

**California Regional Water Quality Control Board, Los Angeles Region  
448<sup>th</sup> Regularly-scheduled Meeting of December 13, 2001 (Los Angeles)**

<b>Item</b>	10 ( <u>revised on December 10, 2001, as indicated by underlines and strikeouts</u> )
<b>Subject</b>	Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges, within the County of Los Angeles and the incorporated cities therein except for the City of Long Beach (hereafter referred to as the “municipal storm water permit” or “permit”).
<b>Purpose</b>	<p>To conduct a public hearing on the proposed Municipal Separate Storm Sewer System (MS4) permit for Los Angeles County and incorporated cities therein except the City of Long Beach. The Regional Board at the meeting will consider adoption of the permit after receiving comment from Permittees, interested parties, and the public.</p> <p>At a workshop on July 26, 2001, the Regional Board commented that the second draft permit was rather complete. Staff was asked to review the appropriateness of ambiguous terms in the second draft permit (such as "potential contribution"; "minimize"; "maximize", and "measurably") to ensure that permit requirements are enforceable, and issue a third draft in October for consideration at the November 29 Board Meeting. The tentative draft permit has been appropriately revised to be consistent with Regional Board direction. The Regional Board directed as follows:</p> <ul style="list-style-type: none"><li>• Ensure that the proposed permit requirements are at least as stringent as the Long Beach MS4 and Ventura County MS4 permits. Include specific language on trash Total Maximum Daily Loads (TMDLs) similar to the one in the Long Beach MS4 permit. Develop a strategy to get to compliance with water quality standards.</li><li>• Ensure that Best Management Practices (BMPs) being implemented are targeted to controlling particular pollutants of concern. Consider requiring permittees to enforce the Illicit Connection/ Illicit Discharges Elimination (ICID) programs with fines for illicit discharges and connections. Include an inspection program for gas stations in addition to outreach. Regional Board staff should upgrade their activities to monitor compliance and enforce implementation of the MS4 permit</li></ul>

- Review the draft permit requirements for conflicts with other state and federal regulations such as air pollution [water and chemical stabilizers for dust control] fire code, health and safety etc.
- Provide justification for the development thresholds for projects in environmentally sensitive areas [2,500 sq. feet of impervious surface. Review the requirement to map MS4 discharge points relative to the cost of setting up such a system.
- Review the suggestions by the Santa Monica Bay Restoration Project (SMBRP) on monitoring and reporting for inclusion.
- Identify a contact person on Regional Board staff to provide and assist in information on funding sources. Convene an advisory committee on the public information and participation program before the November public hearing.

## **Background**

The storm drain system regulated by the Board is principally owned and operated by the Los Angeles County Flood Control District (Principal Permittee). This system drains the coastal slopes of the Transverse Ranges, moving storm flows as well as a significant amount of dry weather runoff into the Santa Monica Bay and the Los Angeles/Long Beach Harbor.<sup>1</sup> It is one of the largest storm drain systems in the nation, when measured in terms of both aerial extent as well as differences in vertical elevations.

The storm drain system is also one of the most complex to operate, when considering that it encompasses 87 municipalities. Although principally owned and operated by the Principal Permittee, this system collects runoff from 87 municipalities, which, except for the City of Long Beach, are all Co-Permittees. These Co-Permittees have varying degrees of responsibility for development and maintenance of their portions of the overall system. The Permittees' physical assets that comprise the infrastructure of the system include over 100,000 catch basins, about 4,300 miles of underground storm drains, and about 500 miles of open channels. The City of Los Angeles alone accounts for 220 miles of open channel, 1,900 miles of storm drain pipe, and 62,660 catch basins. An exact summary of these physical assets in the system is not

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<sup>1</sup> The Los Angeles County Flood Control District also operates a storm drain system on the inland side of the Transverse Ranges; this system falls under the jurisdiction of the Lahontan Regional Board.

possible, as the Permittees do not have a comprehensive map or database that can accurately show the location, extent, and ownership of all underground drains and catch basins – which is an illustration of difficulties arising from the complex ownership structure of the storm drain assets.

**Regulatory History 1990:** The Regional Board adopted the first municipal storm water permit for the County in 1990, Order No. 90-079, which required Permittees to develop storm water/ urban runoff ordinances and implement BMPs – in particular, a minimum of 13 BMPs such as public education, street sweeping and construction site controls.

**1996:** After 18 months of effort to renew the 1990 permit, the Board adopted Order No. 96-054 (i.e. the existing permit – see attachment 10.E). Key elements of this permit were requirements that Permittees develop and implement model programs for Public Information and Participation, Industrial/Commercial Activities, Development Construction, Illicit Connections and Illicit Discharges Elimination, Public Agency Activities, and Development Planning. The permit does not include a requirement for inspections as part of an industrial/commercial control program; rather, after significant debate, the Board included a requirement that Permittees conduct site visits of industrial facilities in their jurisdictions. This was intended as an interim step, to give Permittees a 5-year period to educate businesses before requiring a stronger industrial/commercial control program.

**1999:** Following a settlement of the litigation brought by the City of Long Beach on Board Order No. 96-054, the Board adopted Order No. 99-060 with separate requirements for the City of Long Beach. The Regional Board Executive Officer during 1998 and 1999 approved countywide model programs for ICID, Development Construction, and Public Agency Activities after making revisions.

**2000:** The Permittees' proposed model program for Development Planning was vigorously debated in public workshops in 1999 and 2000, culminating in the Board's adoption of Order 00-02, specifying design criteria for a Standard Urban Storm Water Mitigation Plan (SUSMP). In response to a petition of the Board's action by 33 of the Permittees and other interested parties, the State Water Resources Control Board (State Board) affirmed in large part the Regional Board action (See State Board Order WQ 2000-11, attachment 10.F.1).

**2001:** On January 31, 2001, the Permittees submitted a renewal application for the permit, which expired on July 30, 2001.<sup>2</sup> Since then, staff, the Permittees, and Heal the Bay (on monitoring issues) have devoted significant time to exchanging information and reviewing drafts of the proposed permit, which will enter a third term since the initial permit was adopted in 1990. Staff conducted a staff workshop on April 24, 2001 after the first draft was issued. After the second draft was issued, staff conduct a workshop before the Regional Board on July 26, 2001. In addition, staff, on November 9, 2001, participated with some of the Permittees in a USEPA led workshop session to review inspection requirements after the tentative permit was issued.

**Compliance Status** Staff took very few actions to enforce the permit between 1996 and 2000, as lack of staff resources prevented rigorous oversight of Permittees' compliance status. Had staff resources been adequate for systematic compliance checks of all Permittees, many more enforcement actions most likely would have needed to be taken. The few enforcement actions that were taken were generally in response to complaints, and included 5 Notices of Violation (NOVs) issued to the:

- City of Culver City (February 1998), for failure to maintain erosion and sediment controls at one of its construction sites, which resulted in a discharge of mud into Ballona Creek. The City ultimately implemented sediment controls, but only after repeated discussions with Regional Board staff and the City's consultant.
- Cities of Pomona and Lynwood, for failure to submit Annual Reports for 1996/97 by the due date of October 15, 1997. The City of Lynwood submitted its delinquent Annual Report after receiving the NOV. The City of Pomona did not submit its Annual Program Report until the Executive Officer issued an Administrative Civil Liability (ACL) in the amount of \$6,700, which the City promptly paid.
- City of Alhambra, for a discharge of muddy water to the storm drain from a pipeline repair (1998). The City complied after receiving this NOV.
- City of Monterey Park, for failure to protect slopes from erosion at a city construction site on Ramona Boulevard (1999). The

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<sup>2</sup> Order No. 96-054 continues to be in effect until the Regional Board acts to reissue the permit (40 CFR § 122.6 (d)).

City of Monterey Park ultimately complied but only after repeated discussions with City staff.

In July 2001, staff completed a review of the 1999/00 Annual Program Report, and issued 11 NOVs for failure to implement various programs, including, among others, requirements to: modify planning procedures (such as a CEQA checklist) to integrate storm water considerations; and require pollution prevention plans at construction sites between 2 and 5 acres. The 11 NOVs were issued to each of the Cities of: Azusa, Cerritos, Huntington Park, Inglewood, Malibu, Maywood, Monrovia, Rolling Hills Estates, San Gabriel, South Pasadena, and Vernon. Many of these Permittees have vehemently objected to these NOVs, have submitted documentation of their objections, and demanded that the Regional Board Executive Officer invoke a “Notice to Meet and Confer” provision, as set forth in the existing permit (see also a discussion on this provision on page 8 of this Item). Regional Board staff has held the matter in abeyance, pending a review of the documentation submitted to date.

In March 2001, staff issued NOVs to each of the Cities of Los Angeles and Covina for discharges of sediment to the storm drain.

Staff are currently reviewing the 2000/2001 Annual Program Report which was submitted on October 22, 2001. A preliminary review of the Development Construction compliance reporting summarized in Table 1 indicates apparent implementation deficiencies, reporting inconsistencies, and possible violations of Board Order No. 96-054 among Permittees. For example, seventy-four municipalities reported that less than 5 percent of construction project approvals were being reviewed for storm water controls. Three municipalities did not report at all. Several municipalities reported that zero percent of projects were reviewed or inspected for construction controls because they were either considered exempt or were non-priority. On the other hand, other municipalities reported that 100 percent of projects were reviewed because all were considered priority.

**Permit Objectives**

Staff proposes consideration of a tentative permit that implements regulations and guidance from USEPA, State Board, and Regional Board. Specific objectives for the third-term renewal are to:

- more effectively prohibit non-storm water (dry weather) discharges to the storm drain system, through elimination of illicit connections and unauthorized discharges;

- more effectively reduce the discharge of pollutants in storm water; and
- require that Permittees implement additional control measures that the Board may determine are necessary for TMDLs that staff anticipates over the next five years.

## Permit Approach

To meet these objectives, staff has structured the tentative permit with several improvements over the existing permit, as outlined below:

1. **Findings:** Strengthened, to elaborate upon the technical and legal basis for the permit requirements. Included in these Findings are references to technical analyses staff conducted regarding regulation of retail gasoline outlets (RGOs); see Findings ~~C.5 and C.6~~ B.10. and B.11.
2. **Receiving Water Limitations** (Part 2, page ~~18~~ 17): Clarifies that discharges must meet water quality objectives, including that they must not cause nuisance (in addition to the statutory requirement to reduce the discharge of pollutants to the maximum extent practicable). Additionally, staff have added a requirement to implement load allocations approved by the Board in a TMDL, without reopening the permit.
3. **Storm Water Quality Management Plan (SQMP):** Adds specific performance measures to measure progress on the various elements of the SQMP. Furthermore, the following significant requirements have been added to the Permittees' SQMP:
  - **Industrial/Commercial Inspections** (Part 4, Section C – see discussion under critical issues on page A-10), ~~pages 33B-39B~~: ~~Option B (staff's recommended option) specifies that Permittees must expand a site visit program to also include inspections of facilities in specified industrial and commercial sectors. These sectors were selected based on the results of a risk-based prioritization performed by the County of Los Angeles Department of Public Works (LACDPW) in 1996 and critical sources monitoring conducted between 1997 and 2000.~~
  - **Development Planning** (Part 4, Section D, pages ~~36-44~~ 40-48): Lowers the threshold of industrial/commercial development that is subject to Standard Urban Storm Water Mitigation Plan (SUSMP) requirements from 100,000 square feet to one acre (consistent with USEPA Phase II regulations), beginning in 2003; and expands SUSMPs to cover:

- environmentally sensitive areas
- ministerial as well as discretionary projects.

Also, Permittees will need to ensure that design of RGOs comply with the SUSMP numerical design standards to capture and/or treat the first ¾ inches of precipitation (or equivalent runoff volume or flow). This design standard applies to new or redeveloped RGOs that exceed a threshold of 5,000 square feet of impervious surface area and projected Average Daily Traffic (ADT) of 100 vehicles. For derivation of this threshold, see Technical Reports [Attachment 10.B-2].

- **Development Construction** (Part 4, Section E, pages 44-47 ~~48 to 51~~): Lowers the threshold for a local Storm Water Pollution Prevention Plan (SWPPP) and wet weather inspection program to construction sites one acre and greater in size (currently two acres and greater in the existing permit). Also, requires that construction projects five acres and greater have a local SWPPP to demonstrate compliance with local ordinances. The local SWPPP may substitute for the State SWPPP required under the State's General Construction Activities Storm Water Permit if the local SWPPP is at least as inclusive in BMPs and construction controls.
  - **Public Agency Activities** (Part 4, Section F, pages 47-54 ~~52 to 59~~): Includes explicit requirements to control the discharge of trash to the MS4. It explicitly requires municipal departments to comply with the same development planning and development construction standards that municipalities impose on private development.
  - **Illicit Connections and Discharges** (Part 4, Section G, pages 54-56 ~~60 to 62~~): Requires the Principal Permittee to take more responsibility for tracking illicit discharges and connections, and upgrades passive field screening activities (during regularly scheduled maintenance) to a proactive field screening program.
4. **Monitoring (Attachment T)**: Adds mass emissions monitoring on the Santa Clara River and Dominguez Channel, and requirements to conduct a biomonitoring assessment with a minimum of 20 stations. Reduces the suite of monitoring

parameters that are not conventional and not priority pollutants. Enhances toxicity testing. Facilitates participation in regional research and special studies.

5. **Reporting: (Attachment U):** Includes a standard reporting form to elicit information on implementation and status of progress for the various requirements in the permit.
6. **Enforcement:** Deletes the Notice to Meet and Confer provision in the existing permit, and instead relies upon the State's policy of progressive enforcement.

Permittees have not provided specific estimates of additional costs that they might be incurred by the requirements highlighted above. The Los Angeles Economic Council cites a Caltrans report that the cost of compliance may exceed \$50 billion. Permittees have provided estimates of their 2000/01 and 2001/2002 budget allocations for storm water programs. These amounts aggregate to \$142 million and \$145 million respectively, and are reproduced in the tables 3 and 4<sup>3</sup> on pages ~~22-28~~ A 25- A 30.

## Critical Issues

Since receiving the application for renewal, on January 31, 2001, staff have dedicated significant time and effort to involving the public in the renewal process, and have been responsive to public comment. However, some critical issues have not been resolved to the satisfaction of all parties and are before the Regional Board, as summarized below.

### **Enforcement: *Should the new permit contain a safe harbor clause (i.e. a "Notice to Meet and Confer")?***

During the 18-month renewal effort from 1995 to 1996, the Regional Board approved a "Notice to Meet and Confer" (NTMC) provision (existing permit, Part 2, section G). Many of the Permittees strongly advocated for this provision, which they envisioned as an important administrative review process for resolving permit disputes before the Board could take formal enforcement action. It was actually used only once, in 2000, when the Regional Board issued NTMC letters in order to obtain information on permittees' efforts to abate trash in the Los Angeles River and Ballona Creek watersheds. As mentioned above, several Permittees want to invoke the NTMC as an interim step to any penalties the Board might issue for the 1999/00 Annual Program Report violations.

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<sup>3</sup> The amounts in the tables 3 and 4 (pages A 25-A30) are self-reported. As permittees may not have compiled their expenditures in a consistent manner, the amounts should be regarded as rough estimates.

Subsequent to renewal of the existing permit, the State developed an enforcement policy (State Board Resolution 96-030) and guidance, which sets forth a progressive strategy that has the goal of ensuring consistent, predictable, and fair enforcement of regulations. This is now a well-established and widely implemented policy throughout the State, and has been successfully implemented in Los Angeles Region. Therefore, staff submits that the NTMC provision should not be included in the renewed permit.

**Receiving Water Limitation: *In structuring a receiving water limitation, has staff correctly complied with State Board direction?***

Some environmentalists contend that the draft permit should contain numerical effluent limitations to protect water quality standards. Permittees, for the most part, believe that they should not be subject to either numerical or narrative receiving water limits, as their SQMP (Storm Water Quality Management Plan) is designed to reduce pollutants in storm water to the maximum extent practicable.<sup>4</sup>

In Part 2 (page ~~17~~ 16) of the ~~draft tentative~~ permit, staff incorporated narrative receiving water language as directed by the State Board in Order No. 99-05 (Attachment 10B-2). Subsections 2.1 and 2.2 slightly modify the State Board language in that: §§ 2.1 separately states that discharges that cause or contribute to the exceedences of water quality standards are prohibited, and §§ 2.2 separately states the discharges shall not cause a condition of nuisance [such as trash]. Some Permittees contend that these modifications exceed State Board Order No. 99-05. However, a review of language in other recent municipal storm water permits issued by the State Board itself and by other Regional Boards, indicates that the subsection language is substantially similar. The State Board upheld receiving water language, such as it appears in the tentative permit before the Board, affirms this structure of the receiving water limits language in its tentative decision *In Re: Building Industry Association of San Diego County and Western States Petroleum Association* (Order No. WQ 2001-15), ~~scheduled to be~~ adopted on November 15, 2001. See also Regional

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<sup>4</sup> Regulations do not define what exactly constitutes the Maximum Extent Practicable (MEP) standard. However, the Office of Chief Counsel has issued a memorandum on the matter (dated February 11, 1993). In general, MEP relies on best management practices that emphasize pollution prevention and source control (i.e. the first line of defense), with additional structural controls as needed (an additional line of defense). Municipalities are required to implement technically feasible BMPs to reduce storm water pollutants unless they can show locational impracticability or that the costs outweigh the water quality benefits to be derived.

Counsel's legal memorandum dated November 9, 2001  
(Attachment 10.D)

Some Permittees also contend that the draft language is inconsistent with the U.S. Court of Appeals decision in, *Defenders of Wildlife v. Browner* (9<sup>th</sup> Cir. 1999). This decision held that the Clean Water Act does not require MS4 discharges to strictly comply with water quality standards. However, the decision also found that the permitting authority can compel compliance with water quality standards, as it deemed necessary. As discussed in State Board's Office of Chief Counsel memorandum (Attachment 10.A-1), States can include such provisions under the Clean Water Act. In any case, the memorandum concluded that the 9<sup>th</sup> Circuit decision did not contradict State Board Order No. 99-05. See also, *In Re: Building Industry Association of San Diego County and Western States Petroleum Association* (Order No. WQ 2001- 15 xx)

**Inspections: *Should the Regional Board require Permittees to inspect industrial/commercial facilities?***

Yes. The County of Los Angeles is one of the most urbanized areas in the nation. If the Regional Board is to make significant progress toward cleaning up impaired waters, control of conventional and toxic pollutants from industrialized and commercial activities is critical. Indeed, the federal regulations clearly acknowledge the significance of pollutants from heavy industry, and mandate that municipal permittees have source control programs for facilities in specified industrial sectors. The significance of these industrial activities – plus commercial activities such as automotive repair – was underscored in a critical source identification program that the Principal Permittee undertook per a requirement in the existing permit.<sup>5</sup> Accordingly, staff proposes that the Board upgrade the Permittees' industrial control program to specify inspections of facilities in specified sectors at specified intervals.

In Table 4, staff has compared requirements among the existing permit and various options discussed with Permittees during this

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<sup>5</sup> Critical Source Selection and Monitoring Report, County of Los Angeles Department of Public Works (September 3, 1996), in which the Principal Permittee identified high risk activities that pollute storm water in the County. Five of these activities – scrap metals, trucking, chemical, primary metal, metal fabricating – are partly regulated by the State's General Industrial Activities Storm Water Permit for Industrial Activities. The other activity – automotive services – is not subject to the State's General Industrial Activities Storm Water Permit or to USEPA Phase 1 regulations. Also, through industrial waste inspections conducted during the first permit term for sanitation departments, several Permittees identified two additional activities – retail gas outlets (RGOs) and restaurants – as high risk for storm water pollution.

renewal process. Under the existing permit, no inspections are required; rather, the Board has allowed the Permittees and industry 10 years (i.e. the first two permit terms) to educate industrial and commercial facilities through “site visits.” Various options have evolved as follows:

First draft (April 13, 2001): Staff took a “top-down” approach to inspections, proposing that Permittees screen databases of tens of thousands of industrial and commercial facilities to identify facilities that should be targeted for an inspection program.

Second draft (June 29, 2001): In response to comments submitted on the first draft, staff attempted to better structure a partnership between the Regional Board and Permittees. The Regional Board would lead efforts to regulate “Phase 1” industrial facilities (which are subject to the State’s General Industrial Activities Storm Water Permit<sup>6</sup>), and the Permittees lead efforts to regulate other problem sectors, such as automotive service facilities, restaurants, and RGOs.

Third draft (October 11, 2001) Edited Tentative (December 12, 2001): Staff structured an Option A (pages 33A-39A) (pages 29A-35A in Edited Tentative) to encompass inspections of:

- USEPA mandated facilities (i.e. landfills, Resource Conservation and Recovery facilities, and toxics treatment storage disposal facilities “TSDF”),
- the automotive sector,
- restaurants, and
- retail gasoline outlets.

In Regional Board staff’s opinion, such a minimal requirement fails to address other critical industrial sources of pollutants. To address this concern and to ensure that pollutants from other critical sources are controlled, staff recommends that the Board adopt Option B (pages 33B-39B) (pages 29-35 in Edited Tentative). This Option B captures sectors in Option A plus five other priority sectors, which are sources of pollutants that match many of the

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<sup>6</sup> For select cities, Table 5 lists the number of facilities currently on record as covered under the State’s General Industrial Activities Storm Water Permit. For many of the cities (with the exception of the City of Los Angeles) the number of industrial facilities to be inspected is going to be similar if not the same because these facilities predominate in there jurisdiction.

causes of impairments to surface waters in Los Angeles County. These five priority sectors:

- scrap recycling,
- automotive dismantling,
- metal fabrication,
- motor freight,
- chemical manufacturing, and
- primary metal products.

Option C (pages 33C-36C) (pages 29C-35C in Edited Tentative) is status quo – it retains the site visit program as required by permits issued by the Regional Board since 1990. It does not recognize what staff believes was the Board’s long-term intent to upgrade the site visit program to an inspection-based program.

For a discussion on legal issues related to inspection, please refer to the Regional Counsel’s legal brief (Attachment 10.D. at pages 2 and 14).

At the request of certain Permittees, the US EPA facilitated two day-long sessions, on November 9<sup>th</sup> and 29<sup>th</sup>, during which discussions among permittees, Regional Board staff, and environmental representatives focused on inspection requirements. Participants made diligent attempts to understand various positions and limitations and, as a result, may have agreed in concept<sup>7</sup> to another option that is outlined in Version A/C. As this A/C option blends elements of the other options previously submitted to the Board and to the public, staff do not believe that they constitute significant changes. Rather, Version A/C provides greater clarity with regard to Regional Board expectations and responds to Permittees’ concerns over funding by better coordinating State (i.e. Regional Board) inspection efforts with those of the Permittees. Please refer to the Executive Officer’s letter, dated December 3, 2001, for a summary of the changes.

**Development Planning: Does the extension of SUSMP requirements to cover RGOs, ministerial projects, and environmentally sensitive areas, comply with the State Board’s SUSMP decision?**

Yes. The Development Planning subsection (Part 4, Section D, pages 36-44 26-53) incorporates SUSMP requirements as upheld by the

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<sup>7</sup> As of the morning of December 10, 2001, Regional Board staff are awaiting a decision from participants in that meeting regarding their support for the new Version A/C.

State Board in State Board Order No. 2000-11 “SUSMP Order” (Attachment 10.F.1) and corrects deficiencies that were identified.

The SUSMP Order set aside the applicability of the SUSMP requirements to development projects in environmentally sensitive areas and to ministerial projects, as defined in the California Environmental Quality Act (CEQA), until full and fair consideration by the Regional Board during permit reissuance. The SUSMP Order also set aside the applicability of numerical mitigation criteria to RGOs until the Regional Board provided proper justification and established thresholds. While some commenters have suggested that the proposed permit violates the SUSMP Order by the extension, a memorandum issued by the State Board Chief Counsel identifies these three areas as potential areas for extension of SUSMP requirements by Regional Boards in the future consistent with State Board guidance in its SUSMP Order (Attachment 10.F.1). Staff has prepared technical reports to support the extension of the SUSMP requirements (Attachment 10 B).

It is proper to extend coverage of SUSMP requirements to developments within, adjacent to or discharging directly to environmentally sensitive areas. Development and urbanization especially threaten environmentally sensitive areas, because these areas have a much lower capacity to withstand pollutant shocks than might be acceptable in the general circumstance. A development that is ordinarily insignificant in its impact on the environment may in a particular sensitive environment become significant. Staff has provided thresholds for developments in environmentally sensitive areas to exclude small developments (less than 2,500 square feet impervious surface) Edited Tentative at page 38 ~~Findings B-6, B-7, and E-4.~~

It is appropriate to apply numerical design criteria for storm water mitigation to new and redeveloped retail gasoline outlet developments. RGOs are points of convergence for vehicular traffic and are similar to parking lots and urban roads. Studies indicate that storm water discharges from RGOs have high concentrations of hydrocarbons and heavy metals. Pilot studies indicate that treatment control best management practices installed at retail gasoline stations are effective in removing pollutants, reasonable in capital cost, easy to operate, and do not present safety risks. RGOs in western States such as Oregon and Washington are already subject to storm water numerical mitigation criteria. As recommended by the State Board in its SUSMP Order, Board staff has established thresholds for the criteria to apply to

RGOs (5,000 square feet or more of impervious surface and projected Average Daily Traffic of 100 vehicles or more) with proper justification. Finding C.6., Edited Tentative at page 39~~Attachment 10.B.~~

It is proper to apply SUSMP requirements to all planning priority project SUSMP categories, including ministerial projects. The California Environmental Quality Act (CEQA) (Cal Pub Resources Code Section 21000 *et seq.*) requires that public agencies consider the environmental impacts of the projects they approve. CEQA applies to projects that are considered discretionary and does not apply to ministerial projects (i.e., projects which involve the use of established standards or objective measurements). For purposes of water quality, CEQA distinctions are not germane because it is a procedural statute that provides a public forum for consideration of environmental impacts of governmental decision-making. CEQA is not a statute for water quality protection. Municipalities have multiple ways of ensuring that SUSMP requirements are applied in a consistent manner within SUSMP categories. A municipality may give itself discretionary authority by adopting local ordinance provisions that create decision-making discretion for SUSMP categories. Alternatively, a municipality may establish standards and objective criteria for review of ministerial projects that are in SUSMP categories administratively.

Consistent with the Regional Board's action in the Ventura County municipal storm water permit, the proposed permit includes numerical design criteria for water quality flow in addition to water quality volume.

**Development Construction: *Are new requirements to inspect construction sites 1 acre or greater appropriate, and are they consistent with regulations and other permits?***

Small construction sites (1-5 acres) account for a significant amount of pollution from construction activities, in addition to construction sites five acres or greater. In response to this concern, the Development Construction subsection (starting in Part 4, Section E, Edited Tentative at page 44 ~~48 of the draft permit~~) requires that Permittees inspect all construction projects one acre or greater to ensure compliance with local agency ordinances and model programs to prevent erosion, control sediment, and manage on-site construction wastes.

The existing permit has a similar requirement for construction sites two acres or greater. Staff proposes to lower the threshold to 1 acre

beginning 2003, when USEPA Phase II regulations for small construction sites become effective. Also, the Regional Board has already issued municipal permits with such a requirement, to the City of Long Beach in 1999 and the County of Ventura in 2000.

**Total Maximum Daily Loads (TMDLs): *Should the Board include a provision requiring implementation of TMDL load reductions, without reopening the permit?***

TMDLs are one of the Board's highest priorities. In view of the Region's highly urbanized environment, it is likely that pollutants in storm water will be allocated significant load reductions. While specific load reductions can't be forecast at this time, staff has structured the permit as a vehicle for achieving load reductions (Part 3, Section C).

Public review of TMDLs, which will typically be in the form of an amendment to the Basin Plan, will occur during the TMDL adoption process; and staff does not anticipate that there will be a need for an additional public process for TMDL implementation measures. Therefore, upon approval of a TMDL, implementation of municipal storm water requirements (specified in that TMDL) will become effective and enforceable under the permit. In other words, municipal storm water requirements will be automatically included in this proposed permit upon adoption of a TMDL by the Board, without reopening this permit. This TMDL requirement and structure is consistent with TMDL provisions in the City of Long Beach and County of Ventura permits.

**Monitoring: *In the event that monitoring indicates storm water from a particular municipality as a source of toxicity, should the Regional Board require that Permittee to implement additional BMPs needed to reduce toxicity?***

Per the *Basin Plan*, there should be no toxicity in receiving waters. Per Parts 2 and 3 of the draft permit, Permittees must revise their Storm Water Management Plan (SQMP), as necessary, to meet receiving water limitations, including water quality objectives. Attachment T to the Monitoring and Reporting Program requires the Principal Permittee to monitor for toxicity and, upon finding toxicity, to conduct a "Toxicity Identification Evaluation" (TIE) and submit a "Toxicity Reduction Evaluation" (TRE) to the Regional Board. As a result of the TRE, the affected Permittee would then be responsible for modifying its SQMP to implement BMPs to eliminate toxicity based on the sources of toxicity within its jurisdiction.

**Illicit Connections and Discharges: *Should the Regional Board require the Principal Permittee to better track IC/ID (illicit discharge and illicit connection) problem areas, and should the Regional Board also upgrade Permittees' passive field screening program to better identify and eliminate IC/ID problems?***

During dry weather, much of the flow to the storm drain system consists of illicit discharges.<sup>8</sup> Reporting of these problems, as summarized in the Fact Sheet/Staff Report (pages 26 to 35), shows erratic IC/ID occurrences that bear no relationship to land uses or to estimated expenditures by Permittees. Under current operating practices, the Principal Permittee is unable to track reports of illicit connections and discharges in order to identify problem areas and prioritize corrective action. Many of the Permittees cannot estimate the length of their portion of the storm drain system. Many more of these Permittees are unable to estimate how much of their portion of the storm drain system has been field screened for IC/ID problems over the past 5 years, partly because the Permittees' existing SQMP requires field screening only "during regularly scheduled maintenance."

In the first draft, staff proposed that the Permittees develop a Geographical Information System (GIS) to better track IC/ID problems and, based upon annual evaluations of IC/ID problems, to implement an active screening program in problem areas. Several Permittees objected to this, stating that a GIS was too expensive to develop, and that simpler systems (e.g. pin maps) could suffice. In this draft, staff is proposing that the Principal Permittee – with the cooperation of Permittees – develop a system (type of system unspecified) to track and prioritize IC/ID problems. The Principal Permittee objects to this requirement out of concern over: (a) anticipated difficulties in coordinating with other Permittees, and (b) the cost of a GIS (as the Principal Permittee feels this is the only system that is sophisticated enough to comprehensively track IC/ID occurrences in the storm drain system), which cost could be well in excess of \$15 million.

Staff submits that a comprehensive map<sup>9</sup> or system is needed to track and evaluate IC/ID occurrences, that the Principal Permittee is the

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<sup>8</sup> Federal regulations (at 40 CFR 122.26 (b). 2.) define an illicit discharge as "...any discharge to an MS4 that is not composed entirely of storm water..." with some exceptions (such as NPDES-permitted discharges and emergency fire fighting flows).

<sup>9</sup> Indeed, basic requirements such as a map demonstrating a basic awareness of the storm drain system, are part of a Permittees' initial application requirements, and should have been met back in 1990 when the permit was first issued.

appropriate entity with adequate control to take on this responsibly, and that other Permittees should be required to undertake active field screening such needs are indicated by better tracking.

**Conclusion** Pollutants in dry weather runoff and storm water are the most significant source of impairment to water quality in the Los Angeles Region. For the third 5-year term of the Los Angeles County MS4 permit, staff has tried to carefully and reasonably structure requirements – including specific performance objectives – that are needed to better focus Permittees’ storm water management programs in order to more effectively control pollutants in storm water.

**Recommendation** Staff proposes that the Regional Board adopt the tentative permit - including Option B in the Industrial/ Commercial Inspection Program (pending concurrence from the Permittees, staff may change its recommendation to Option A/C). Comment letters submitted by the Permittees and interested persons, which were received by November 13, have been provided to the Board in Volumes 2 and 3 of Item 10, and an edited tentative permit (dated December 10, 2001) a change sheet (dated December 4, 2001) and a supplemental change sheet (dated December 10, 2001) should be inserted at the end of Section 10.B. will be compiled and forwarded to the Regional Board no later than November 21.

**Attachments** Correspondence, dated December 2, 2001, from the Executive Officer to the US EPA regarding the proposed inspection requirement (page A-19 and A-21).

**10.B. Tentative Permit Package**

1. Tentative Permit Strike-out Version (10/11/01)
2. Fact Sheet/ Staff Report/ Technical Reports (10/11/01)
3. Summary of Comments and Staff Response (10/11/01)
4. Edited Tentative (12/10/01)
5. Change Sheet – Draft (12/04/01)
6. Change Sheet Additions (12/10/01)

**10.C. Tentative Permit Clean Copy**

**10. D. Regional Counsel’s Legal Brief (11/09/01)**

**10. E. Regional Board Order No. 96-054 (07/15/96)**

**10. F. State Board Water Quality Orders**

1. LA SUSMP Order (Order No. WQ 2000-11) (03/08/00)

2. San Diego MS4 Permit Draft Order (Order No. WQ 2001-~~15\*\*~~) (11/1502/01)

#### **10.G. Additional Technical Reviews**

1. Staff Review of Storm Water Quality Task Force (SWQTF) BMP Guide (11/01)
2. WSPA Technical Report – Review of RGOs: New Development Design Standards (08/06/01)
3. SWQTF RGO BMP Guide (03/1997)

#### **10.H. Response**

1. Response to Comments (12/02/01)
2. RGO Technical Report (12/01)
3. Case for Inspection (11/01)

**Table 1. Summary of Development Construction Project Reviews and Inspections  
(July 2000 – June 2001 Annual Program Report)**



**Table 2. Comparison of Changes to the Industrial/ Commercial Facilities Program and Options for Consideration in the Tentative Draft**

Item	Existing Permit	Second Draft	Tentative Option A	Tentative Option B	Tentative Option C
<b>Focus</b>	USEPA Phase I facilities, Restaurants, RGOs, Automotive Service facilities	USEPA Phase I facilities, Restaurants, RGOs, Automotive Service facilities	Critical sources prioritization (regardless if they are industrial or commercial) based on the critical sources identification study prioritizing 34 categories	Critical sources prioritization (regardless if they are industrial or commercial) based on the critical sources identification study prioritizing 34 categories	USEPA Phase I facilities, Restaurants, RGOs, Automotive Service facilities
<b>Inspection</b>	NO	Restaurants, Automotive Service Facilities	USEPA Mandated: Municipal Landfills, Hazardous Waste Treatment, Disposal and Recovery Facilities, Facilities Subject to SARA Title III (also known as EPCRA), Restaurants (focus on Municipal BMPs), RGOs (focus on Municipal BMPs), Automotive Service Facilities (focus on Municipal BMPs)	<b>Same as Option A with the addition of</b> facilities identified as highest ranking in the critical sources evaluation: Wholesale trade (scrap, auto dismantling), Fabricated metal products, Motor freight, Chemical/allied products, Primary metals products	NO
<b>Site Visits</b>	USEPA Phase I facilities, Restaurants, RGOs, Automotive Service facilities	USEPA Phase I facilities	The remaining lower priority categories facility site visits All in the first 24 months, including “no-exposure” facilities.  In the second inspection cycle spot check visits at minimum 20% of the remaining total number/per year (excluded facilities deemed “no-exposure”)	The remaining lower priority categories facility site visits All in the first 24 months, including “no-exposure” facilities  In the second inspection cycle spot check visits at minimum 20% of the remaining total number/per year (excluded facilities deemed “no-exposure”)	USEPA Phase I facilities, Restaurants, RGOs, Automotive Service facilities
<b>Frequency</b>	Once every 24 months	Once every 24 months	Once every 24 months	Once every 24 months	Once every 24 months

"USEPA Phase I Facilities" means facilities in specified industrial categories that are required to obtain an NPDES permit for storm water discharges, as required by 40 CFR 122.26(c). These categories include:

- i. facilities subject to storm water effluent limitation guidelines, new source performance standards, or toxic pollutant effluent standards (40 CFR N)
- ii. manufacturing facilities
- iii. oil and gas/mining facilities
- iv. hazardous waste treatment, storage, or disposal facilities
- v. landfills, land application sites, and open dumps
- vi. recycling facilities
- vii. steam electric power generating facilities
- viii. transportation facilities
- ix. sewage or wastewater treatment works
- x. light manufacturing facilities



Program Management

SUMMARY OF FISCAL RESOURCES

Committee	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
LA Metro	\$184,318	\$20,313	\$87,133	\$666,161	\$23,710	\$0	\$0	\$881,110
La Puente	\$0,000	\$2,900	\$4,500	\$0,000	\$4,000	\$1,000	\$2,000	\$27,500
La Verne	\$20,000	\$5,000	\$10,000	\$100,000	\$30,000	\$0	\$0	\$220,000
La Habra	\$4,500	\$0	\$0	\$187,240	\$45,000	\$4,000	\$10,000	\$220,740
Long	\$4,000	\$7,000	\$0,000	\$250,000	\$0	\$0	\$30,000	\$291,000
Los Angeles	\$2,108,000	\$554,000	\$1,551,754	\$13,604,741	\$2,180,000	\$404,800	\$200,000	\$20,542,000
County of Los Angeles	\$3,135,550	\$145,000	\$170,000	\$90,448,000	\$4,135,550	\$432,751	\$601,000	\$41,407,351
Lynwood	\$10,000	\$2,000	\$0,000	\$447,000	\$10,000	\$2,000	\$0	\$461,000
Malibu	\$50,500	\$2,000	\$10,000	\$221,000	\$4,000	\$80,000	\$0	\$367,500
Manhattan Beach	\$24,000	\$4,000	\$2,000	\$100,000	\$10,000	\$2,000	\$200,000	\$1,100,000
Maywood	\$5,400	\$0	\$10,000	\$100,000	\$0,000	\$0	\$0	\$115,400
Monrovia	\$21,250	\$0,000	\$0,000	\$250,000	\$20,000	\$0	\$0	\$491,250
Monterey Park	\$10,000	\$10,000	\$0,000	\$200,000	\$10,000	\$0	\$0	\$230,000
North Hollywood	\$44,000	\$5,000	\$2,000	\$100,000	\$10,000	\$0	\$0	\$261,000
Palmdale	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
Pasadena	\$40,000	\$20,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$60,000
Pico Rivera	\$30,000	\$4,000	\$10,000	\$100,000	\$0,000	\$0	\$0	\$244,000
Pomona	\$10,000	\$25,000	\$10,000	\$0,000	\$10,000	\$0	\$0	\$45,000
Redondo Beach	\$44,000	\$5,000	\$2,000	\$100,000	\$10,000	\$0	\$0	\$261,000
San Dimas	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
San Gabriel	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
San Marino	\$0,000	\$0,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$0,000
Santa Ana	\$20,000	\$5,000	\$10,000	\$100,000	\$10,000	\$0	\$0	\$245,000
Santa Clara	\$20,000	\$5,000	\$10,000	\$100,000	\$10,000	\$0	\$0	\$245,000
Santa Fe Springs	\$20,000	\$5,000	\$10,000	\$100,000	\$10,000	\$0	\$0	\$245,000
Santa Monica	\$50,000	\$10,000	\$20,000	\$100,000	\$10,000	\$0	\$0	\$390,000
Santa Teresa	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
Signal Hill	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
South El Monte	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
South Gate	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
South Pasadena	\$40,000	\$10,000	\$20,000	\$100,000	\$10,000	\$0	\$0	\$380,000
Temple City	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
Torrance	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
Van Nuys	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000

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Program Management

SUMMARY OF FISCAL RESOURCES

Committee	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
Rancho Conejo Verde	\$0,000	\$4,000	\$10,000	\$100,000	\$1,000	\$0	\$0	\$115,000
Redondo Beach	\$10,000	\$2,000	\$2,000	\$100,000	\$10,000	\$0	\$0	\$124,000
Rolling Hills	\$20,000	\$5,000	\$10,000	\$100,000	\$10,000	\$0	\$0	\$245,000
Rolling Hills Estates	\$10,000	\$1,000	\$2,000	\$100,000	\$10,000	\$0	\$0	\$133,000
Rosemead	\$10,000	\$2,000	\$2,000	\$100,000	\$10,000	\$0	\$0	\$134,000
San Dimas	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
San Fernando	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
San Gabriel	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
San Marino	\$0,000	\$0,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$0,000
Santa Ana	\$20,000	\$5,000	\$10,000	\$100,000	\$10,000	\$0	\$0	\$245,000
Santa Fe Springs	\$20,000	\$5,000	\$10,000	\$100,000	\$10,000	\$0	\$0	\$245,000
Santa Monica	\$50,000	\$10,000	\$20,000	\$100,000	\$10,000	\$0	\$0	\$390,000
Santa Teresa	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
Signal Hill	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
South El Monte	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
South Gate	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
South Pasadena	\$40,000	\$10,000	\$20,000	\$100,000	\$10,000	\$0	\$0	\$380,000
Temple City	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
Torrance	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000
Van Nuys	\$10,000	\$1,000	\$0,000	\$0,000	\$0,000	\$0	\$0	\$11,000

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**Program Management**

**SUMMARY OF BUDGET RESOURCES**

Permittee	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
Winn	\$5,000	\$1,000	\$5,000	\$4,500	\$5,500	\$1,000	\$2,000	\$29,000
West Coast	\$150,000	\$0	\$0	\$170,250	\$0	\$0	\$0	\$320,250
West Hollywood	\$18,558	\$22,849	\$12,230	\$210,100	\$70,720	\$0	\$1,446,860	\$1,868,558
Warburton Village	\$10,510	\$9,999	\$5,925	\$106,730	\$10,700	\$77,175	\$0	\$194,070
Wright	\$20,000	\$20,000	\$5,000	\$51,000	\$10,000	\$0	\$10,000	\$116,000
<b>GRAND TOTAL</b>	<b>\$9,070,804</b>	<b>\$9,995,612</b>	<b>\$4,927,995</b>	<b>\$29,575,220</b>	<b>\$9,026,717</b>	<b>\$1,029,090</b>	<b>\$10,342,550</b>	<b>\$142,096,864</b>

**Table 4. Summary of Fiscal Resources Budgeted for FY 2001/2002**

**Program Management**

**SUMMARY OF FISCAL RESOURCES**

Permittee	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
Agua Hills	\$30,000	\$2,000	\$15,000	\$100,000	\$11,000	\$0	\$20,000	\$178,000
Alhambra	\$25,000	\$25,000	\$10,000	\$80,000	\$45,000	\$0	\$100,000	\$265,000
Arcadia	\$42,800	\$6,000	\$37,500	\$537,873	\$33,775	\$10,000	\$0	\$677,948
Artesia	\$5,300	\$200	\$5,400	\$1,400	\$12,500	\$250	\$0	\$28,850
Azusa	\$16,000	\$7,000	\$7,000	\$765,000	\$23,000	\$0	\$2,000	\$824,000
Baldwin Park	\$4,000	\$2,750	\$7,000	\$218,203	\$21,240	\$0	\$92,005	\$375,198
Bel	\$55,000	\$2,250	\$5,000	\$131,700	\$21,000	\$1,000	\$0	\$218,950
Bell Gardens	\$19,000	\$20,000	\$100,000	\$302,000	\$7,000	\$1,000	\$0	\$473,000
Bellflower	\$14,500	\$40,000	\$5,000	\$2,000	\$18,000	\$0	\$11,000	\$100,500
Beverly Hills	\$774,749	\$20,000	\$48,300	\$475,000	\$50,200	\$0	\$118,750	\$1,543,039
Bradbury	\$8,000	\$5,000	\$7,000	\$7,000	\$2,500	\$0	\$0	\$27,500
Burbank	\$211,000	\$128,000	\$157,000	\$1,573,000	\$85,000	\$4,000	\$292,000	\$2,470,000
Carobos	\$68,604	\$0,000	\$20,000	\$485,000	\$15,500	\$25,000	\$200,000	\$808,204
Carson	\$10,000	\$0,000	\$5,000	\$344,200	\$28,880	\$0	\$0	\$392,080
Castro	\$12,000	\$11,000	\$12,500	\$265,000	\$12,000	\$2,000	\$10,000	\$414,500
Claremont	\$48,008	\$22,872	\$70,247	\$118,000	\$11,415	\$0	\$0	\$651,641
Commerce	\$20,000	\$6,000	\$5,000	\$105,000	\$10,000	\$0	\$325,000	\$470,000
Compton	\$17,000	\$7,150	\$5,600	\$428,000	\$28,250	\$0	\$0	\$487,500
Covina	\$49,470	\$19,120	\$4,810	\$215,900	\$20,500	\$0	\$0	\$309,900
Cudahy	\$8,000	\$2,000	\$5,000	\$87,000	\$4,000	\$1,000	\$0	\$118,000
Culver City	\$30,000	\$10,000	\$5,000	\$2,865,000	\$34,900	\$0	\$2,980,000	\$5,814,900

**Program Management**

**SUMMARY OF FISCAL RESOURCES**

Permittee	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
Diamond Bar	\$23,081	\$32,389	\$33,854	\$229,171	\$29,012	\$0	\$0	\$447,507
Downey	\$75,000	\$3,000	\$75,450	\$703,722	\$25,000	\$0	\$0	\$877,172
Duarte	\$10,000	\$15,000	\$10,000	\$425,100	\$0	\$0	\$0	\$460,100
El Monte	\$12,000	\$6,000	\$5,000	\$202,000	\$46,300	\$0	\$0	\$271,300
El Segundo	\$10,000	\$10,000	\$21,000	\$95,000	\$5,000	\$20,000	\$10,000	\$171,000
Garden	\$100,000	\$12,000	\$2,000	\$177,900	\$22,200	\$0	\$0	\$314,100
Glendale	\$145,150	\$310,819	\$692,519	\$11,996,176	\$243,203	\$0	\$0	\$12,347,867
Glendora	\$50,000	\$50,000	\$15,000	\$100,000	\$30,000	\$0	\$0	\$245,000
Hawthorn Gardens	\$5,000	\$9,000	\$9,000	\$82,000	\$1,000	\$0	\$0	\$107,000
Hawthorne	\$5,870	\$0,000	\$11,100	\$255,000	\$20,025	\$0	\$38,000	\$341,075
Hermosa Beach	\$13,800	\$9,000	\$16,950	\$9,112,967	\$17,712	\$0,000	\$10,000	\$9,179,429
Hobart Hills	\$12,800	\$12,700	\$12,000	\$10,600	\$20,000	\$0	\$0	\$68,100
Huntington Park	\$105,000	\$8,150	\$45,000	\$249,500	\$5,250	\$0,000	\$77,000	\$489,900
Industry	\$98,000	\$21,000	\$122,000	\$345,000	\$233,000	\$0	\$5,500	\$704,500
Inglewood	\$55,000	\$120,000	\$23,000	\$180,000	\$98,000	\$7,000	\$0	\$1,023,000
Inverdale	\$25,000	\$16,000	\$7,500	\$80,000	\$5,000	\$0	\$5,000	\$147,500
La Canada Flintridge	\$10,000	\$8,000	\$77,500	\$328,275	\$10,000	\$30,000	\$0	\$453,775
La Habra Heights	\$2,000	\$0	\$1,000	\$1,000	\$1,000	\$1,000	\$0	\$6,000
La Habra	\$35,000	\$28,000	\$15,000	\$591,000	\$30,000	\$0	\$125,000	\$824,000
La Mirada	\$223,079	\$43,870	\$250,000	\$493,548	\$7,500	\$0	\$0	\$1,218,497
La Puente	\$3,000	\$1,700	\$2,200	\$9,000	\$7,500	\$500	\$0	\$13,150

**Program Management**

**SUMMARY OF FISCAL RESOURCES**

Permittee	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
La Verne	\$20,000	\$5,000	\$15,000	\$141,400	\$27,000	\$0	\$0	\$221,400
Lanternvale								
Lomita	\$4,000	\$2,000	\$2,000	\$253,000	\$0	\$0	\$50,000	\$297,000
Los Angeles	\$2,117,500	\$954,247	\$1,065,915	\$13,695,319	\$2,545,701	\$570,527	\$570,520	\$21,662,529
County of Los Angeles	\$4,084,250	\$657,423	\$325,320	\$48,341,678	\$3,532,599	\$700,000	\$0	\$59,062,967
Lynwood	\$8,000	\$1,000	\$2,000	\$3,000	\$5,000	\$2,000	\$0	\$21,000
Malibu	\$85,250	\$3,000	\$10,000	\$213,244	\$8,880	\$153,000	\$0	\$479,997
Manhattan Beach	\$24,000	\$4,000	\$5,500	\$235,600	\$22,400	\$1,000	\$500,000	\$805,000
Maywood	\$5,400	\$0	\$10,500	\$103,000	\$3,750	\$0	\$0	\$122,650
Monrovia	\$21,424	\$5,259	\$10,220	\$264,222	\$29,587	\$0	\$0	\$337,611
Montebello	\$12,100	\$15,100	\$5,000	\$212,000	\$11,000	\$22,800	\$210,000	\$873,000
Monterey Park	\$20,000	\$3,800	\$5,000	\$482,201	\$20,300	\$0	\$291,144	\$973,145
Norwalk	\$55,000	\$5,000	\$12,000	\$937,916	\$95,100	\$0	\$0	\$1,095,016
Palo Verde Estates	\$10,000	\$35,000	\$17,000	\$1,250,000	\$0,900	\$0	\$0	\$1,322,900
Pasadena	\$10,000	\$3,000	\$23,000	\$285,200	\$19,000	\$25,000	\$0	\$375,200
Pasadena	\$24,000	\$94,500	\$46,500	\$2,118,500	\$22,200	\$20,000	\$230,728	\$2,662,428
Pico Rivera	\$71,410	\$5,710	\$20,000	\$164,400	\$1,750	\$0	\$57,000	\$921,270
Pomona								
Rancho Palo Verde	\$11,270	\$4,375	\$10,800	\$75,972	\$14,000	\$0	\$15,000	\$137,317
Rancho Beach	\$21,840	\$25,215	\$42,783	\$790,400	\$115,404	\$47,654	\$55,000	\$1,102,125
Rolling Hills	\$25,655	\$3,000	\$5,100	\$0	\$2,040	\$0	\$0	\$31,215

**Program Management**

**SUMMARY OF FISCAL RESOURCES**

Permittee	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
Rolling Hills Estates	\$20,135	\$10,500	\$35,000	\$44,728	\$22,245	\$0	\$0	\$132,597
Rosemead	\$13,500	\$20,000	\$498,000	\$378,000	\$21,000	\$0	\$0	\$980,500
San Dimas	\$3,180	\$13,287	\$5,458	\$129,949	\$9,117	\$0	\$486	\$161,967
San Fernando	\$10,200	\$3,500	\$9,570	\$129,820	\$17,170	\$0	\$2,700	\$160,810
San Gabriel	\$25,000	\$5,000	\$10,000	\$165,000	\$10,000	\$0	\$400,000	\$615,000
San Marino	\$2,800	\$500	\$500	\$89,450	\$100	\$0	\$100	\$93,850
Santa Clarita	\$357,109	\$122,308	\$242,157	\$923,959	\$294,123	\$0	\$902,155	\$2,441,241
Santa Fe Springs	\$80,000	\$10,400	\$15,300	\$237,500	\$222,200	\$0	\$275,000	\$791,400
Santa Monica	\$150,000	\$100,000	\$40,000	\$2,260,000	\$102,500	\$100,000	\$70,000	\$2,852,500
Serra Madre	\$0,000	\$2,750	\$5,150	\$62,450	\$8,120	\$0	\$0	\$77,570
Signal Hill	\$15,500	\$5,300	\$12,840	\$137,400	\$14,200	\$5,000	\$208,000	\$403,300
South El Monte	\$11,000	\$5,500	\$0,100	\$141,000	\$30,120	\$0	\$22,573	\$210,293
South Gate	\$8,890	\$4,600	\$10,900	\$79,350	\$31,510	\$0	\$407,813	\$898,063
South Pasadena	\$72,000	\$343,700	\$180,000	\$517,300	\$27,500	\$5,000	\$0	\$1,185,500
Temple City	\$2,500	\$3,500	\$0	\$127,500	\$5,500	\$0	\$0	\$142,500
Torrance								
Vernon	\$30,573	\$60,310	\$20,434	\$473,484	\$25,348	\$0	\$0	\$603,149
Walnut	\$5,000	\$1,000	\$3,500	\$4,500	\$3,500	\$0	\$0	\$20,000
West Covina	\$187,700	\$0	\$0	\$188,500	\$0	\$0	\$0	\$376,200
West Hollywood	\$16,588	\$27,845	\$13,280	\$210,100	\$98,020	\$0	\$1,645,562	\$1,951,695
Westlake Village	\$42,000	\$2,800	\$5,900	\$50,761	\$18,825	\$27,697	\$0	\$147,183

**Program Management**

**SUMMARY OF FISCAL RESOURCES**

Position	Program Management	IC / ID	Development Planning and Construction	Public Agency Activities	Public Information and Participation	Monitoring Program	Other	Total
Wages	\$40,000	\$9,500	\$0,000	\$122,000	\$10,000	\$0	\$128,000	\$224,000
<b>ORGANO TOTAL</b>	<b>\$10,937,410</b>	<b>\$3,673,010</b>	<b>\$5,051,245</b>	<b>\$104,822,070</b>	<b>\$2,020,442</b>	<b>\$1,908,424</b>	<b>\$2,900,284</b>	<b>\$145,351,613</b>

**Table 5. Number of Active Facilities Covered under the General Industrial Activities Storm Water Permit in Selected Cities**

<b>City</b>	<b>Number of Active Facilities</b>
ARCADIA	3
ARTESIA	3
BELL GARDENS	5
BURBANK	37
CERRITOS	13
COMMERCE	56
COMPTON	54
DOWNEY	19
INDUSTRY	105
LA MIRADA	25
LAKESWOOD	1
LAWNSDALE	1
LOS ANGELES	873
MONROVIA	14
MONTEBELLO	26
NORWALK	8
PARAMOUNT	24
PICO RIVERA	14
POMONA	40
ROSEMEAD	4
SAN GABRIEL	2
SANTA FE SPRINGS	130
SIERRA MADRE	1
SIGNAL HILL	4
SOUTH GATE	56
VERNON	63
WALNUT	8
WHITTIER	23
<b>Grand Total</b>	<b>1,612</b>