submitted to the Regional Board for Los Angeles County MS4 permit ("MS4 Permit") Notice of Intent ("NOI") obligations.

The MS4 Permit allows for Permittees to have additional time to submit draft Watershed Management Plans, if draft LID and Green Street policies are in place within six months of permit adoption and in effect by the time of draft plan submittal. Additional time for planning is a big "carrot" to provide Permittees, thus it is critical that only LID and Green Streets policies that meet permit requirements and make meaningful water quality improvements are approved by the Regional Board. These policies are also critical in ensuring that early action to improve water quality occurs within this permit cycle.

We acknowledge the efforts of some Permittees to develop and adopt strong LID and Green Street policies in an expedited fashion. In several cases, Permittees took initiative to adopt policies prior to MS4 requirements, and this should be commended. However as discussed in detail below there are numerous cases where Permittees have submitted insufficient draft policies and/or insufficient information within the NOI for complete evaluation.

In fact, the majority of Permittees are not taking full advantage of these types of policies to help achieve ultimate compliance with the MS4 Permit. To this end, the Regional Board should encourage Permittees to go beyond the minimum requirements for the extra time incentive (i.e. 50% of the land area covered by the watershed group) and beyond the minimum requirements for the Planning and Land Development Program (i.e. coverage thresholds).

Outlined below, are general questions and concerns regarding draft LID and Green Street policies. We also include an attachment that provides specific concerns with proposed Green Street policies. We ask the Regional Board to carefully review each policy to ensure compliance with requirements in the MS4 Permit and move the Region forward in the near-term on water quality improvement.

LID Ordinances

- The Regional Board should ensure LID ordinances that were approved by the Regional Board are adopted and in-effect *before* draft Watershed Management Programs or draft Enhanced Watershed Management Programs are submitted. It is critical that the date the policies are "in-effect" is prior to the plan deadline. This is not clear in all the submittals that we have reviewed.
- We recommend that Permittees develop a LID guidance manual that includes allowable practices and standards. This would ensure that LID practices being implemented are appropriately designed for new development and redevelopment projects and the LID programs are implemented appropriately. An example of an NOI that includes this is the City of Cudahy, although we have not reviewed the manual for content. Also, Ventura Permittees developed a Manual under their MS4.
- We recommend that the Regional Board encourage the inclusion of monitoring programs in *all* LID programs. Having a robust dataset of LID practices would allow better understanding of BMP effectiveness, ultimately

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aiding in future design of LID BMPs. Additionally, monitoring BMP effectiveness and performance will help Permittees ensure proper operation and maintenance over time.

- We understand that the Regional Board cannot require Permittees to include LID provisions which go beyond the MS4 Permit minimum requirements; however, we ask that the Regional Board highlight how LID and green streets BMPs will help Permittees achieve permit compliance. For example adopting strong LID ordinances that have lower thresholds for projects covered by the policy, such as is included in the City of Los Angeles ordinance, will help lower pollutant loading.

Green Street Policies

- Many of the draft Green Streets policies submitted do not ensure that Green Streets projects will actually occur, and are thus insufficient to receive a time credit. For example, some differ to their Public Works directors to determine if funding is available before implementing a project. Others do not describe a clear trigger for Green Streets project to occur (i.e. monetary threshold or size of street project). If there is no guarantee that meaningful Green Streets projects will occur, the Permittee should not be granted additional time.
- All Green Street policies should include guidance manuals that outline more specific details about what BMPs will be implemented and how they will be designed. Some Permittees, such as Pico Rivera, Signal Hill, and Downey, provided guidance manuals that describe that Green Street projects will be designed to handle the 85th percentile standard design storm. Including BMP sizing and design requirements in policies holds Permittees to actually utilizing BMPs that will improve water quality.
- Many Permittees have included language or have stated that they **may** include language in the final policies that would require projects to have construction costs greater than \$500,000 **in addition to** the square footage requirements in order for Green Streets requirement to “kick-in”. For example, city of Commerce’s policy states that “projects with construction costs greater than \$500,000 **and** add at least 10,000 square feet of impervious surface” are subject to the policy. Triggers must be explicit in the policies. Also, the fact that the policies say that the monetary **and** size thresholds need to be met appears to be in conflict with the “applicability” requirements in the MS4 Permit.
- Several of the watershed groups pursuing Individual Watershed Management Plans have stated in the NOIs that they see “no necessity in placing or implementing a green street program in its Individual Watershed Management Program...because green infrastructure is associated with the Land Use Development Program which is a mandatory core Stormwater Management Program component that would be implemented even if a Permittee only chose to rely on its minimum control measures to achieve compliance with TMDLs and other water quality standards.” Carson, Compton, Gardena, Irwindale, Lawndale, Lomita, San Fernando, and West Covina all have the above mentioned language in their Notice of Intent. The Regional Board should reject the time extension for cities providing this reasoning.
- In the attached table we outline questions and concerns with specific green streets policies.

Thank you for the opportunity to comment on the LID ordinances and Green Street policies included in the MS4 Permit NOIs. We ask that you consider our above mentioned concerns. If you have any questions, please feel free to contact us at (310) 451-1500.

Sincerely,

Peter Shellenbarger, MESM
Science and Policy Analyst, Water Quality
Heal the Bay

Kirsten James, MESM
Science and Policy Director, Water Quality
Heal the Bay

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Attachment 1: Questions and Concerns with Green Street Policies for Permittees

City	Questions and Concerns
LA County	No trigger thresholds included in the policy. Additionally, the County references a “Green Infrastructure Guidelines” document; this document is not included with the policy on the Regional Board’s website. Additionally, we are concerned that there are no BMP design criteria included.
Los Angeles	The document included with the NOI does not appear to be a policy, but rather a recommendation memo. This should be clarified.
Bell Garden, Commerce	No policy included with the NOI.
Cudahy	A resolution was included that references a Green Street Manual. This submittal is insufficient.
Huntington Park	Section 2 of the policy should include language that explains how Green Streets implemented as a result of the policy will provide hydrologic and water quality benefits.
Vernon	The City references a guidance document, but does not include it with the policy.
Downey	Only a resolution and guidance manual included with the NOI. There is no trigger to ensure green streets projects move forward.
Long Beach	The document provided is not a Green Street Policy.
Lynwood	Simply implementing the EPA’s Green Infrastructure Guidance is insufficient. How do they define a “green street”? No BMP design guidance is given in the EPA the document.
Paramount	The city states they will not implement BMPs that lead to excessive maintenance or deterioration of street improvements. We are concerned that this provision will greatly limit Green Street project implementation. Also, project implementation is dependent upon the amount of funding available.
Pico Rivera	No policy included with the NOI.
Signal Hill	There is no clear trigger for action.
South Gate	A policy was adopted, but no impervious size triggers are included. It states that “the Director of Public Works is authorized to review each project on a case by case basis to determine if it meets the criteria of transportation corridors.” No BMP design or sizing guidance included in the policy.
Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, Covina, Industry, La Puente, Claremont, La Verne, Pomona, San Dimas	It appears that implementation of the policy is tied to funding. Also, we have concerns that the policy only applies to “major arterial” streets. This greatly limits the amount of streets that are applicable for Green Street projects.
Baldwin Park	Link on Region Board site is broken
Glendora, Artesia	No policy included with the NOI. Instead of a policy, the City provided a memo outlining a Green Street Policy.



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Bellflower	No BMP design criteria included in the policy. Cost trigger should be an alternative to impervious surface trigger.
Cerritos	Simply implementing the EPA’s Green Infrastructure Guidance is insufficient. How do they define a “green street”? No BMP design or sizing guidance is given in the document.
Diamond Bar, La Mirada, Norwalk, Whittier	No policy included with the NOI.
Hawaiian Gardens	Clear triggers need to be included in policy.
Lakewood	Policy needs to reference a guidance document.
Palos Verde Estates, Beverly Hills, Walnut,	No BMP design guidance included in the policy. It appears that implementation of the policy is tied to funding. Also, we have concerns that the policy only applies to “major arterial” streets. This greatly limits the amount of streets that are applicable for Green Street projects.
Rancho Palos Verde	No BMP design or sizing guidance included in the policy. It appears that implementation of the policy is tied to funding.
El Monte	The document provided is not a Green Street Policy.
Agoura Hills	The policy states that Public Works will only review new development and redevelopment projects for opportunities to incorporate Green Street BMPs. How will the Regional Board be certain the any Green Street BMPs will be implemented in Agoura Hills? No BMP design criteria are included in the policy.
Calabasas, Hidden Hills, Westlake Village	The Cities do not require Green Street projects to be implemented when impervious thresholds are met; instead they state that these projects will be reviewed for opportunities to incorporate Green Street BMPs. How will the Regional Board be certain that any Green Street BMPs are actually implemented? Policy needs to reference a guidance document.
Malibu	Cost trigger should be an alternative to impervious surface trigger. No impervious surface trigger included in the policy. No BMP sizing included in the policy.
Hermosa Beach	No impervious surface trigger included in the policy; instead, the City requires “large” development/redevelopment trigger. How does the City define “large”? The policy does not prioritize water quality improvements. The City needs to create a Green Street manual. Lastly, it appears that implementation of the policy is tied to funding.
Manhattan Beach, Redondo Beach, Torrance	No BMP design guidance included in the policy. We have concerns that the policy only applies to “major arterial” streets. This greatly limits the amount of streets that are applicable for Green Street projects. It appears that implementation of the policy is tied to funding.



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West Hollywood	Policy needs to reference a guidance document. Clear triggers that parallel the MS4 Permit need to be included in policy.
Carson, Compton, Gardena, Irwindale, Lawndale, Lomita, San Fernando, West Covina	No policy included in the NOI. City stated that they “see no necessity in placing or implementing its green street program in its I-WMP...because green infrastructure is associated with the Land Use Development Program which is a mandatory core SWMP component that would be implemented even if a Permittee only chose to rely on its minimum control measures to achieve compliance with TMDLs and other water quality standards.” The Regional Board should reject the time extension for cities providing this reasoning.

Los Angeles Regional Water Quality Control Board

TO: Los Angeles County MS4 Permittees

FROM: Samuel Unger, P.E. *SU*
Executive Officer

DATE: January 24, 2014

SUBJECT: **LOS ANGELES COUNTY MS4 PERMIT (ORDER NO. R4-2012-0175) EARLY ACTION REQUIREMENTS FOR PERMITTEES PURSUING AN ENHANCED WATERSHED MANAGEMENT PROGRAM OR 18-MONTH WATERSHED MANAGEMENT PROGRAM -- LOW IMPACT DEVELOPMENT ORDINANCES AND GREEN STREETS POLICIES**

The purpose of this memorandum is to clarify requirements for Permittees to undertake certain "early actions," including development and adoption of low impact development (LID) ordinances and green streets policies, where Permittees elect to develop an Enhanced Watershed Management Program (EWMP), or request an 18-month submittal date for a draft Watershed Management Program (WMP). These early action requirements were included in the permit in order to balance Permittees' request for additional planning time to develop EWMPs (30-month planning horizon) and WMPs (option of 18-month planning horizon) with the need for meaningful implementation actions in the early years of the new permit term. In order to be granted the additional planning time to develop an EWMP or a WMP, Permittees were required to undertake certain early actions. Specifically, pursuant to Part VI.C.4.c, Permittees requesting this additional planning time were required to:

1. (a) Demonstrate that there is a Low Impact Development (LID) ordinance(s) in place for their jurisdiction(s) **and/or** (b) commence development of a LID ordinance(s) for their jurisdiction(s) meeting all the requirements of the Los Angeles County MS4 Permit's Planning and Land Development Program by February 26, 2013, **and**
2. Where a LID ordinance(s) was not in place, Permittees were required to have a draft LID ordinance(s) developed for their jurisdiction(s) by June 28, 2013;
3. (a) Demonstrate that there was a green streets policy(ies)¹ in place for their jurisdiction(s) **and/or** (b) commence development of a policy(ies) that specifies the use of green street strategies for transportation corridors within their jurisdiction(s) by February 26, 2013, **and**

¹ The permit specifies development of a green street policy; however, a Permittee may opt to instead incorporate the necessary green street requirements into its LID ordinance such that the ordinance will ensure that green streets BMPs will be required of street and road construction projects within the Permittee's jurisdiction.

4. (a) Where a green streets policy(ies) was not in place, Permittees were required to have a draft green streets policy(ies) developed for their jurisdiction by June 28, 2013.

Where multiple Permittees chose to collaborate on an EWMP or a group WMP, the permit requirements reiterated in 1-4 above must be met in greater than 50% of the watershed area covered by the EWMP or WMP.

Where a Permittee chose to develop an individual WMP, the permit requirements reiterated in 1-4 above must be met in the Permittee's entire jurisdictional area.

Documentation demonstrating that these requirements were met had to be provided to the Regional Board as part of all Permittees' notifications of intent to develop an EWMP and had to be provided to the Regional Board as part of Permittees' notifications of intent to develop a WMP, where Permittees were requesting an 18-month submittal date for the draft WMP.

Unlike other "minimum control measures" that comprise a Permittee's baseline storm water management program, per Parts VI.C.5.b.iv.(1)(a) and (c), the provisions of the Planning and Land Development Program (Part VI.D.7) are not eligible for customization or elimination under an EWMP or a WMP. Therefore, when developing LID ordinances and green streets policies, Permittees should anticipate the requirements of Part VI.D.7. All Permittees participating in an EWMP or WMP must comply with all requirements of Part VI.D.7, Planning and Land Development Program, by the time the draft plan is submitted in order to have an approvable EWMP/WMP. In other words, by the time of draft EWMP/WMP submittal, all Permittees participating in the EWMP/WMP must have LID ordinances and green streets policies in place and must be conditioning projects, including street and road construction, per the requirements of Part VI.D.7.

Regarding Permittees' green streets policies and their relationship to the provisions of Part VI.D.7, it should be noted that while the early action requirements pertaining to green streets policies in Part VI.C.4.c emphasize implementation of green streets strategies in "transportation corridors," the Planning and Land Development Program requires that new street and road construction of 10,000 square feet or more of impervious surface area (and street and road redevelopment that results in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site) employ green street strategies per USEPA's guidance manual "Managing Wet Weather with Green Infrastructure: Green Streets" (EPA-833-F-08-009, December 2008) to the maximum extent practicable (see Part VI.D.7.b). The permit provisions state, "[s]treet and road construction applies to standalone streets, roads, highways, and freeway projects, and also applies to streets within larger projects" (Part VI.D.7.b.i.(1)(g)). In other words, ultimately, Permittees must condition road and street projects falling within the abovementioned project size thresholds to implement green street strategies, not just projects in "transportation corridors." Permittees should anticipate this broader applicability requirement as they develop and finalize their green streets policies per the early action requirements for an EWMP or 18-month WMP.

Further, final green streets policies (or accompanying design manuals that are developed and adopted by the Permittee as a companion document to a policy) must specify Best Management Practices (BMPs) included in the USEPA guidance manual for street and road projects falling within the abovementioned project size thresholds. Permittees may elect to tier green streets BMP implementation based on project size, complexity, cost, or other factors. An example of this tiering would be a Permittee requiring the implementation of planter/tree boxes and tree canopy rain interception for small scale projects and requiring the implementation of alternative

street widths, permeable pavers, bioswales, and vegetated curb extensions for larger, more costly street projects. Final green streets policies that do not prescribe a menu of specific BMPs for street and road projects within the project size thresholds specified in the permit will not comply with the requirements of Part VI.D.7.

Board staff strongly encourages Permittees to carefully evaluate their LID ordinances and green streets policies on this basis. Further, Board staff encourages Permittees to seek input from Board staff on revised drafts of their LID ordinances and green streets policies as early as possible and prior to City Council adoption to ensure that they are compliant with Part VI.D.7. Again, all Permittees participating in an EWMP/WMP must have LID ordinances and green streets policies in place and must be conditioning projects, including street and road construction, per the requirements of Part VI.D.7 by the time of draft EWMP/WMP submittal.

Regarding concerns over the loss of provisions of the 2002 Standard Urban Storm Water Mitigation Plan (SUSMP), particularly those in Section 2, Part 10.B-10.F related to individual priority project categories, the new permit has not eliminated requirements for source control. Many of the requirements for source control are found in Part VI.A as well as in other parts of the permit. (See, for example, Part VI.D.6.f, VI.D.9.e.vi, VI.D.9.f, VI.D.9.h.vi, among others.) In addition, several of the original SUSMP requirements were adopted in lieu of numeric criteria. For example, in 2002, retail gas outlets (RGOs) were allowed to implement BMPs rather than be subject to numeric criteria. The current permit requires RGOs to also comply with numeric criteria resulting in provisions more stringent than the 2002 SUSMP requirements. The requirements in the current Planning and Development section, in combination with other permit provisions (some of which are listed above), are more stringent and an evolution and enhancement of the 2002 SUSMP requirements.

If you have any questions or would like to arrange a meeting with Board staff, please contact Ivar Ridgeway via email at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Los Angeles Regional Water Quality Control Board

TO: Los Angeles County MS4 Permittees

FROM: Samuel Unger, P.E. *SU*
Executive Officer

DATE: April 16, 2014

SUBJECT: **COMMENTS ON LOW IMPACT DEVELOPMENT (LID) ORDINANCES
AND GREEN STREET POLICIES**

Regional Water Board staff has reviewed the low impact development (LID) ordinances and green street policies received from each watershed group for compliance with Part VI.D.7 of the LA County MS4 Permit (Order No. R4-2012-0175). As you are aware, the LA County MS4 Permit requires all permittees participating in an Enhanced Watershed Management Program (EWMP) or a Watershed Management Program (WMP) with an 18-month planning horizon to have final LID ordinances and green streets policies in place and to condition projects, including street and road construction, per the requirements of Part VI.D.7 by the time of the draft EWMP/WMP submittal.

Board staff notes that many watershed groups and individual Permittees utilized LID ordinance and green street policy templates; the use of templates has been encouraged as an efficient way for Permittees to implement these requirements. However, Board staff has identified some potential issues with the language and level of detail in the templates. Additionally, in some cases, draft LID ordinances and green streets policies have been revised since submittal of the Permittee's notification of intent to develop a WMP or EWMP; however, the revised LID ordinances and green streets policies have not been provided to Board staff. All of these issues have been shared verbally with a number of watershed groups. Because the issues are common to many or all of the watershed groups, these issues are summarized in this memorandum.

First, it is important for Permittees to apprise Board staff of revisions to their draft LID ordinances and green streets policies as they occur and to provide the revised drafts to Board staff. Board staff understands that it may be necessary to revise the draft ordinances and policies as a result of internal reviews and public input. In those instances, the Permittee should notify Board staff of these changes and submit the revised draft ordinance and/or green streets policy to the Regional Water Board as soon as possible. Keeping Board staff apprised of revisions and providing Board staff with the revised drafts in a timely fashion will facilitate the Board's review of the Permittee's draft WMP/EWMP.

The following are the specific issues that Permittees must address in the LID ordinances and green streets policies before each watershed management group submits their draft WMP/EWMP. If a Permittee has not yet finalized its LID ordinance and green streets policy, these issues should be addressed prior to adoption of the draft LID ordinances and green streets policies. Where a Permittee's LID ordinance and green streets policy has already been adopted, these issues should be addressed in companion LID and/or green street design manuals and in the draft WMP/EWMP.

- 1. In many cases the draft LID ordinances and green streets policies do not contain all of the technical specifications set forth in the LA County MS4 Permit, but direct project proponents to comply with the requirements of the LA County MS4 Permit or includes technical implementation details in accompanying design manuals or plans.**

Board staff understands the technical specifications required of LID projects are lengthy and may be better included in a technical design manual or implementation plan. Where Permittees rely on a design manual or implementation plan as an integral companion document to their LID ordinance and/or green streets policy, Permittees must submit these technical design manuals or implementation plans along with the draft LID ordinance and green streets policy so that Board staff is able to fully evaluate each Permittee's LID ordinance and green streets policy for compliance with the requirements of the LA County MS4 Permit.

- 2. In many cases the LID ordinances authorize Permittees to grant "waivers" from LID requirements and collect funds for projects that are granted waivers.**

As you are aware, the LA County MS4 Permit does not give permittees the discretion to waive LID requirements for projects subject to Part VI.D.7.b.i. However, the LA County MS4 Permit does allow the use of specified alternative compliance mechanisms if technical infeasibility is demonstrated for onsite retention. The use of alternative compliance pathways is only allowed under conditions defined in the LA County MS4 Permit. The use of the word "waiver" without a proper definition in the LID ordinance is potentially confusing. Permittees should avoid using the term "waiver" and instead should use the phrase "alternative compliance for technical infeasibility" consistent with the LA County MS4 Permit. Where a Permittee's LID ordinance has already been finalized, the term "waiver" must be clarified in a companion design manual, where one exists, and in the Permittee's draft WMP. Specifically, "waiver" shall be defined as meaning "alternative compliance for technical infeasibility" as set forth in Part VI.D.7.c.ii-iii of the LA County MS4 Permit.

- 3. In many cases LID ordinances state that alternative compliance options such as offsite infiltration and ground water replenishment projects may be available to the project site and directs the project applicant to contact the city to determine eligibility.**

The LA County MS4 Permit allows for alternative compliance options such as offsite infiltration and groundwater replenishment as long as these comply with additional requirements for these types of projects in the LA County MS4 Permit (e.g., timing of completion for offsite projects). The ordinances should either identify these additional requirements or state the requirement that these projects comply with all related provisions of the LA County MS4 Permit.

If any of these issues pertains to your draft LID ordinance or green streets policy, please contact your Regional Water Board staff contact and submit revised draft ordinances and green streets policies addressing the issues above as soon as possible. Additionally, if you have not done so already, submit to your Regional Water Board staff contact the companion LID and/or green streets technical design manuals or implementation plans. If you have any questions or would like to arrange a meeting with Board staff, please contact Ivar Ridgeway by phone at (213) 620-2150 or via email at Ivar.Ridgeway@waterboards.ca.gov.



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

June 20, 2014

Ms. Kirsten James
Science and Policy Director, Water Quality
Heal the Bay
1444 9th Street
Santa Monica, CA 90401

HEAL THE BAY COMMENTS ON LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMITTEES' LOW IMPACT DEVELOPMENT ORDINANCES AND GREEN STREETS POLICIES, PURSUANT TO THE LOS ANGELES COUNTY MS4 PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Ms. James:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board or Board) acknowledges receipt of your letter dated November 4, 2013, which commented on the low impact development (LID) ordinances and green streets policies proposed by Permittees who elected to develop an enhanced watershed management program (EWMP) or an watershed management program (WMP) with an 18-month planning period.

Regional Water Board staff reviewed the LID ordinances and green street policies submitted by the Permittees. In conducting the review, staff shared some of your questions and concerns regarding the development of appropriate LID ordinances and green street policies as early actions required for an extension of the submittal deadline for draft WMPs and EWMPs. Therefore, on January 24, 2014, the Regional Water Board issued a memorandum clarifying requirements for the development and implementation of LID ordinances and green street policies. Additionally, Board staff provided feedback to individual Permittees and groups where staff had questions or concerns regarding provisions of the draft LID ordinances and green streets policies to facilitate appropriate revisions prior to the finalization of the LID ordinance or green streets policy.

Subsequent to staff's initial review and issuance of the January 24, 2014 memorandum, staff determined that while the Permittees, as a whole, addressed the deficiencies in their draft LID ordinances, a number of the draft green streets policies submitted to the Board were lacking in specificity. Several of these green streets policies were based on a template that did not fully address Permit requirements. Therefore, on April 16, 2014, the Regional Water Board issued a second memorandum providing comments to Permittees on the remaining significant concerns regarding the LID ordinances and green streets policies.

The April 16, 2014, memorandum covers specific issues that Permittees must address in their LID ordinances and green streets policies prior to submitting their draft WMP/EWMP. The memorandum states that the deficiencies need to be addressed prior to the adoption of the final

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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LID ordinances and green streets policies. Two of the significant issues addressed in the memorandum were the use of associated technical guidance manuals and the proper use of LID waivers. Both memorandums issued by the Regional Water Board's Executive Officer are posted on the Board's website on the Los Angeles County MS4 Permit LID Ordinances and Green Streets Policies page at:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/lid_and_greenst/index.shtml

If you have any questions, please contact Mr. Ivar Ridgeway, Storm Water Permitting, at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosure

cc: David Smith, NPDES Program, USEPA Region IX
Jennifer Fordyce, Office of Chief Counsel, State Water Board