

From: Bruce Fujimoto
To: Craig J. Wilson
Date: 8/16/02 3:55PM
Subject: Re: Storm water description

I had thought this would be an easy one to respond to. But... Typically, the MS4 permits require the permittee to develop and implement a Storm Water Management Plan that is intended to reduce pollutant discharged in storm water to the Maximum Extent Practicable. The SWMP is intended to provide the framework for the development and implementation of specific program components, ranging from legal authority, funding, to BMP programs. The permits now require that standards be met, but the mechanism used to meet the standards is the use of ever evolving and "more better" BMPs, which can include structural controls. While all of the permit requirements are enforceable, the Regional Boards have not taken an aggressive position on enforcement, yet. There is more that we should probably talk about.

Bruce

>>> Craig J. Wilson 08/16/02 07:42AM >>>
Bruce,

This is just a very very gentle reminder to give me that description of what a storm water permit contains and its enforceability.

Here's what I'm trying to do: Allow storm water permits to be used to correct trash problems in lieu of developing TMDLs. The case in point is the LA River Trash TMDL. The RB spent an unusual amount of time and effort to develop the TMDL and the only implementation mechanism is the storm water permit. If there is only one permit why not just incorporate the needed provisions to address trash directly into the permit? The TMDL doesn't seem to add anything other than creating the forum for developing the target.

It seems that would save time and effort (but probably not the headaches).

Let's discuss if you wish.

CJW

CC: Jarma Bennett