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Regular Meeting of the California Regional Water Quality Control Board  
Los Angeles Region

**Reopening of the County of Los Angeles Municipal Separate Storm Sewer System Permit  
to include Summer Dry Weather Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL**

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MS4 Permit to incorporate Summer Dry Weather Waste Load Allocations from the Santa  
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Item No. 12

**EXECUTIVE SUMMARY**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins  
Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**



**Executive Summary**  
**California Regional Water Quality Control Board**  
**Los Angeles Region**  
**August 9, 2007**  
**506th Board Meeting**

**Item Number** 12

**Proposed Board Action** Revise the County of Los Angeles Municipal Separate Storm Sewer System (MS4) Permit (NPDES No. CAS004001) to include the summer dry weather waste load allocations (WLAs) for bacteria for jurisdictions discharging to Mothers' Beach (also known as Marina Beach) and Basins D, E, and F of Marina Del Rey Harbor (MDRH).

**Need for Action** The Los Angeles County MS4 permit needs to be modified to include the requirements of the Marina del Rey Harbor Mothers' Beach and Back Basins (MDRH) Bacteria TMDL. According to US EPA, NPDES permits must contain provisions consistent with any available WLAs. The implementation mechanisms identified in the TMDL include the MS4 Permit. Therefore, the dry weather WLAs must be incorporated into the MS4 permit. The Regional Board decided during its adoption of the TMDL that April 2007 was the appropriate timeframe in which to require compliance with the summer dry weather WLAs contained in the MDRH Bacteria TMDL.

The Regional Board adopted a TMDL to address documented bacteriological water quality impairments at Mothers' Beach and Basins D, E, and F in MDRH on August 7, 2003. This bacteria TMDL was adopted to reduce the risk of illness associated with swimming in marine waters contaminated with human sewage and other sources of bacteria. Regionally, it has been estimated that between 627,800 and 1,479,200 excess gastrointestinal illness cases may occur annually among swimmers in Los Angeles County and Orange County beaches as a result of enterococci contaminated waters. The corresponding economic loss annually has been estimated to range from \$21 million to \$51 million. (Regional Public Health Cost Estimates of Contaminated Coastal Waters: A Case Study of Gastroenteritis at Southern California Beaches, Given S., L.H. Pendelton, and A.B. Boehm. Env. Sci. Technol. (2006).)

The TMDL states that the primary regulatory mechanism for implementing the TMDL will be the Los Angeles County MS4 Permit. The proposed changes to the Los Angeles County MS4 Permit are necessary to formally implement the summer dry weather WLAs established in the MDRH Bacteria TMDL through enforceable permit provisions to ensure the protection of recreational beneficial uses.

Based on monitoring data collected pursuant to the Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan, Regional Board staff identified multiple exceedances of the water quality objectives for total and fecal coliform, enterococci and the ratio of fecal-to-total coliform. Since April 1, 2007, there have been 12 exceedance days of the summer dry weather WLAs. Nine of these exceedance days were at Mothers' Beach. A section 13225 and 13267 enforcement letter was sent by the Executive Officer to the jurisdictional group on April 26, 2007 requiring the submittal of information regarding the exceedances at Mothers' Beach; the response is currently under review.

This action is similar to the Regional Board reopener and revision of the LA County MS4 Permit in September 2006 to incorporate the Santa Monica Bay Beaches Bacteria (SMBBB) TMDL summer dry weather WLAs. Although the Marina del Rey watershed is a subwatershed of the Santa Monica Bay watershed, there are separate bacteria TMDLs for the two watershed management areas.

All the responsible agencies under the MDRH Bacteria TMDL are also responsible agencies under the SMBBB TMDL. Therefore, the permit modification does not impose requirements on any new agencies, but only makes requirements that are already applicable to some of the Permittees' discharges to Santa Monica Bay, equally applicable to those agencies' discharges to MDRH. To summarize, the proposed action is identical to the Board's previous action to incorporate the SMBBB summer dry weather WLAs into the LA County MS4 Permit; it simply extends the provisions to the MDRH watershed. To show the similarities between the proposals and the comments received on this proposal and the previous incorporation of the SMBBB summer dry weather WLAs, Regional Board staff have included in the board package the permit findings and provisions, the response to comments, and the

PowerPoint presentation from the September 2006 proceeding.

## **Background Los Angeles County MS4 Permit History**

In 1990, the Regional Board adopted Order No. 90-079, the Los Angeles County MS4 Permit. That permit required the Los Angeles County Flood Control District, the County of Los Angeles, Caltrans, and the incorporated cities in Los Angeles County to implement storm water pollution controls including amending ordinances, optimizing existing pollutant controls such as street sweeping, construction site controls, and others. The Regional Board required all Permittees to implement a minimum list of 13 BMPs for consistency across the County. The 1990 permit was issued on a system wide basis due to the highly interconnected storm drain system serving a population well in excess of 100,000 inhabitants.

On July 15, 1996, the Regional Board adopted Order No. 96-054 that revised the 1990 permit. The 1996 LA County MS4 permit required model programs be developed and implemented by the Permittees for Public Information and Public Participation, Industrial/Commercial Activities, Development Construction, Illicit Connections and Illicit Discharges, Public Agency Activities, and Development Planning. These model programs were intended to be dynamic and expected to change with time, as more information on storm water impacts became available. Following the adoption of Order 96-054, the City of Long Beach submitted a Report of Waste Discharge (ROWD) as an application for its own MS4 permit. The City of Long Beach Municipal Storm Water Permit (Order No. 99-060) was adopted on June 30, 1999. This Order superseded the countywide permit requirements for the City of Long Beach, and the City now operates under its separate MS4 permit. Caltrans' storm water discharges are covered under a separate Statewide NPDES permit.

On January 31, 2001, the Los Angeles County Department of Public Works submitted an application for renewal of their MS4 permit in the form of an ROWD for Los Angeles County and the incorporated cities, except for the City of Long Beach. On December 13, 2001, the LA MS4 Permit was reissued (Order No. 01-182) and is currently in the 6<sup>th</sup> year of the third permit term. On June 12, 2006 Regional Board staff received four separate ROWDs from LA

Permittees to renew the LA MS4 Permit. On September 14, 2006, the LA County MS4 Permit was amended by Order No. R4-2006-0074. Order No. 01-182 as amended by Order R4-2006-0074 expired on December 12, 2006. Pursuant to 40 CFR 122.6, Order 01-182 as amended by Order R4-2006-0074 will remain in effect and enforceable through an administrative extension until a replacement LA County MS4 Permit is adopted by the Regional Board.

**Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL**

The MDRH Bacteria TMDL, which was adopted by the Regional Board on August 7, 2003 and became effective on March 18, 2004, is to be implemented in two phases over a 10-year period, unless an Integrated Water Resources Approach is implemented. The regulatory mechanisms used to implement the TMDL are to include primarily the Los Angeles County Municipal Storm Water NPDES Permit, the California Department of Transportation Storm Water Permit, and the authority vested in the Executive Officer via section 13267 of the Porter-Cologne Water Quality Control Act.

Within 3 years of the effective date of the TMDL (March 18, 2007), summer dry-weather allowable exceedance days, winter dry-weather allowable exceedance days, and the rolling 30-day geometric mean targets must be achieved. Within 10 years of the effective date of the TMDL (March 18, 2007), the wet-weather allowable exceedance days and rolling 30-day geometric mean targets must be achieved, unless an Integrated Water Resources Approach is implemented. In this case, compliance must be achieved in the shortest time possible but not to exceed 18 years from the effective date of the Santa Monica Bay Beaches Bacteria TMDL (July 15, 2006).

**Stakeholder Participation**

The public notice of the Regional Board's proceedings to incorporate the MDRH Bacteria TMDL summer dry weather WLAs into the LA County MS4 Permit was circulated on May 11, 2007. Comments were due by June 25, 2007. The notice stated that the Board would consider the action at its July 12, 2007 Board meeting. The July Board meeting was cancelled due to lack of a quorum and the proposed reopening of the waste discharge requirements for the Los Angeles County MS4 Permit was continued to the August 9, 2007 Board meeting.

**Summary of Commenters**

Regional Board staff received two comment letters, one from the County of Los Angeles and the other a joint letter from Santa Monica Baykeeper and Heal the Bay.

**Proposed Changes and Significant Issues**

Most of the comments made by the County of Los Angeles are similar to those made by the County during the proceeding to incorporate the SMBBB TMDL into the MS4 permit in September of 2006. The comments are simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient. Therefore, staff's responses are not significantly different than the responses from last September. No changes were made to the proposed order language or findings in response to comments. Regional Board staff prepared the attached Response to Comments.

**Alternatives**

The following alternatives were considered by Regional Board staff as means of incorporating the MDRH Bacteria TMDL summer dry weather WLAs into the LA County MS4 Permit.

a. MS4 Unauthorized Non-Storm Water Discharge Prohibition. The LA MS4 Permit includes provisions to effectively prohibit unauthorized non-storm water discharges. Permittees may achieve the effective prohibition by implementing other source control measures or an IC/IDE program to remove unauthorized non-storm water discharges or to get them permitted through the Regional Board's NPDES program.

Given the fact that the proposed action is limited in scope in that it seeks to prohibit discharges during summer dry weather (non-storm water) from MS4s to Mothers' Beach and Basins D, E, and F in MDRH and that compliance is determined by receiving water limitations rather than end-of-pipe limitations, it is a reasonable action by the Regional Board to protect water quality and human health, while considering the burden it imposes on MS4 Permittees in the MDRH watershed. Thus, even if end-of-pipe concentrations exceed receiving water limitations, there is no exceedance unless the discharge causes or contributes to the exceedance of the Receiving Water Limit (RWLs). In essence, the prohibition option does not impose an end-of-pipe water quality based numeric effluent limitation, contrary to arguments raised by many Permittees. Rather, compliance with the bacteria WLAs is determined in the receiving water at the initial point of mixing. New language

has been added to the RWLs section to clarify how compliance with the relevant limitations will be determined.

Under federal law, when a non-numeric water quality based effluent limit is imposed, the permit's administrative record, and fact sheet need to support the approach as sufficient to attain the WLA (See 40 CFR 124.8, 124.9 and 124.18). The Regional Board's administrative record adequately supports the proposed approach as being sufficient to meet the MDRH Bacteria TMDL summer dry weather WLAs.

b. MS4 Storm Water Quality Management Program (SQMP). An MS4 Storm Water Permittee's SQMP is its primary documentation for utilizing the iterative adaptive approach using BMPs or other methods to manage the quality of storm water discharges in order to comply with receiving water limitations. Similarly for non-storm water discharges, the SQMP should have included an effective Illicit Connection/Illicit Discharge Elimination (IC/IDE) program and other source control measures to eliminate non-storm water discharges to the MS4 or to ensure that they are permitted through the Regional Board's NPDES program. The fact that MS4 non-storm water discharges to Marina del Rey Harbor still cause or contribute to exceedances of bacteria receiving water limitations, and that the Regional Board adopted dry weather WLAs for Mothers' Beach and Basins D, E and F of MDRH in 2003, demonstrates the need for greater action and strict enforcement of the WLAs.

c. Combined Non-Storm Water/Storm Water MS4 Permit. An MS4 storm water permit may also cover non-storm water discharges. In that case, both storm water discharges and non-storm water discharges can be included in the same permit (or in multiple permits). The non-storm water discharges will be subject to the existing regulations promulgated for point source non-storm water discharges at 40 CFR 122.44(d). The MS4 was effectively designated a point source by the U.S. Congress in 1987, and thus the MS4 non-storm water discharges that have a reasonable potential to impair the beneficial uses of receiving waters are subject to the stricter of the CWA BAT/BCT technology based controls or water quality based effluent limitations (WQBELs). MS4 storm water discharges are subject to the discretionary provisions of CWA § 402(p). Although not recommended at this time, this continues to remain an option for the Regional Board

when regulating MS4 storm water and non-storm water discharges within a single NPDES permit.

d. Separate Individual Permit for MS4 non-storm water discharges. A separate permit for MS4 non-storm water discharges may be issued, which would require strict compliance with BAT/ BCT technology based controls or WQBELs, whichever is more stringent. It is possible that the Regional Board may elect this approach in the future, as it is required to consider numerical effluent limitations for more non-storm water WLAs for dry weather non-storm water discharges from the MS4 to enforce the WLAs within the NPDES framework.

e. No Action Option. Reopening the LA County MS4 permit to incorporate the MDRH Bacteria TMDL summer dry weather WLAs at this time is a discretionary action. However, given the limited scope of the action, which is to prohibit the discharge to MDRH of summer dry weather flows containing bacteria in excess of Basin Plan objectives, and the economic and health costs associated with non-action or non-enforcement of the MDRH Bacteria summer dry weather WLAs, the proposed action is reasonable and necessary to implement the TMDL WLAs in a timely manner and to ensure protection of Mothers' Beach during summer dry weather. Furthermore, the MDRH Bacteria TMDL required compliance with the summer dry weather WLAs by April 1, 2007, but exceedances continue to occur at Mothers' Beach during summer dry weather.

**Recommendation**

The MDRH TMDL includes similar conditions, assumptions, and requirements as the SMBBB TMDL, and Marina del Rey is a subwatershed of the Santa Monica Bay watershed. The key issue is whether the Board should treat this subwatershed of Santa Monica Bay any differently than the remainder of Santa Monica Bay. Staff recommends that the Board treat summer dry weather discharges to the MDRH subwatershed in the same way as summer dry weather discharges to the rest of the SMB Watershed Management Area. Therefore, Regional Board staff recommends 'Option a'. Consistent with the September 2006 reopener, Option a amends the LA County MS4 permit in a limited manner with revisions to Findings; Part 1. Discharge Prohibitions Section; and Part 2. Receiving Water Limitations Section to incorporate the MDRH Bacteria summer dry weather WLAs. The changes are the

addition of receiving water limitations for bacteria and a prohibition against non-storm water discharges from the MS4 system to Mothers' Beach and Basins D, E, and F in MDRH that result in exceedances of the bacteria receiving water limitations.



Item No. 12

**PROPOSED CHANGES TO FINDINGS**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
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Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**

**[PROPOSED ADDITIONS ARE UNDERLINED AND DELETIONS ARE IN STRIKETHROUGH]****Findings Related To The Incorporation Of The Santa Monica Bay Beaches Dry Weather Bacteria TMDL And The Marina Del Rey Harbor Mothers' Beach And Back Basins Bacteria TMDL**

28. The Regional Board adopted the Santa Monica Bay Beaches Dry Weather TMDL for Bacteria (hereinafter "Dry Weather Bacteria TMDL") on January 24, 2002. The TMDL was subsequently approved by the SWRCB, the Office of Administrative Law (OAL), and the United States Environmental Protection Agency (USEPA) and became effective on July 15, 2003.
29. The Regional Board adopted the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL (hereinafter "MDR Bacteria TMDL") on August 7, 2003. The TMDL was subsequently approved by the SWRCB, the OAL, and the USEPA and became effective on March 18, 2004.
30. The Waste Load Allocations in the Dry Weather Bacteria TMDL and the MDR Bacteria TMDL are expressed as the number of allowable days that the Santa Monica Bay beaches, Mothers' Beach and Basins D, E and F in Marina del Rey Harbor may exceed the Basin Plan water quality objectives for protection of Water Contact Recreation (REC-1) in marine waters, specifically the water quality objectives for bacteria. Appropriate modifications to this order are therefore included in Parts 1 (Discharge Prohibitions) and 2 (Receiving Water Limitations), pursuant to 40 CFR 122.41(f) and 122.62, and Part 6.1.1 of this Order. Additionally, 40 CFR section 122.44(d)(1)(vii)(B) requires that NPDES permits be consistent with the assumptions and requirements of any available waste load allocation. Tables 7-4.1, 7-4.2a, and 7-4.3 of the Basin Plan set forth the pertinent provisions of the Dry Weather Bacteria TMDL. Tables 7-5.1, 7-5.2, and 7-5.3 of the Basin Plan set forth the pertinent provisions of the MDR Bacteria TMDL. They require that during Summer Dry Weather there shall be no exceedances in the Wave Wash of the single sample or the geometric mean bacteria objectives set to protect the Water Contact Recreation (REC-1) beneficial use in marine waters. Accordingly, a prohibition is included in this order barring direct discharges from a MS4 to Santa Monica Bay or Marina del Rey Harbor that result in exceedance of these objectives. Since the TMDL and the waste load allocations contained therein are expressed as receiving water conditions, Receiving Water Limitations have been included in this order that are consistent with and implement the zero exceedance day waste load allocations.
31. Pursuant to Federal Regulations at 40 CFR 124.8, and 125.56, a Fact Sheet ~~was~~ prepared to provide the bases basis for incorporating the Dry Weather Bacteria TMDL and the MDR Bacteria TMDL into this Order. These Fact Sheets ~~are~~ hereby incorporated by reference into these findings.
32. The iterative approach to regulating municipal storm water is not an appropriate means of implementing the SMB or the MDR Summer Dry Weather WLAs for any and all of the following reasons: (a) The WLAs do not regulate the discharge of storm water; (b) The harm to the public from violating the WLAs is dramatic both in terms of health impacts to exposed beachgoers, and the economic cost to

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the region associated with related illnesses; (c) Despite the fact that more than a decade and a half has passed since MS4 permittees were required to eliminate illicit connections/discharges (IC/ID) into their MS4s, their programs have not eliminated standards violations at the beaches; and (d) Few permittees have ever documented revisions to their SQMP to address chronic exceedances of water quality standards.

33. The Receiving Water Limitations have been revised to implement the Summer Dry Weather waste load allocations set forth in Basin Plan Tables 7-4.1 (~~attached as Appendix A to this order~~) and 7-5.1. These Receiving Water Limitations apply at the compliance monitoring sites identified in the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* dated April 7, 2004<sup>1</sup> and the *Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan* dated April 13, 2007. Compliance with the Receiving Water Limitations shall be determined using shoreline monitoring data obtained in conformance with the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* dated April 7, 2004; the *Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan* dated April 13, 2007; and the Monitoring and Reporting Program CI 6948.
34. If the Receiving Water Limitations are exceeded at a compliance monitoring site, the Regional Board will generally issue an appropriate investigative order pursuant to Cal. Water Code § 13267 or § 13225 to the Permittees and other responsible agencies or jurisdictions within the relevant subwatershed to determine the source of the exceedance. Following these actions, Regional Board staff will generally evaluate the need for further enforcement as follows:
- a) If the Regional Board determines that the exceedance did not result from discharges from the MS4, then the MS4 Permittees would not be responsible for violations of these provisions.
  - b) If the Regional Board determines that Permittees in the relevant subwatershed have demonstrated that their MS4 does not discharge dry weather flow into Santa Monica Bay or Basins D, E, and F in Marina del Rey Harbor, those Permittees would not be responsible for violations of these provisions even if the Receiving Water Limitations are exceeded at an associated compliance monitoring site.
  - c) If the Regional Board determines that Permittees in the relevant subwatershed have demonstrated that their MS4 summer dry weather discharge into Santa Monica Bay or Basins D, E, and F in Marina del Rey Harbor is treated to a level that does not exceed either the single sample or the geometric mean bacteria objectives, those Permittees shall not be responsible for violations of these provisions even if the Receiving Water Limitations are exceeded at an associated compliance monitoring site.

<sup>1</sup> If the Regional Board determines that publicly owned storm drains that flow during dry weather are situated at additional shoreline locations, the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* may be revised by the Regional Board Executive Officer approval, after providing the opportunity for public comment, to include these locations as compliance monitoring sites.

d) If the Regional Board determines that one or more Permittees have caused or contributed to violations of these Receiving Water Limitations, the Regional Board will consider appropriate enforcement action, including a cease and desist order with or without a time schedule for compliance, or other appropriate enforcement action depending upon the circumstances and the extent to which the Permittee(s) has endeavored to comply with these provisions.

35. A Permittee would not be responsible for violations of these provisions if the Executive Officer determines that the Permittee has adequately documented through a source investigation of the subwatershed, pursuant to protocols established under Cal. Water Code 13178, that bacterial sources originating within the jurisdiction of the Permittee have not caused or contributed to the exceedance of the Receiving Water Limitations.

36. Water Code section 13389 exempts the Regional Board from compliance with Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code prior to the adoption of waste discharge requirements. Therefore the Regional Board is not required to prepare environmental documents to evaluate this permit modification. Nevertheless, the Regional Board has considered the policies and requirements set forth in Chapters 1 through 2.6 of CEQA, and further, has considered the final substitute environmental documents for the Santa Monica Bay Beaches Bacteria TMDL and the MDR Bacteria TMDL.

F. Implementation

1. The California Environmental Quality Act (CEQA) (Cal. Pub. Resources Code § 21000 *et seq.*) requires that public agencies consider the environmental impacts of the projects they approve for development. CEQA applies to projects that are considered discretionary and does not apply to ministerial projects, which involve the use of established standards or objective measurements. A ministerial project may be made discretionary by adopting local ordinance provisions or imposing conditions to create decision-making discretion in approving the project. In the alternative, Permittees may establish standards and objective criteria administratively for storm water mitigation for ministerial projects. For water quality purposes, the Regional Board considers that all new development and significant redevelopment activity in specified categories, that receive approval or permits from a municipality, are subject to storm water mitigation requirements.
2. The objective of this Order is to protect the beneficial uses of receiving waters in Los Angeles County. To meet this objective, this Order requires that the SQMP specify BMPs that will be implemented to reduce the discharge of pollutants in storm water to the maximum extent practicable. Further, Permittees are to assure that storm water discharges from the MS4 shall neither cause nor contribute to the exceedance of water quality standards and objectives nor create conditions of nuisance in the receiving waters, and that the discharge of non-storm water to the MS4 has been effectively prohibited.
3. The SQMP required in this Order builds upon the programs established in Order Nos. 90-079, and 96-054, consists of the components recommended in the

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USEPA guidance manual, and was developed with the cooperation of representatives from the regulated community and environmental groups. The SQMP includes provisions that promote customized initiatives, both on a countywide and watershed basis, in developing and implementing cost-effective measures to minimize discharge of pollutants to the receiving water. The various components of the SQMP, taken as a whole rather than individually, are expected to reduce pollutants in storm water and urban runoff to the maximum extent practicable. Provisions of the SQMP are fully enforceable under provisions of this Order.

- 4. The emphasis of the SQMP is pollution prevention through education, public outreach, planning, and implementation as source control BMPs first and then Structural and Treatment Control BMPs next. Successful implementation of the provisions of the SQMP will require cooperation and coordination of all public agencies in each Permittee's organization, among Permittees, and with the regulated community.

[PERMIT LANGUAGE CONTINUES AS ADOPTED IN ORDER NO. 01-182 AS AMENDED BY ORDER NO. R4-2006-0074]

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**Item No. 12**

**PROPOSED CHANGES TO ORDER LANGUAGE  
EXCEPT FINDINGS**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
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Permit  
(NPDES permit No. CAS004001)**

**[PROPOSED ADDITIONS ARE UNDERLINED AND DELETIONS ARE IN STRIKETHROUGH]**

State Water Resources Control Board, P.O. Box 100, Sacramento, California, 95812, within 30 days of adoption of the Order by the Regional Board.

8. This Order may be modified or alternatively revoked or reissued prior to its expiration date, in accordance with the procedural requirements of the NPDES program, and the CWC for the issuance of waste discharge requirements.

**IT IS HEREBY ORDERED** that the Los Angeles County Flood Control District, Los Angeles County, and the Cities of Agoura Hills, Alhambra, Arcadia, Artesia, Azusa, Baldwin Park, Bell, Bellflower, Bell Gardens, Beverly Hills, Bradbury, Burbank, Calabasas, Carson, Cerritos, Claremont, Commerce, Compton, Covina, Cudahy, Culver City, Diamond Bar, Downey, Duarte, El Monte, El Segundo, Gardena, Glendale, Glendora, Hawaiian Gardens, Hawthorne, Hermosa Beach, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Cañada Flintridge, La Habra Heights, Lakewood, La Mirada, La Puente, La Verne, Lawndale, Lomita, Los Angeles, Lynwood, Malibu, Manhattan Beach, Maywood, Monrovia, Montebello, Monterey Park, Norwalk, Palos Verdes Estates, Paramount, Pasadena, Pico Rivera, Pomona, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Santa Monica, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, West Hollywood, Westlake Village, and Whittier, in order to meet the provisions contained in Division 7 of the CWC and regulations adopted thereunder, and the provisions of the CWA, as amended, and regulations and guidelines adopted thereunder, shall comply with the following:

**Part 1. DISCHARGE PROHIBITIONS**

Part 1. A. The Permittees shall effectively prohibit non-storm water discharges into the MS4 and watercourses, except where such discharges:

1. Are covered by a separate individual or general NPDES permit for non-storm water discharges; or
2. Fall within one of the categories below, and meet all conditions when specified by the Regional Board Executive Officer:
  - a) Category A - Natural flow:
    - (1) Natural springs and rising ground water;
    - (2) Flows from riparian habitats or wetlands;
    - (3) Stream diversions, permitted by the State Board; and
    - (4) Uncontaminated ground water infiltration [as defined by 40 CFR 35.2005(20)].
  - b) Category B - Flows from emergency fire fighting activity.

December 13, 2001 (Amended on September 14, 2006 by Order R4-2006-0074 and on XXX XX, 2007 by Order R4-2007-XXXX)

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- c) Category C - Flows incidental to urban activities:
- (1) Reclaimed and potable landscape irrigation runoff;
  - (2) Potable drinking water supply and distribution system releases (consistent with American Water Works Association guidelines for dechlorination and suspended solids reduction practices);
  - (3) Drains for foundations, footings, and crawl spaces;
  - (4) Air conditioning condensate;
  - (5) Dechlorinated/debrominated swimming pool discharges;
  - (6) Dewatering of lakes and decorative fountains;
  - (7) Non-commercial car washing by residents or by non-profit organizations; and
  - (8) Sidewalk rinsing.

The Regional Board Executive Officer may add or remove categories of non-storm water discharges above. Furthermore, in the event that any of the above categories of non-storm water discharges are determined to be a source of pollutants by the Regional Board Executive Officer, the discharge will no longer be exempt from this prohibition unless the Permittee implements conditions approved by the Regional Board Executive Officer to ensure that the discharge is not a source of pollutants. Notwithstanding the above, the Regional Board Executive Officer may impose additional prohibitions of non-storm water discharges in consideration of antidegradation policies and TMDLs.

Part 1. B. Discharges of Summer Dry Weather<sup>4</sup> flows from MS4s into Santa Monica Bay<sup>12</sup> or into Marina del Rey Harbor Basins D, E, or F, including Mothers' Beach, that cause or contribute to exceedances of the bacteria Receiving Water Limitations in Part 2.5 and 2.6 below, are prohibited.<sup>3</sup>

## Part 2. RECEIVING WATER LIMITATIONS

1. Except as provided in Part 2.5 and 2.6 below, discharges from the MS4 that cause or contribute to the violation of Water Quality Standards or water quality objectives are prohibited.

<sup>4</sup> ~~Dry Weather shall be determined as set forth in the Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan dated April 7, 2004, or any amendments thereto.~~

<sup>12</sup> Santa Monica Bay encompasses the coastal waters from Point Dume to Point Fermin and seaward to the 500-meter depth contour. It includes all beaches from the Los Angeles/Ventura County line south to the Outer Cabrillo Beach located just south of the Palos Verdes Peninsula.

<sup>23</sup> Responsibility for such prohibited discharges is determined as indicated in Footnote 3 part (23) of Table 7-4.1 and Footnote 2 part (1) of Table 7-5.1 of the Basin Plan. All Permittees within a subwatershed of the Santa Monica Bay Watershed Management Area are jointly responsible for compliance with the limitations imposed in Tables 7-4.1 and 7-5.1 of the Basin Plan.

December 13, 2001 (Amended on September 14, 2006 by Order R4-2006-0074 and on XXX XX, 2007 by Order R4-2007-XXXX)

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2. Discharges from the MS4 of storm water, or non-storm water, for which a Permittee is responsible for, shall not cause or contribute to a condition of nuisance.
3. The Permittees shall comply with Part 2.1. and 2.2. through timely implementation of control measures and other actions to reduce pollutants in the discharges in accordance with the SQMP and its components and other requirements of this Order including any modifications. The SQMP and its components shall be designed to achieve compliance with receiving water limitations. If exceedances of Water Quality Objectives or Water Quality Standards (collectively, Water Quality Standards) persist, notwithstanding implementation of the SQMP and its components and other requirements of this permit, the Permittee shall assure compliance with discharge prohibitions and receiving water limitations by complying with the following procedure:
  - a) Upon a determination by either the Permittee or the Regional Board that discharges are causing or contributing to an exceedance of an applicable Water Quality Standard, the Permittee shall promptly notify and thereafter submit a Receiving Water Limitations (RWL) Compliance Report (as described in the Program Reporting Requirements, Section I of the Monitoring and Reporting Program) to the Regional Board that describes BMPs that are currently being implemented and additional BMPs that will be implemented to prevent or reduce any pollutants that are causing or contributing to the exceedances of Water Quality Standards. This RWL Compliance Report may be incorporated in the annual Storm Water Report and Assessment unless the Regional Board directs an earlier submittal. The RWL Compliance Report shall include an implementation schedule. The Regional Board may require modifications to the RWL Compliance Report.
  - b) Submit any modifications to the RWL Compliance Report required by the Regional Board within 30 days of notification.
  - c) Within 30 days following the approval of the RWL Compliance Report, the Permittee shall revise the SQMP and its components and monitoring program to incorporate the approved modified BMPs that have been and will be implemented, an implementation schedule, and any additional monitoring required.
  - d) Implement the revised SQMP and its components and monitoring program according to the approved schedule.
4. So long as the Permittee has complied with the procedures set forth above and implementing the revised SQMP and its components, the Permittee does not have to repeat the same procedure for continuing or recurring exceedances of the same receiving water limitations unless directed by the Regional Board to develop additional BMPs.

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5. During Summer Dry Weather there shall be no discharges of bacteria from MS4s into the Santa Monica Bay that cause or contribute to exceedances in the Wave Wash, of the applicable bacteria objectives. The applicable bacteria objectives include both the single sample and geometric mean bacteria objectives set to protect the Water Contact Recreation (REC-1) beneficial use, as set forth in the Basin Plan.<sup>34</sup>
6. During Summer Dry Weather there shall be no discharges of bacteria from MS4s into Marina del Rey Harbor Basins D, E, or F, including Mothers' Beach that cause or contribute to exceedances of the applicable bacteria objectives. The applicable bacteria objectives include both the single sample and geometric mean bacteria objectives set to protect the Water Contact Recreation (REC-1) beneficial use, as set forth in the Basin Plan.<sup>45</sup>

Part 3. STORM WATER QUALITY MANAGEMENT PROGRAM (SQMP) IMPLEMENTATION

A. General Requirements

1. Each Permittee shall, at a minimum, implement the SQMP. The SQMP is an enforceable element of this Order. The SQMP shall be implemented no later than February 1, 2002, unless a later date has been specified for a particular provision in this Order.
2. The SQMP shall, at a minimum, comply with the applicable storm water program requirements of 40 CFR 122.26(d)(2). The SQMP and its components shall be implemented so as to reduce the discharges of pollutants in storm water to the MEP.
3. Each Permittee shall implement additional controls, where necessary, to reduce the discharges of pollutants in storm water to the MEP.
4. Permittees that modify the countywide SQMP (i.e., implement additional controls, implement different controls than described in the countywide SQMP, or determine that certain BMPs in the countywide SQMP are not applicable in the area under its jurisdiction), shall develop a local SQMP, no later than August 1, 2002. The local SQMP shall be customized to reflect the conditions in the area under the Permittee's jurisdiction and shall specify activities being implemented under the appropriate elements described in the countywide SQMP.

[PERMIT LANGUAGE CONTINUES AS ADOPTED IN ORDER 01-182 AS AMENDED BY ORDER NO. R4-2006-0074]

<sup>34</sup> Samples collected for determining compliance with the receiving water limitations of Part 2.5 shall be processed in accordance with the sampling procedures and analytical methodology set forth in the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* dated April 7, 2004 and the *Monitoring and Reporting Program CI 6948*.

<sup>45</sup> Samples collected for determining compliance with the receiving water limitations of Part 2.6 shall be processed in accordance with the sampling procedures and analytical methodology set forth in the *Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan* dated April 13, 2007 and the *Monitoring and Reporting Program CI 6948*.

December 13, 2001 (Amended on September 14, 2006 by Order R4-2006-0074 and on XXX XX, 2007 by Order R4-2007-XXXX)

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Item No. 12

**SUMMARY OF PROPOSED DELETIONS**  
(Explanation of deletions to Order No. 01-182 as amended by  
Order R4-2006-0074)

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins  
Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**

## SUMMARY OF PROPOSED DELETIONS

(Proposed additional language is underlined.

Proposed deleted language is shown in ~~strike through~~ format.)

### Proposed Deletion #1:

Delete the phrase "(attached as Appendix A to this order)" in Finding No. 32 on page 14 of the LA MS4 Permit.

Reason: The reference is redundant Table 7-4.1 is in the Basin Plan and does not need to be included as an attachment to this order.

### Proposed Deletion #2:

Delete the word "shoreline" in Finding No. 32 on page 14 of the LA MS4 Permit.

Reason: Monitoring data collected by the Permittees must be consistent with the SMB Coordinated Monitoring Plan, the MDR Coordinated Monitoring Program, as well as the Monitoring and Reporting Program for this order.

32. The Receiving Water Limitations have been revised to implement the Summer Dry Weather waste load allocations set forth in Basin Plan Tables 7-4.1 (~~attached as Appendix A to this order~~) and 7-5.1. These Receiving Water Limitations apply at the compliance monitoring sites identified in the Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan dated April 7, 2004<sup>1</sup> and the Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan dated April 13, 2007. Compliance with the Receiving Water Limitations shall be determined using shoreline monitoring data obtained in conformance with the Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan dated April 7, 2004; the Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan dated April 13, 2007; and the Monitoring and Reporting Program CI 6948.

### Proposed Deletion #3:

Delete the Footnote #1 in Part 1.B. on page 17 of the LA MS4 Permit.

Reason: This footnote is duplicative because "Dry Weather" is defined under Part 5. Definitions on page 59 of the LA MS4 Permit.

~~<sup>1</sup> Dry Weather shall be determined as set forth in the Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan dated April 7, 2004, or any amendments thereto.~~

### Proposed Deletion #4:

Delete the number "3" and replace it with the number "2" in Footnote #3 in Part 1.B. on page 17 of the LA MS4 Permit.

Reason: This deletion and addition is made to correct a typographical error.

<sup>3</sup> Responsibility for such prohibited discharges is determined as indicated in Footnote 3 part (~~2~~<sup>3</sup>) of Table 7-4.1 of the Basin Plan. All Permittees within a subwatershed of the Santa Monica Bay Watershed Management Area are jointly responsible for compliance with the limitations imposed in Table 7-4.

May 11, 2007

Item No. 12

**FACT SHEET**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins  
Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD,

LOS ANGELES REGION  
320 W. 4<sup>TH</sup> STREET  
SUITE 200  
LOS ANGELES, CA 90013

**FACT SHEET**

SUPPORTING THE  
AMENDMENTS TO THE LOS ANGELES COUNTY  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(ORDER NO. 01-182 AS AMENDED BY ORDER NO. R4-2006-0074;  
NPDES PERMIT NO. CAS004001) TO  
INCORPORATE SUMMER DRY WEATHER WASTE LOAD  
ALLOCATIONS FOR BACTERIA PURSUANT TO THE  
MARINA DEL REY HARBOR MOTHERS' BEACH AND BACK BASINS  
BACTERIA TMDL

**Summary of Proposed Action**

The Los Angeles Regional Water Quality Control Board (LA Water Board) staff proposes a limited reopening of the LA County Municipal Separate Storm Sewer System (MS4) Permit to incorporate the Marina del Rey Harbor Mothers' Beach<sup>1</sup> and Back Basins Bacteria (MDR Bacteria) Total Maximum Daily Load (TMDL) Waste Load Allocations (WLAs) for summer dry weather discharges from MS4 outfalls to Marina del Rey Harbor (MDRH). The LA Water Board adopted the MDR Bacteria TMDL in 2003 Resolution No. 2003-012. This TMDL was subsequently approved by the State Water Resources Control Board Resolution No. 2003-0072, Office of Administrative Law, and the United States Environmental Protection Agency and became effective on March 18, 2004. This TMDL required compliance with the summer dry weather WLAs and winter dry weather WLAs by March 18, 2007. The compliance deadline for the wet weather

<sup>1</sup> Mothers' Beach is referred to as Marina Beach in the *Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan* and the *Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL Dry- and Wet-Weather Implementation Plan*.

WLAs is March 18, 2014 or if an integrated water resources approach is implemented then the compliance deadline is no later than July 15, 2021.

The WLAs for winter dry weather discharges from MS4 outfalls to MDRH will not be incorporated into the MS4 permit at this time. The Regional Board will be reconsidering the MDR Bacteria TMDL in the fall of 2007. The Regional Board expects to reconsider the allowable exceedances days during winter dry weather and wet weather based on a re-evaluation of site-specific variability; the reference system selected to calculate allowable exceedance levels; and the reference year selected to calculate the allowable exceedance days. Based on this reconsideration the winter dry weather WLAs may be revised. Therefore, it is not prudent to incorporate the winter dry weather WLAs into the MS4 Permit at this time.

The summer dry weather period (April 1 to October 31) is the highest period of beach use. A recent study estimated that there is a substantial economic and public health cost associated with swimming in waters contaminated with bacteria (*Regional Public Health Cost Estimates of Contaminated Coastal Waters: A Case Study of Gastroenteritis at Southern California Beaches*; Given S., L.H. Pendelton, and A.B. Boehm. *Env. Sci. Technol.* (2006)). The MDR Bacteria summer dry weather WLAs will be incorporated as receiving water limitations and a supporting prohibition on discharges that are inconsistent with the limits. The LA County MS4 Permit already prohibits discharges that cause or contribute to the exceedance of water quality standards. The proposed changes make more specific the permit provisions, as they relate to discharges of bacteria that could affect Mothers' Beach and the back basins of Marina del Rey Harbor during summer dry weather. The proposed changes will make the MDR Bacteria summer dry weather WLAs a provision of the LA County MS4 Permit.

The proposed changes will affect the County of Los Angeles, the Los Angeles County Flood Control District, and the Cities of Los Angeles and Culver City. The California Department of Transportation (Caltrans) owns or operates storm drains that discharge or are tributary to Marina del Rey Harbor. Therefore, Caltrans is also subject to the MDR Bacteria summer dry weather WLAs. Caltrans MS4 discharges are covered by a statewide storm water discharge permit (NPDES No. CAS000003) issued by the State

Water Board, which expired on July 15, 2004. The LA Water Board will notify the State Water Board that it will need to incorporate all adopted TMDL WLAs for the LA Region that apply to Caltrans when the storm water permit is reissued, and to include provisions to ensure compliance, including the prohibition against the discharge of bacteria in excess of water quality objectives for protection of REC-1 to Mothers' Beach and Basins D, E and F in Marina del Rey Harbor during summer dry weather.

On September 14, 2006, the LA Water Board amended the LA County MS4 Permit to incorporate the Santa Monica Bay (SMB) Beaches Bacteria TMDL WLAs for summer dry weather. Although the Marina del Rey Watershed is a subwatershed of the Santa Monica Bay Watershed, there are separate Bacteria TMDLs for each because of MDRH's unique characteristics as an enclosed bay. However, all of the responsible agencies under the MDR Bacteria TMDL are also responsible agencies under the SMB Beaches Bacteria TMDL. The proposed action is identical to the Board's previous action to incorporate the SMB Beaches Bacteria summer dry weather WLAs into the LA County MS4 Permit; it simply extends the provisions to the MDR Watershed.

The reopener provisions in Part 6.1.1 identify the authority and procedures for the Board to modify the permit. The proposed consideration by the LA Water Board to incorporate the MDR Bacteria TMDL summer dry weather WLAs complies with these provisions. The MDR Bacteria TMDL requires compliance with the summer dry weather WLAs by April 1, 2007. This limited reopener of the MS4 Permit to incorporate the summer dry weather WLAs allows the timely enforcement of these WLAs during the summer months, when beach usage is at its highest and the risk to public health from non-compliance with the WLAs is greatest.

The LA Water Board staff is proposing a limited reopener instead of reissuing the MS4 Permit at this time in order to expedite the inclusion of the MDR Bacteria summer dry weather WLAs, and ensure that the TMDL's terms are enforced as required by the Basin Plan's relevant provisions. Presently, the format of the LA Water Board's MS4 permit is being redesigned. The new format is being vetted in the Ventura County Municipal Storm Water NPDES Permit (Board Order No. 00-108; NPDES Permit No. CAS004002), which is currently in the process of reissuance. The Los Angeles MS4



Permit will be reissued following the Ventura Permit. That will not occur until 2008, and therefore, waiting until permit reissuance would prevent implementation of the TMDL's regulatory requirements until more than a year after compliance is to occur. Moreover, the permit modification does not impose requirements on any new agencies, but only makes requirements that are already applicable to some of the Permittees for SMB Beaches discharges, equally applicable to those agencies' discharges to MDRH. Therefore, the LA Water Board is reopening the existing permit during its administrative extension, instead of reissuing the permit at this time.

### **Statutory History**

The federal Clean Water Act (CWA) generally prohibits the "discharge of any pollutant," 33 U.S.C. § 1311(a), from a "point source" into the navigable waters of the United States. 33 U.S.C. § 1362(12)(A). An entity can, however, obtain a National Pollutant Discharge Elimination System (NPDES) permit that allows conditionally for the discharge of some pollutants. 33 U.S.C. § 1342(a)(1). The CWA defines point sources as "discernible, confined and discrete conveyances, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure" such as a pipe, ditch, container, rolling stock, concentrated animal feeding operation, landfill leachate collections system, vessel or other floating craft from which pollutants are or may be discharged. 33 U.S.C. § 1362; 40 CFR 122.2.

In 1987, the U.S. Congress enacted the Water Quality Act recognizing both the environmental threats posed by storm water runoff and the U.S. EPA's problems in implementing regulations for storm water discharges (NRDC II, 966 F.2d at 1296). These Amendments to the CWA established new statutory requirements to control industrial and municipal storm water discharges to waters of the United States (CWA § 402(p).)

The amendments require NPDES permits for storm water discharges from Municipal Separate Storm Sewer Systems (MS4s) to waters of the United States, and the MS4 was designated a "point source". The storm water discharge permits for MS4s (i) may

be issued on a system- or jurisdiction-wide basis; (ii) shall include a requirement to effectively prohibit [unauthorized] non-storm water discharges into the storm sewers; and (iii) shall require controls to reduce the discharge of pollutants from storm water to the maximum extent practicable, including management practices, control techniques and systems, design and engineering methods, and such other provisions as the Administrator or the State determines appropriate for the control of such pollutants. (See CWA §402(p) (3) (B)).

Ordinarily, an NPDES permit imposes [numerical] effluent limitations on such discharges. See 33 U.S.C. § 1342(a)(1) (incorporating effluent limitations found in 33 U.S.C. § 1311). First, a permit-holder "shall . . . achiev[e] . . . effluent limitations . . . which shall require the application of the best practicable control technology [BPT] currently available." 33 U.S.C. § 1311(b)(1)(A). Second, a permit-holder "shall achiev[e] . . . any more stringent limitation, including those necessary to meet water quality standards, treatment standards or schedules of compliance, established pursuant to any State law or regulations (under authority preserved by section 1370 of this title)." 33 U.S.C. § 1311(b)(1)(C). In the case of MS4 NPDES discharge permits, federal courts have ruled that the U.S. EPA has the discretionary authority under "33 U.S.C. § 1342(p)(2)(E) to determine that ensuring strict compliance with state water-quality standards is necessary to control pollutants, or to require less than strict compliance with state water-quality standards, such as a BMP approach" (*Defenders of Wildlife v. Browner*, 191 F.3d 1159 (9<sup>th</sup> Cir., 1999)). Under 33 U.S.C. § 1342(p)(3)(B)(iii), the U.S. EPA has the choice to include either best management practices or numeric limitations in the permits. *NRDC II*, 966 F.2d at 1308 ("Congress did not mandate a minimum standards approach or specify that [the] EPA develop minimal performance requirements.").

### Regulatory Scheme

On November 16, 1990, pursuant to CWA § 402(p), the U.S. EPA promulgated regulations at 40 CFR 122.26 which established requirements for storm water discharges under the NPDES program. The U.S. EPA defines storm water at 40 CFR

122.26 (b)(13) as 'storm water runoff, snow melt runoff, and surface runoff and drainage' [related to storm events or snow melt] (55 Fed. Reg. 47990, 47995). Non-storm water discharges to the MS4 are to be "effectively prohibited" by the MS4 operator. "Effective prohibition" meant that the MS4 Permittee was to implement programs to eliminate "illicit discharges" to the storm drain system unless authorized under NPDES permits issued independent of the MS4 permit (55 Fed. Reg. 47995). The storm water regulations also intended not to hold MS4 Permittees responsible for certain categories of non-storm water discharges, such as uncontaminated ground water infiltration, natural springs, rising groundwater, stream and diversions, from the MS4. Such discharges might need to be addressed under independent NPDES permits when specifically identified on a case-by case basis by the MS4 Permittee or the permitting authority.

The U.S. EPA intended that storm water discharges from the MS4 be primarily addressed through the implementation of BMPs on an iterative approach because of the intermittent and variable nature of storm flows and pollutant concentrations as well as insufficient data rather than numerical effluent limitations (61 FR 43761). However, the U.S. EPA's scheme for non-storm water discharges from the MS4 is to bring them under the existing framework of the NPDES program at 40 CFR 122.44(d). (55 Fed. Reg. 47995). Non-numerical limitations such as BMPs for non-storm water discharges may be authorized only where numerical limits are not feasible (40 CFR 122.44(k)). In any case, if the Permittee fails to implement adequate BMPs to prevent exceedance of the receiving water objectives, the permitting authority "may have to consider other approaches to water quality protection" (61 Fed. Reg. 43761; *Interim Permitting Approach*, Response #6, EPA 833-D-96-00, 1996).

The CWA §303(d)(1)(A) requires each State to conduct a biennial assessment of its waters, and identify those waters that are not achieving water quality standards. The resulting list is referred to as the 303(d) list. The CWA also requires States to establish a priority ranking for waters on the 303(d) list of impaired waters and to develop and implement TMDLs for these waters. A TMDL specifies the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards, and allocates the acceptable pollutant load to point and nonpoint sources. The elements of

a TMDL are described in 40 CFR 130.2 and 130.7. A TMDL is defined as "the sum of the individual waste load allocations for point sources and load allocations for nonpoint sources and natural background" (40 CFR 130.2). Regulations further require that TMDLs must be set at "levels necessary to attain and maintain the applicable narrative and numeric water quality standards with seasonal variations and a margin of safety that takes into account any lack of knowledge concerning the relationship between effluent limitations and water quality" (40 CFR 130.7 (c) (1)). The regulations at 40 CFR 130.7 also state that TMDLs shall take into account critical conditions for stream flow, loading and water quality parameters. The U.S. EPA has issued guidance for establishing WLAs for storm water discharges in TMDLs and their incorporation as numerical limitations in MS4 Storm Water Permits (U.S. EPA Office of Water Memo, *Establishing Total Maximum Daily Load Wasteload Allocations for Storm Water Sources and NPDES Permit Requirements Based on those WLAs*, Nov 22, 2002 Memo).

Since provisions in NPDES permits must reflect the assumptions and requirements of available TMDLs (40 CFR 122.44 (d)(1)(vii)(B)), the NPDES permit must incorporate the WLAs as either BMPs (reasonably expected to achieve the WLAs when implemented and properly maintained), under specified circumstances (40 CFR 122.44(k)(2) & (3)), or as a Water Quality Based Limitation (WQBEL) expressed numerically. Where a non-numeric effluent limitation is selected, the permit's administrative record must support the expectation that the BMPs are sufficient to achieve the WLAs. (40 CFR 124.8, 124.9, and 124.18.) The guidance, however, does not address non-storm water discharges from an MS4.

### **State Regulatory Authority and Permit History**

The State of California is one of forty-five States with duly delegated authority under the CWA to implement the NPDES permitting program. The Porter-Cologne Water Quality Control Act (California Water Code) authorizes the State Board, through the nine regional boards, to issue NPDES permits, and regulate and control the discharge of pollutants into waters of the State. To comply with the CWA, the Los Angeles Regional Water Board (LA Water Board) issued the first storm water permit ("predecessor

permit") on June 18, 1990, to the municipalities (Permittees) in Los Angeles County (Order No. 90-079; NPDES Permit No. CA0061654). The LA County MS4 Permit was reissued in 1996, and the current iteration of the permit was adopted on December 13, 2001 (Order No. 01-182; NPDES Permit No. CAS004001).

On June 12, 2006, a Report of Waste Discharge was submitted as the Los Angeles County Municipal Stormwater application for renewal of waste discharge requirements adopted in Order 01-182. On September 14, 2006, the LA County MS4 Permit (Order No. 01-182) was amended by Order No. R4-2006-0074. Order No. 01-182 as amended by Order R4-2006-0074 expired on December 12, 2006. Pursuant to 40 CFR 122.6, Order 01-182 as amended by Order R4-2006-0074 will remain in effect and enforceable until a replacement LA County MS4 Permit is adopted by the LA Water Board.

Because of the complexity and networking of the storm drain system and drainage facilities within and tributary to the County of Los Angeles, the LA Water Board adopted a countywide approach in permitting storm water and urban runoff discharges. The permit requires Permittees to conduct monitoring and to implement programs in the areas of public involvement and participation, industrial/commercial inspection, development planning, development construction, public agency activities, and to reduce the discharge of pollutants in storm water to the Maximum Extent Practicable (MEP) from the permitted areas in the County of Los Angeles to the waters of the U.S. In addition, Permittees are required to effectively prohibit the discharge of unauthorized non-storm water into the MS4 by implementing a program to detect and eliminate illicit discharges/illicit connections to the MS4.

The LA County MS4 Permit requires Permittees to develop, and implement a timely, comprehensive, cost-effective storm water pollution control program to reduce the discharge of pollutants in storm water to the Maximum Extent Practicable (MEP) to the waters of the U.S. In addition, it states that discharges from the MS4 to waters of the U.S. (which includes Marina del Rey Harbor) are required to meet water quality standards. Upon establishment of TMDLs by the State or the U.S. EPA, the State is required to incorporate the TMDLs into the State Water Quality Management Plan (40 CFR 130.6 (c) (1), 130.7). The Water Quality Control Plan for the Los Angeles Region

(Basin Plan), and applicable statewide plans, serves as the State Water Quality Management Plan governing the watersheds under the jurisdiction of the LA Water Board. LA Water Board-issued NPDES permits must contain provisions consistent with the State Water Quality Management Plan.

### **TMDL History**

The LA Water Board adopted the MDR Bacteria TMDL, including WLAs, to address documented bacteriological water quality impairments at Mothers' Beach and Basins D, E, and F in Marina del Rey Harbor. The WLAs for bacteria during summer dry weather (April 1 to October 31) for the LA County MS4 Permittees that discharge to Marina del Rey Harbor are set at zero allowable exceedance days of the single sample bacteria objectives at each sampling location for the protection of public health. The WLAs, expressed as exceedance days of the single sample bacteria objectives, for each sampling location during winter dry weather (November 1 to March 31) are specified in Basin Plan Table 7-5.2. No exceedances of the geometric mean bacteria objectives are allowed during summer or winter dry weather under the MDR Bacteria TMDL. Winter dry weather bacteria WLAs are not considered for inclusion at this time because of the pending reconsideration of the MDR Bacteria TMDL, which is scheduled to take place in the fall of 2007. Dry weather is defined in the TMDL as those days with less than 0.1 inch of rainfall, and more than three days after a rain day (consistent with the 72-hour period used by the County Department of Health Services to post beaches with rain advisories). The TMDL defines rain days as those days with greater than or equal to 0.1 inch of rainfall. (One-tenth inch of rainfall is the minimum amount of rainfall that will produce runoff and is the smallest unit of measure on standard rain gauges operated by flood management agencies.) Flow from an MS4 outfall to Marina del Rey Harbor on a summer dry weather day is identified as a non-storm water discharge.

The MDR Bacteria TMDLs were adopted to reduce the risk of illness associated with swimming in marine waters contaminated with human sewage and other sources of bacteria. Approximately 200,000 beachgoers visit Mothers' Beach annually and is popular among mothers with children because of the absence of surf tides. In addition,

Marina del Rey Harbor is the homeport for over 5,000 pleasure boats, 6 yacht clubs, and 19 anchorages. Regionally, it has been estimated that between 627,800 and 1,479,200 excess gastrointestinal illness cases may occur annually among swimmers in Los Angeles County and Orange County beaches as a result of enterococci contaminated waters. The corresponding economic loss annually has been estimated to range from \$21 million to \$51 million. (*Regional Public Health Cost Estimates of Contaminated Coastal Waters: A Case Study of Gastroenteritis at Southern California Beaches*, Given S., L.H. Pendelton, and A.B. Boehm. *Env. Sci. Technol.* (2006).)

### **Related State Administrative Actions**

The State Water Board has issued standard receiving water limitations language to be included in municipal storm water permits. (State Board WQO 99-05, which amended WQO 98-01). The State Board affirmed that NPDES storm water permits must prohibit discharges that cause or contribute to violations of water quality standards (See WQ 98-01, at p. 8). The State Water Board had ruled earlier that municipal storm water permits must include effluent limitations necessary to achieve water quality standards (State Board Orders WQ 91-03 and WQ 91-04)<sup>2</sup>, and that these may be non-numerical. Also, Discharge Prohibitions need not be iterative (State Board Order WQ 2001-15, see footnote 18). The State Water Board modified the prohibition in WQO 2001-15, because the plain text in the San Diego County MS4 Permit prohibited the discharge of storm water containing pollutants exceeding water quality standards to the MS4, not non-storm water discharges. The discharge of non-storm waters to waters of the U.S. from an MS4 must strictly comply with 33 U.S.C. § 1311(b)(1)(C).

Even if the Water Boards were to allow for an iterative adaptive approach for storm water and non-storm water dischargers to comply with receiving water limitations, instead of establishing WQBELs or strict discharge prohibitions, it is the Permittees who are ultimately responsible for evaluating and revising BMPs to achieve compliance with

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<sup>2</sup> In Order WQ 91-04, the State Board reviewed a complaint brought by the environmental community that the 1990 LA County MS4 Permit lacked numerical effluent limits and violated federal law.

water quality standards in an iterative manner. The Water Boards have no affirmative obligation to notify MS4 Permittees that they are in violation of permit provisions, for them to initiate corrective action to remedy exceedances of water quality standards.

In September 2005, the State Water Board convened an expert panel to make findings and recommendations on the feasibility of including numerical effluent limitations in storm water discharge permits, including MS4 permits. The panel issued a report titled, *The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities* (June 2006). The panel concluded that it was not feasible to set enforceable numeric effluent criteria for municipal storm water discharges or storm water BMPs at this time. Nevertheless, the panel recommends an interim approach using action levels based either on consensus, or ranked percentile distributions, or statistically derived population parametrics. The panel neither deliberated nor made any determination on how non-storm water discharges from MS4s that adversely affect receiving waters are to be addressed in storm water permits. While the State Water Board has convened workshops to discuss the panel's report, the State Board has not yet taken any action on the report. Again, this panel's report does not address non-storm water discharges from point sources like the MS4.

#### **Implementation under the MS4 Permit through the IC/IDE Program**

LA County MS4 Permittees have been implementing an illicit connections/illicit discharges elimination (IC/IDE) program over nearly three permit terms (1990 – present) and have been accorded ample opportunity to eliminate unauthorized non-storm water discharges from the MS4 that are causing or contributing to the exceedance of a water quality objective, or to require operators of such discharges to be permitted through the Water Board's NPDES program. In 2001, the LA Water Board revised its single sample and geometric mean water quality objectives for bacteria to reflect U.S. EPA recommended criteria and the findings of a peer-reviewed local



epidemiological study (Regional Board Resolution 2001-018)<sup>3</sup> and Permittees should have revised their IC/IDE programs to eliminate the bacteria exceedances. However, very few Permittees have made changes to their Storm Water Quality Management Programs in response to exceedances of bacteria standards at SMB beaches and MDRH. A review of the three most recent Annual Program Reports (2003-2004, 2004-2005, and 2005-2006) for Permittees discharging to Santa Monica Bay and MDRH reveals that the primary mechanism for IC/IDE is a reactive program based on reported or discovered illicit discharges. Although the municipal response to reported or discovered illicit discharges appears to be effective in all the documented cases, there is a potential deficiency in identifying illicit connections. Less than half of the programs reviewed conducted illicit connection screening during the 2003/2004, 2004/2005 and 2005/2006 fiscal years. Further, the majority of the Permittees that conducted illicit connection screening examined only a small portion of their storm drain system. The review of the IC/IDE programs shows that while municipal response appears to be effective in eliminating reported or discovered illicit connections/illicit discharges, overall a proactive approach in preventing illicit connections is lacking.

Of the permittees in the MDRH Watershed, the County of Los Angeles screened approximately 30% of their closed storm drain system during the 2003/2004 and 2005/2006 fiscal years and approximately 20% during the 2004/2005 fiscal year for illicit connections. The City of Los Angeles did not report the length of closed storm drain pipes that were screened for illicit connections. The City of Culver City did not conduct illicit connection screening during the 2003/2004 fiscal year. During the 2004/2005 and 2005/2006 fiscal years Culver City screened 100% of their closed storm drain system for illicit connections. It is unknown whether the screened portions of the Los Angeles County and Culver City storm drain systems are within the MDRH Watershed. Furthermore, dry weather discharges from the MS4 continue to cause violations of bacterial water quality standards at Marina del Rey Harbor Basins D, E, and F.

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<sup>3</sup> As far back as the 1994 update, the Basin Plan included single sample and geometric mean water quality objectives for a subset of the fecal indicator bacteria included in the 2001 amendments.

### **Implementation under the MDR Bacteria TMDL**

The MS4 permittees in the MDR Watershed have already begun taking actions to reduce bacteria impairments in MDRH, including at Mothers' Beach. Technical options for compliance with the dry weather WLAs for MDRH have been previously analyzed by the Permittees (Marina del Rey Harbor Mother's Beach and Back Basins Bacteria TMDL Dry- and Wet-Weather Implementation Plan (January 2007); Santa Monica Bay Beaches Bacteria TMDL Implementation Plan for Jurisdictional Groups 2 and 3, (Feb 2005)). Potential solutions include (i) institutional controls (non-structural source controls) such as public education and restaurant inspections; (ii) sub-regional (distributed or decentralized) controls such as small-scale infiltration and limited treatment; (iii) regional controls such as capture, storage and treatment systems or constructed wetlands; and (iv) low-flow diversion to waste water treatment plants. The LA County MS4 Permittees within the MDR Watershed have already submitted an Implementation Plan, to achieve the MDR Bacteria TMDL, for the LA Water Board's review. In April of 2006, the Board reviewed and acknowledged support for this plan under Resolution 2006-009.

### **State Grants and Bond Funds for Implementation**

The State Water Board and the LA Regional Water Board have funded a total of 27 projects costing \$18.7 million within the Santa Monica Bay Watershed, of which the MDR Watershed is a part, to address bacterial contamination. Accordingly, some of the monies granted to the SMB Watershed are directed toward MDRH projects. Six of these projects worth \$3.5 million dollars are for the treatment of bacteria or pathogens as the primary pollutant. In addition, there are twenty-one Clean Beach Initiative (CBI) Projects worth \$15.1 million, primarily dry-weather diversion projects, within the Santa Monica Bay. These projects are managed by the State Water Board and are for bacteria reduction. Most of the projects are underway and are at various stages of completion. Similarly, the Santa Monica Bay Restoration Commission (SMBRC) has issued grant funds of about \$5.8 million for 16 projects to treat dry weather flows to Santa Monica Bay, eight of which have been completed.

Within the MDR Watershed, the Marina Beach Water Quality Improvement Project received \$2 million as a CBI Project to increase the water circulation at Marina (Mothers') Beach and to divert sheet flow from Basin D. The circulation phase of the project was completed in October 2006. In addition, the SMBRC provided \$200,000 through Proposition 50 for the Boone-Olive Plant low-flow diversion project, which was completed in December 2006.

### **Opportunity for Public Comment**

The notice of the LA Water Board's proceedings to incorporate the MDR Bacteria TMDL summer dry weather WLAs into the LA County MS4 Permit was circulated on May 11, 2007, which requested comments by June 25, 2007. It stated that the Board would consider the action at its July 12, 2007, Board meeting.

### **Options Considered**

The LA Water Board staff considered the following alternatives for making enforceable the MDR Bacteria TMDL summer dry weather WLAs for MS4 non-storm water discharges.

a. MS4 Storm Water Quality Management Program (SQMP) – An MS4 Storm Water Permittee's SQMP is its primary documentation for utilizing the iterative adaptive approach using BMPs or other methods to manage the quality of storm water discharges in order to comply with receiving water limitations. In contrast, non-storm water discharges are to be prohibited under federal storm water regulations. Therefore, the SQMP should have included an effective Illicit Connection/Illicit Discharge Elimination (IC/IDE) program and other source control measures to eliminate non-storm water discharges to the MS4 or to ensure that they are permitted through the Water Board's NPDES program. MS4 Permittees in the MDR Watershed have had more than a decade and a half to effectively implement this provision. The fact that MS4 non-storm water discharges to Marina del Rey Harbor still cause or contribute to exceedances of bacteria receiving water limitations, and that the LA Water Board adopted dry weather WLAs for Mothers' Beach and Basins D, E and F of Marina del

Rey Harbor in 2003 demonstrates the need for greater action and strict enforcement of the WLAs. Permittees have never taken the initiative to submit a Receiving Water Limits Compliance Report, despite recurring exceedances of water quality standards. As noted earlier, few Permittees have documented revisions to the SQMP to address chronic exceedances of water quality standards.

b. MS4 Unauthorized Non-Storm Water Discharge Prohibition – The LA MS4 Permit includes provisions to effectively prohibit unauthorized non-storm water discharges. Permittees may achieve the effective prohibition by implementing other source control measures or an IC/IDE program to remove unauthorized non-storm water discharges or to get them permitted through the Water Board's NPDES program. Given the fact that the proposed action is limited in scope in that it seeks to prohibit discharges during summer dry weather (non-storm water) from MS4s to Mothers' Beach and Basins D, E, and F in MDRH and that compliance is determined by receiving water limitations rather than end-of-pipe (i.e., effluent) limitations, it is a reasonable action by the LA Water Board to protect water quality and human health, while considering the burden it imposes on MS4 Permittees in the MDR Watershed. Thus, even if end-of-pipe concentrations exceed receiving water limitations, there is no exceedance unless the discharge causes or contributes to the exceedance of the Receiving Water Limits (RWLs). In essence, the prohibition option does not impose an end-of-pipe water quality based numeric effluent limitation, contrary to arguments raised by many Permittees. Rather, compliance with the bacteria WLAs is determined in the receiving water at the initial point of mixing. New language has been added to the RWLs section to clarify how compliance with the relevant limitations will be determined. Under federal law, when a non-numeric water quality based effluent limit is imposed, the permit's administrative record, and fact sheet needs to support the approach as sufficient to attain the WLA (See 40 CFR 124.8, 124.9 and 124.18). The LA Water Board's administrative record adequately supports the proposed approach as being sufficient to meet the MDR Bacteria TMDL summer dry weather WLAs.

c. Combined Non-Storm Water/Storm Water MS4 Permit – An MS4 storm water permit may also cover non-storm water discharges. In that case, both storm water discharges and non-storm water discharges can be included in the same permit (or in multiple

permits). The non-storm water discharges will be subject to the existing regulations promulgated for point source non-storm water discharges at 40 CFR 122.44(d). The MS4 was effectively designated a point source by the U.S. Congress in 1987, and thus the MS4 non-storm water discharges that have a reasonable potential to adversely impair the beneficial uses of receiving waters are subject to the stricter of the CWA BAT/BCT technology based controls or WQBELs. MS4 storm water discharges are subject to the discretionary provisions of CWA § 402(p). This continues to remain an option for the Water Board when regulating MS4 storm water and non-storm water discharges within a single NPDES permit.

d. Separate Individual Permit for MS4 Non-Storm Water Discharges – A separate permit for MS4 non-storm water discharges may be issued, which would require strict compliance with BAT/BCT technology based controls or WQBELs, whichever is more stringent. It is possible that the LA Water Board may elect this approach in the future, as it is required to consider numerical effluent limitations to implement non-storm water WLAs for dry weather non-storm water discharges from the MS4 to enforce the WLAs within the NPDES framework.

e. No Action Option – Given the limited scope of the action, which is to prohibit the discharge to Marina del Rey Harbor of summer dry weather flows containing bacteria in excess of Basin Plan objectives, and the economic and health costs associated with non-action or non-enforcement of the MDR Bacteria summer dry weather WLAs, the proposed action is reasonable and necessary. Furthermore, the MDR Bacteria TMDL required compliance with the summer dry weather WLAs by March 18, 12007, but exceedances continue to occur at Mothers' Beach during summer dry weather. The Regional Board is obligated by federal regulation (40 CFR 122.44(d)) to ensure that NPDES permits are consistent with the assumptions and requirements of any available waste load allocation. Failing to incorporate the summer dry weather bacteria waste load allocations into the permit at this time would be contrary to the federal regulatory purpose of making surface waters 'fishable and swimmable'.

### **Recommended Action**

Given the narrow purpose of the amendments, which is to make the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL summer dry weather WLAs enforceable for discharges from the MS4 staff recommends 'Option b'.

Option b amends the LA County MS4 permit in a limited manner with revisions to Findings; Part 1. Discharge Prohibitions Section; and Part 2. Receiving Water Limitations Section to incorporate the MDR Bacteria summer dry weather WLAs. The changes are the addition of new receiving water limitations for bacteria and a prohibition against non-storm water discharges from the MS4 to MDRH Basins D, E, and F that result in an exceedance of the bacteria receiving water limitations.

This action amending an NPDES permit is exempt from the provisions of Chapter 3 of the California Environmental Quality Act (Cal. Public Resources Code § 21100 *et. seq*) in accordance with Cal. Water Code § 13389. Nevertheless, staff considered the environmental impacts that may result from this action by evaluating the fiscal burden associated with eliminating bacteria exceedances at Mothers' Beach and MDR Harbor through various control measures and engineering practices with the economic and health costs associated with continuing exceedance of the beach bacteria standards, and determined that the environmental and public health benefits far outweigh the fiscal burden.

Part 6.I.1 of the permit identifies the limited conditions under which the LA County MS4 permit may be reopened for modification and the procedures to be followed. The procedures for this hearing and the recommended action fully comply with the terms of those permit provisions.

Item No. 12

**COMMENT LETTERS RECEIVED**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins  
Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**



DONALD L. WOLFE, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: WM-9

June 25, 2007

Ms. Deborah Smith  
Interim Executive Officer  
California Regional Water Quality  
Control Board - Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013-2343

Attention Rebecca Christmann

Dear Ms. Smith:

### COMMENTS ON THE PROPOSED REOPENING OF THE COUNTY OF LOS ANGELES MUNICIPAL SEWER SYSTEM PERMIT (NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT CAS004001)

We submit these comments on behalf of the County of Los Angeles and the Los Angeles County Flood Control District (collectively, the County). The County welcomes the opportunity to provide these comments as one of the agencies leading the efforts to improve water quality in Marina del Rey Harbor Back Basins, Mothers' Beach, and other locations throughout the County. In the spirit of partnership and for reasons described below, we urge the California Regional Water Quality Control Board (Regional Board) to enforce the Marina del Rey Harbor Bacteria (MDR Bacteria) Total Maximum Daily Load (TMDL) using an iterative, Best Management Practice (BMP)-based process, instead of as not to be exceeded numeric limits. For this reason, the Regional Board should not amend the Los Angeles County Municipal Storm Water Permit (the Permit) at this time. Alternatively, if the Regional Board is going to go forward, the more productive approach is to amend the permit to reflect the implementation plan submitted by the responsible jurisdictions, not numeric limits.



I. The County's Commitment to meeting water quality standards for bacteria in Marina del Rey.

The County is committed to meeting water quality standards for bacteria in Marina del Rey and throughout the County. Since adoption of the MDR Bacteria TMDL in 2003, the County has funded or participated in the following activities, amongst others:

- Marina Beach Water Quality Improvement Project, Phase I.
- Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.
- Marina del Rey Harbor Mothers' Beach and Back Basins Report of Small Drain Identification.
- Marina del Rey Vessel Discharge Report.
- Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL Coordinated Monitoring Plan.
- Marina del Rey Harbor Mothers' Beach and Back Basins Toxics TMDL Coordinated Monitoring Plan.
- Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL Wet-Weather Quantification Analysis.
- Marina Beach Water Quality Improvement Project, Phase II.
- Two low-flow diversion projects.
- Implementation of the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL Coordinated Monitoring Plan.

These projects represent completed projects. Additional studies and projects are scheduled for the future. All of these efforts have been taken in consultation with the Executive Officer and Regional Board staff, who have been kept apprised of these projects' timetables, progress, and any roadblocks when they have been encountered. The total cost of these projects has been in excess of \$4.5 million.

III. The proposed amendment to the permit is neither necessary nor appropriate.

Given the current efforts of the County and the other responsible jurisdictions and agencies, the proposed amendment to the Permit is neither necessary nor appropriate. Rather than furthering the goals of the TMDL, the proposed amendment could have the unintended consequence of diverting resources from ongoing efforts.

A. The County has submitted an implementation plan describing its approach to achieve compliance.

On January 8, 2007, the County submitted to the Regional Board an implementation plan describing the strategy by which we intend to use to comply with the MDR Bacteria TMDL. This implementation plan is the culmination of a collaborative process with both Regional Board staff and representatives from Heal the Bay and Santa Monica BayKeeper. The proposed compliance strategy takes into consideration the likelihood of success as well as cost-effectiveness. Addressing the summer-dry-weather impairments, the plan includes the following:

- Low-Flow Storm Drain Diversion Program.
- Mothers' Beach Water Quality Improvement Project (Increase Basin D Circulation).
- Marina Source Identification and Control Program.

As set forth above, two out of the three low-flow diversion projects are complete as of December 2006, with the third scheduled for completion in 2008. The Basin D Circulation project was completed in October 2006. Additional programs proposed in the implementation plan continue to be implemented while existing programs are continually evaluated to assess effectiveness.

The goal of achieving bacteria water quality objectives should be achieved through the iterative process, as is the case for achieving every other water quality objective. If the Regional Board is going to amend the Permit, it should do so by incorporating the appropriate BMPs in the implementation plan, not numeric limits. This approach is consistent with the Environmental Protection Agency (EPA) guidance on the subject and assurances that the Regional Board staff has previously given as to the manner in which the TMDLs will be incorporated into the Permit.

1.2

The EPA has adopted specific guidance on the incorporation of the TMDLs into stormwater permits. On November 22, 2002, the EPA issued a memorandum entitled, "Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs." In that memorandum, the EPA directly rejected placing numeric limits based on TMDLs in storm water permits, except in rare circumstances, recognizing that numeric limits are neither feasible nor appropriate given the variability of storm water runoff and the current lack of knowledge as to sources of pollutants and effective treatment for those pollutants. The EPA said:

v. 2  
Cont.

[I]n light of 33 U.S.C. Section 1342(p)(3)(B)(iii), EPA recommends that for NPDES-regulated municipal and small construction storm water discharges effluent limits should be expressed as best management practices (BMPs) or other similar requirements, rather than as numeric effluent limits . . . .

EPA's policy recognizes that because storm water discharges are due to storm events that are highly variable in frequency and duration and are not easily characterized, only in rare cases will it be feasible or appropriate to establish numeric limits for municipal and small construction storm water discharges. The variability in the system and minimal data generally available make it difficult to determine with precision or certainty actual and projected loadings for individual dischargers or groups of dischargers. Therefore, EPA believes that in these situations, permit limits typically can be expressed as BMPs, and that numeric limits will be used only in rare instances.

The EPA November 22, 2002, Memorandum at page 4. EPA further suggested that permits contain a monitoring program to assure compliance with the TMDL's limitations and reaffirmed the appropriateness of an iterative, adaptive BMP management approach. *Id.* At 5.

County staff has been working closely with Regional Board staff in developing implementation plans for several of the TMDLs that have been adopted. During this process, the County has been repeatedly assured that it was the Regional Board's intent to follow this EPA guidance with implementing these TMDLs through the Permit. There is nothing about the MDR Bacteria TMDL or the Permit that makes it a rare circumstance. Instead, given the variability in the system and the minimal data available as to the sources of bacteria in the Marina, this TMDL falls squarely within the EPA guidance.

Inclusion of numeric limits is also directly contrary to the recommendations of the panel of experts convened by the State Water Resources Control Board. In its report, *The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities* (June 2006), on page 8, the panel specifically concluded that it is not feasible at this time to set enforceable numeric effluent criteria for municipal BMPs and in particular urban discharges. The panel reaches this conclusion because of the difficulty in determining the specific causative agents or the level of control needed to address a specific beneficial use impairment in a receiving water, and because no protocol exists that enables an engineer to design with certainty a BMP that will produce the desired result. (See pages 5-6). 1.3

In the fact sheet issued in support of the proposed amendment, Regional Board staff attempt to characterize the panel of expert's report as not applying to the discharges that are the subject of the instant, proposed amendment. To the contrary, the panel of experts were addressing precisely the type of discharges that are the subject of this proposed amendment. The panel of experts did not distinguish between dry- and wet-weather discharges. Moreover, even if the panel had distinguished between the two types of discharges, the reason why the panel of experts concluded numeric effluent limits are not feasible would still apply here.

The fact sheet also appears to imply that the proposed amendment is not imposing numeric effluent limits. Such an assertion, if it is being made, would be pure sophistry. Under the proposed amendment, enforcement appears to be based on whether a sample exceeds a number. The proposed amendment thus appears to be adding a numeric limit for enforcement purposes to the Permit.

- B. The Regional Board should not incorporate numeric bacteria limits into the Permit while the issue is being examined of whether fecal bacteria from nonpoint sources accurately indicates the presence of human pathogens. 1.4

The scientific community's knowledge about bacteria sources and whether bacteria are an appropriate indicator of the presence of human pathogens is limited. This does not mean that in certain circumstances it might not be appropriate for TMDLs to address bacteria. Numeric effluent limits, however, should not be adopted while studies are raising questions about currently-held assumptions, and the studies that have been performed show no health risk where there is no direct contribution from human sources. This is particularly important in Marina del Rey, as the studies to date show significant contributions from birds and wildlife, and little if any contributions from human sources.

1. According to the study, nonhuman sources contribute to a majority of bacterial loading in the Marina.

In March 2007, the County submitted to the Regional Board the results of the Non-point Source Study conducted over a one-year period between July 2005 and July 2006. Using a weight-of-evidence approach, the study was designed to determine the relative bacterial loading to the Harbor from sources including, but not limited to, storm drains, boats, birds, and other nonpoint sources. (Mothers' Beach and Back Basins Bacteria TMDL Non-Point Source Study Final Report, Weston Solutions, Inc., February 2007, Pages ES-1). The study found that the majority of the enteric bacteria detected in the Marina del Rey Harbor back basins originate from birds and other wildlife. (Page ES-4.) Human sources were found to contribute only 3 percent of the bacteria for both dry- and wet-weather overall. (Page ES-2.)

2. Studies performed to date indicate that there might not be a risk to human health where human sources are not present.

Studies performed to date indicate that one cannot assume that there is a risk to human health where there are no human sources of bacteria. To the contrary, a recent study found no correlation between the risk of illness from waterborne pathogens and fecal indicators (total coliforms, fecal coliforms and enterococcus) at a beach where nonpoint sources were the dominant fecal source. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg 2005), *Recreational Water Contact and Illness in Mission Bay, California, Southern California Coastal Water Research Project, Technical Report 449*. While the report cautioned against extrapolating its findings beyond the study's location, and did not address wet-weather conditions, the author of the study did conclude that the study suggested the need for further evaluation of traditional indicators in circumstances where nonpoint sources are dominant fecal contributors.

1.4  
cont.

Another recent study found that, at enclosed beaches, bacteria may remain in the sand longer than in the water column. (See Lee, C.M., T. Lin, C.-C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006) Sediments as a reservoir for fecal indicators bacteria at three Santa Monica Bay beaches. *Water Research*, In press.). This study also demonstrates that our knowledge about these bacteria indicators is still very limited.

A third study, Ishii, S., Hansen, D. L. Hicks, R. E., Sadowsky, M. J., *Beach Sand and Sediments are Temporal Sinks and Sources of Escherichia Coli in Lake Superior*, *Environ. Sci. Technology.*, 41 (7). Web Release Dated: March 1, 2007, likewise found that bacteria may multiply in sand. This study dealing with bacteria in fresh water, also found that less than 1 percent of the strands of E. coli being studied were potentially pathogenic, again indicating that the source of the bacteria is an important criteria in determining whether the bacteria poses a health risk to humans.

Given the question about the risk to human health where no human sources are present, and given the studies that show minimal or no contribution from human sources to the bacteria found in Marina del Rey, the Regional Board should not simply place the proposed numeric criteria into the Permit. Instead the Regional Board should take a more measured approach, at least until there is a better understanding of the risks posed in the Marina and its back basins.

**3. Incorporating numeric limits into the permit could result in the division of resources that could otherwise be devoted to permit programs and compliance with the TMDL.**

1.5

The inclusion of numeric limits in the Permit could result in the diversion of resources that could otherwise be devoted to compliance with the TMDL. Although the Regional Board has placed in the permit a process for its staff to follow in determining whether an exceedance warrants further investigation or enforcement (see Finding of Fact 34), the Regional Board is not the sole party that can attempt to enforce the permit's terms. Under the Clean Water Act, any citizen after giving proper notice can file a lawsuit contending that a permittee is not in compliance with the permit's terms, 33 U.S.C. Section 1365. These citizens are not bound by the procedure that the Regional Board has imposed on its staff.

If such a citizen suit were to be filed against any of the responsible jurisdictions, including the County, significant funds and employee resources of that agency would have to be diverted from permit and TMDL programs to addressing that lawsuit. The proposed amendment, to the extent it imposes requirements not subject to the iterative process, invites those lawsuits.

The risk of such a lawsuit is real. Only May 31, 2007, the Natural Resources Defense Council and the Santa Monica BayKeeper sent a letter to the City of Malibu and the County giving notice pursuant to 33 U.S.C. Section 1365 of an intent to sue, contending that the city and the County were discharging in violation of the permit. Although the County believes that it is in compliance with the permit and that NRDC and the BayKeeper will not prevail in any suit, there is no question that such an action, if filed, will divert funds and staff resources that could otherwise go towards pollution reduction programs. Adoption of permit terms like those in the proposed amendment, as opposed to making the terms subject to the iterative process, will only encourage such third party lawsuits and resulting a diversion of resources.

- III. If the Regional Board is going to go forward with the amendment, it should insert the word nonstormwater in Part 1.B and Part 2.6. 1.6

In the fact sheet, it is stated several times that the proposed amendment is aimed solely at nonstormwater discharges. The amendment's proposed language, however, is ambiguous. If the Regional Board is going to adopt the proposed amendment, then to remove this ambiguity the word nonstormwater should be inserted in both proposed Part 1.B. and proposed Part 2.6.

Proposed Part 1.B. thus should read Discharges of nonstormwater summer dry-weather flows from MS4s . . . cause or contribute to exceedances of the bacteria receiving water limitations in Part 2.5 below are prohibited.

Proposed Part 2.6 thus should read during summery dry-weather there shall be no nonstormwater discharges of bacteria from MS4s into Marina del Rey Harbor basins . . .

- IV. Should the Regional Board go forward with its proposed amendment, then proposed Part 2.6 should be renumbered as Part 2.3 and made a part of the iterative process. 1.7

Part 2 of the Permit currently sets forth the iterative process to reach water quality objectives. This is the process recommended by EPA and ordered by the State Water Resources Control Board. See State Board Order WQ 99-05.

The iterative process has been adopted in recognition of the difficulties in addressing stormwater discharges, both during dry- and wet-weather, the difficulties in identifying the specific cause of an exceedance, the difficulties in designing BMPs to produce a specific result, and the need to refine and learn from BMP implementation.

The proposed amendment excepts efforts to comply with water quality objectives in Marina del Rey from the iterative process. The stated reasons are that the summer dry-weather wasteload allocations do not regulate the discharge of stormwater; there is harm to the public and cost to the region associated with illness; efforts to eliminate illicit connections or discharges have not eliminated standards violations at beaches; and few permittees have documented revisions to their synchronization quality meter platform to address chronic exceedances of water quality standards. See Proposed Findings 32.

These stated reasons reflect a basic lack of misunderstanding of the underlying facts. First, the proposed finding asserts that the permit modification does not regulate the discharge of stormwater. This assertion ignores the definition of stormwater, which includes surface runoff and drainage during the summer. See 40 C.F.R. 122.26(b)(13);

Permit, p. 61. Thus, the discharges at issue could include discharges that fall within the definition of stormwater. As set forth above, to avoid this ambiguity, the word nonstormwater should be added to Parts 1.B. and 2.6 to make clear that the amendment is intended to apply solely to nonstormwater.

Second, there is no evidence to support the conclusion that there is any greater harm to the public or cost to the region by addressing this issue through the iterative approach. Instead the iterative approach has been adopted because it is more effective and cost efficient. Moreover, a strictly prohibitory approach has the potential to waste public funds, especially where the source of bacteria is not fully defined and studies have shown that one can not assume that there is a risk to human health where there are no human sources of bacteria.

Third, there is no evidence that any illicit connection or discharge into the MS4 is contributing bacteria to Marina del Rey. In fact, as Regional Board staff is aware, as part of the Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study, a closed-circuit television camera investigation was conducted of the sewer lines around Mothers' Beach and portions of the basins that are the subject of the MDR Bacteria TMDL. These lines are sanitary sewer lines, not storm channel connections. Nevertheless, steps are already being taken to address any deficiency noted in the sewer lines as a result of this inspection.

Finally, the assertion that there have been no proposed revisions to the synchronization quality meter platform to address the Marina is incorrect. As noted above, the responsible jurisdictions have submitted a Dry- and Wet-weather Implementation Plan which contains extensive recommendations for programs to address the Marina, and some of those programs have already been implemented.

Thus, there is no legitimate basis for excepting efforts to comply with water quality objectives in Marina del Rey from the iterative process, and the stated bases in proposed finding 32 do not provide otherwise.

V. Any changes to the Permit are required to be made at the time of its renewal, not by way of amendment.

The Permit was adopted on December 13, 2001. By its terms, it was due to expire on December 13, 2006.



On June 12, 2006, the permittees, including the County, submitted a Report of Waste Discharge, applying for issuance of a new permit. That application remains pending. By reason of the application, the terms of the Permit have remained in effect until the permit is issued.

Because the Permit term has expired and a new permit application has been submitted, the Regional Board is without authority to reopen the Permit and amend it. Instead the Regional Board must address any modification through issuance of a new permit itself. 23 Cal. Code Reg. Section 2235.4 provides that the terms and conditions of an expired permit are automatically continued pending issuance of a new permit if all requirements of the Federal NPDES regulations on continuation of expired permits are complied with. 40 C.F.R. Section 126.62(a) provides that permits may be modified only during their terms. The permit had a five-year term. Although the Permit's provisions remain in effect during the current application process pursuant to 23 Cal. Code Reg. Section 2235.4 and 40 C.F.R. Section 122.6, nothing in either of these sections allows modification as opposed to issuance of a new permit. 1.8

Moreover, even if the Regional Board has the authority to amend a permit after its term has expired and an application for a new permit is pending, to do so here would be arbitrary and capricious. The Regional Board staff has not processed the permittees' application for a new permit, and the fact sheet indicates that the staff does not intend to bring the application before the Regional Board until 208. It is arbitrary and capricious to fail to process the application and then contend it is necessary to make immediate changes to the old Permit's terms. It is arbitrary and capricious to make piecemeal changes to the old Permit, rather than to give the permittees a hearing on a new permit as a whole.

**VI. There is no lawful basis for making one permittee responsible for the conduct of other permittees.**

Proposed footnote 3 contains the provisions that all permittees within a subwatershed of the Santa Monica Bay Watershed Management Area are jointly responsible for compliance with the limitations imposed in Tables 7-4.1 and 7-5.1 of the Basin Plan.

There is no lawful basis, however, for making one permittee responsible for another permittee's compliance. Under the Clean Water Act and the California Water Code, a permittee is responsible for its own discharge. Under the Permit, a permittee is responsible for its own discharge. Thus a provision asserting that all permittees within a subwatershed are jointly responsible for compliance is not enforceable and has no place in the Permit. This provision should be deleted. 1.9

VII. The proposed findings are not sufficient to support the proposed amendment and the evidence identified to date does not support the proposed findings.

The Permit's provisions must be supported by adequate findings. Water Code Sections 13263 and 13377; Code of Civil Procedure Section 1094.5. The proposed amendment does not meet this requirement. To include the proposed amendment in the Permit, the Regional Board must first make the following findings to support the amendment:

1.10

1. A finding identifying the sources of the bacteria at issue.
2. A finding that it is technically feasible to comply with the terms of this amendment.
3. A finding that the terms of the amendment can be met through cost-effective programs that will be accepted by the public.
4. A finding that the amendment will not require the permittees to adopt controls or implement programs that go beyond the maximum extent practicable standard applicable to municipal stormwater permits, 33 U.S.C. Section 1342(p)(3)(B)(iii) in order to comply with the amend.
5. A finding that the terms of the amendment are reasonably achievable.
6. A finding that the Regional Board has considered all factors set forth in the Water Code Section 13241, including (a) the environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto, (b) water quality conditions that could reasonably be achieved through the coordinated control of all facts which affect water quality in the areas, and (c) economic considerations.
7. A finding that the amendment is reasonable in light of the Water Code Section 13241 facts.

The evidence identified to date in the notice and the fact sheet is insufficient to support the findings the Regional Board is required to make before it can adopt the proposed amendment. For the reasons previously discussed, the evidence also does not support Proposed Finding 32.

#### VIII. Administrative record

Pursuant to the notice of hearing, the County requests that the following studies, memorandum and documents in the Regional Board's files be brought to the hearing and included in the administrative record: 1.11

1. The Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial Total Maximum Daily Load Dry- and Wet-Weather Implementation Plan.
2. Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.
3. *The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities* (State Water Resources Control Board Panel of Experts, June 2006).
4. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg (2005), Recreational Water Contact and Illness in Mission Bay, California, *Southern California Coastal Water Research Project, Technical Report 449*.
5. Lee, C. M., T. Lin, C. -C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006) Sediments as a Reservoir for Fecal Indicators Bacteria at Three Santa Monica Bay Beaches, Water Research. In press.
6. Noble, R. T., Griffith, J. F., Blackwood, A. D., Fuhrman, J. A. Gregory, J. B. Hernandez, X., Liang, X., Bera, A. A., and Schiff, K., Multitiered Approach Using Quantitative PCR to Track Sources of Fecal Pollution Affecting Santa Monica Bay, California. *Applied and Environmental Microbiology* (February 2006).

7. EPA memorandum, dated November 22, 2002, entitled, Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs.
8. Letter dated May 31, 2007, from the Santa Monica BayKeeper and NRDC to the County of Los Angeles and the City of Malibu. (The letter reflects that a copy was sent to both Francine Diamond, Chair, and Deborah Smith, Acting Executive Officer of the Regional Board.)

The County also requests that the following study be included as part of the administrative record. If a copy is not in the Regional Board's files or available to its staff, the County will submit a copy before the hearing: Ishii, S., Hansen, D. L., Hicks, R. E., Sadowsky, M. J., Beach Sand and Sediments are Temporal Sinks and Sources of Echerichia Coli in Lake Superior Environ. Sci. Technology., 41 (7). Web Release Date: March 1, 2007.

The County reserves the right to supplement this list or submit other evidence after reviewing any responses to comments issued by the Regional Board staff and at the hearing itself.

#### IX. Conclusion

For the above reasons, the County submits that the best approach to achieving water equality objectives is a partnership between the Regional Board and its staff, the County, and the other responsible agencies named under the MDR Bacteria TMDL. The Regional Board should defer consideration of the proposed amendment at this time. Moreover, any amendment should incorporate an iterative, BMP-based approach to achieve the desired water quality goals.

1.12

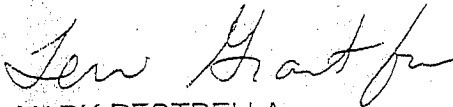
Ms. Deborah Smith  
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Page 14

If you have any questions, please contact me at (626) 458-4300, or  
mpestrel@dpw.lacounty.gov.

Thank you for consideration of these comments.

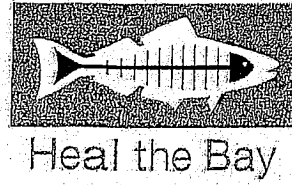
Very truly yours,

DONALD L. WOLFE  
Director of Public Works



MARK PESTRELLA  
Assistant Deputy Director  
Watershed Management Division

FW:sw  
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June 25, 2007

Ms. Deborah Smith, Interim Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 W. 4<sup>th</sup> Street, Ste. 200  
Los Angeles, CA 90013

Re: Comments on the Proposed Reopener of the County of Los Angeles  
Municipal Stormwater Discharge Permit (NPDES No. CAS004001)

Dear Ms. Smith:

Thank you for the opportunity to comment on the proposed incorporation of the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria Total Maximum Daily Load ("MDR Bacteria TMDL") for summer dry weather discharges from MS4 outfalls to Marina del Rey Harbor into the Los Angeles County MS4 National Pollutant Discharge Elimination System ("NPDES") permit. Federal law mandates that the Los Angeles Regional Water Quality Control Board ("Regional Board") integrate TMDLs into NPDES permits. Santa Monica Baykeeper, Inc. and Heal the Bay support the Regional Board staff in proposing the L.A. MS4 permit reopener, dated July 12, 2007.

The Regional Board adopted the MDR Bacteria TMDL with Resolution No. 2003-012 in 2003. The TMDL was subsequently approved by the State Water Resources Control Board ("State Board") with Resolution No. 2003-0072. On March 18, 2004, following the approval of the U.S. EPA, the MDR Bacteria TMDL became effective. Compliance with the TMDL's summer dry weather Waste Load Allocations (WLAs) was to be achieved by March 18, 2007.

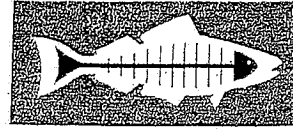
This reopener is consistent with the September 14, 2006 amendment of the LA County MS4 NPDES permit which incorporated the Santa Monica Beach Bacteria TMDL WLAs for summer dry weather. Although Marina del Rey Watershed is a subwatershed of the Santa Monica Bay Watershed, this reopener is required because there are separate summer dry weather Bacteria TMDLs for each.

2.1

All monitored locations in MDR must meet state beach bacteria health standards 100% of the time during summer dry weather (April 1 to October 31). Based on data collected, it is clear that a number of locations in MDR do not comply with the MDR Bacteria TMDL requirements for summer dry weather. Specifically, data collected since April 1, 2007 show at least 10 exceedance days of the MDR Bacteria TMDL requirements for summer dry weather. Seven of these exceedance days were at Mothers Beach, a beach frequented by families. This demonstrates that the State needs an additional tool to assure compliance.

2.2

The reopener is timely as it will enforce the MDR Bacteria TMDL for summer dry weather during the summer season, which is the period of highest use of the beaches and waters of

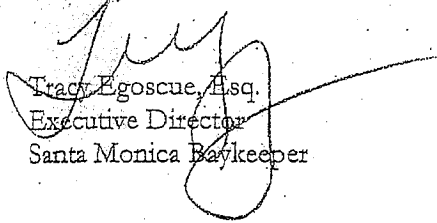


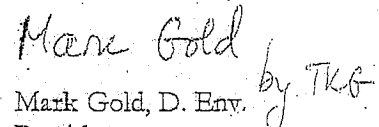
Heal the Bay

Marina del Rey Harbor. As a result of this reopener, the health of thousands of people visiting Mothers' Beach and Back Basins will be better protected. Santa Monica Baykeeper and Heal the Bay commend the Regional Board Staff for proposing a reopener to address the problem with bacterial pollution at the Marina del Rey Harbor and thus expediting the inclusion of the MDR Bacteria summer dry weather WLAs of the TMDL instead of waiting until 2008 to include the already adopted TMDL in the new LA County MS4 NPDES permit.

Santa Monica Baykeeper and Heal the Bay thank the Regional Board Staff for its hard work in preparation of this reopener which is an important step in improving the water quality of Santa Monica Bay.

Sincerely,

  
Tracy Egoscue, Esq.  
Executive Director  
Santa Monica Baykeeper

  
Mark Gold, D. Env. by TK.G  
President  
Heal the Bay

Item No. 12

**RESPONSE TO COMMENTS**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins  
Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**



**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)**

**Table 1. List of commenters submitting written comments before the close of the public comment period.**

Letter Number	Commentor	Date Received
1	Donald L. Wolfe, County of Los Angeles Department of Public Works	June 25, 2007
2	Tracy Egoscue, Santa Monica Baykeeper and Mark Gold, Heal the Bay	June 25, 2007

Note: The letter number above corresponds to the first number in the Comment Number field in Table 2.

**Table 2. Responsiveness summary for written comments submitted before the close of the public comment period.**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.1	The County is committed to meeting water quality standards for bacteria in Marina del Rey Harbor (MDRH). Since adoption of the MDR Bacteria TMDL in 2003, the County has funded or participated in various studies and projects in excess of \$4.5 million.	The Regional Board acknowledges the actions taken to date by the County of Los Angeles to improve water quality and achieve water quality standards in MDRH. Staff notes, however, that approximately \$2.2 million of the \$4.5 million spent on studies and projects were not County monies, but funds awarded to the County from various grant programs. Additionally, staff notes the extensive litigation the County has mounted to challenge the storm water permit during the last six years, all of which has taken County and State resources away from efforts to improve water quality and attain water quality standards.  Additionally, irrespective of the efforts undertaken to date, exceedances of water quality standards continue in Marina del Rey Harbor and at Mothers' Beach. Since April 1, 2007, there have been 12 exceedance days of water quality standards at Mothers' Beach and Basins D, E and F within MDRH. These exceedances result in significant costs to the MDR communities in terms of lost tourism and related revenues, lost recreational opportunities, and illnesses incurred by the public due to poor water quality in MDRH and at Mother's Beach.	NO
1.2	The MS4 Permit should be amended to incorporate BMPs from the MDRH implementation plan and monitoring to determine if compliance is being achieved, not numeric limits. This approach would be consistent with USEPA's guidance on the incorporation of TMDLs into storm water permits. On November 22, 2002, USEPA issued a memorandum that rejected	This comment is the same as Comment 11.2 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.	NO

RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
	<p>placing numeric limits based on TMDLs in storm water permits, recognizing that numeric limits are neither feasible nor appropriate given the variability of storm water runoff and the current lack of knowledge as to sources of pollutants and effective treatment for those pollutants.</p>	<p>The USEPA memorandum referenced is not a policy, but a "non-binding" "guidance" memorandum containing general recommendations that may or may not be applicable to a given TMDL. It notes that "there may be other approaches that would be appropriate in particular situations," and that USEPA would make each permitting decision on a case-by-case basis considering the particular circumstances of each. (See USEPA November 22, 2002 Memorandum at pages 5-6.) Furthermore, the proposed permit amendment is not contrary to the recommendations in the memorandum. The memorandum's recommendations relate specifically to municipal "storm water" discharges. Specifically, the memorandum states that EPA recognizes that "storm water discharges are due to storm events that are highly variable in frequency and duration and are not easily characterized," and therefore numeric effluent limits may be infeasible or inappropriate. The provisions of this amendment, however, do not relate to storm events, and in fact, storm events are specifically excluded from these provisions. This reopener only relates to dry weather discharges, which are by definition not storm discharges, but rather days with less than 0.1 inch of rain. Such non storm water discharges are primarily nuisance flows, such as watering lawns, washing cars, and other incidental and nominal discharges of urban living that flow into the storm drains. The provisions are included as receiving water limitations because the TMDL's waste load allocations are expressed as 'exceedance days' in the water body, i.e., receiving water limitations.</p>	
		<p>The MS4 permit is abundantly clear that unauthorized non storm water discharges to the MS4 system are prohibited. Similar prohibitions were contained in the 1990 and 1996 LA MS4 permits. Prohibiting non-storm water discharges from the MS4, which cause exceedances of bacteria standards is the intent of the TMDL, and consistent with the permit. It is the same approach taken to incorporate the analogous</p>	

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MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. GAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.3	<p>Inclusion of numeric limits is also directly contrary to the recommendations of the panel of experts convened by the State Water Resources Control Board. In its report, The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water associated with Municipal, Industrial and Construction Activities (June 2006), the panel specifically concluded that it is not feasible at this time to set enforceable numeric effluent criteria for municipal BMPs and in particular urban discharges. The panel reaches this conclusion because of the difficulty in determining the specific causative agents or the level of control needed to address a specific beneficial use impairment in a receiving water, and because no protocol exists that enables an engineer to design with certainty a BMP that will produce the desired result.</p>	<p>provisions of the Santa Monica Bay Beaches Bacteria (SMBBB) TMDL into the MS4 Permit in September 2006.</p> <p>Furthermore, in the case of the MDRH Bacteria TMDL, the watershed is 2.9 square-miles; responsible agencies have undertaken a study to identify the sources of bacteria (Mother's Beach and Back Basins Bacteria TMDL Non-Point Source Study, February 2007); and there is ample knowledge regarding effective treatment of bacteria. These circumstances lend credence on scientific and technical grounds to incorporating numeric receiving water limits into the permit for dry weather discharges from the MS4 to MDRH and Mother's Beach.</p> <p>This comment is similar to Comment 11.4 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p> <p>The panel neither deliberated nor made any determination on how non-storm water discharges from MS4s that adversely affect receiving waters are to be addressed in storm water permits. Further, the proposed limits are receiving water limitations, not effluent limitations. While the State Water Board has convened workshops to discuss the panel's report, the State Board has not yet taken any action on the report. To reiterate, this panel's report does not address non-storm water discharges from point sources like the MS4. This proposed action deals with non-storm water discharges.</p> <p>In addition, nothing in the record supports the claim that complying with the permit provisions that implement the dry weather WLAs would be infeasible or inappropriate. In fact,</p>	NO

RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.4	<p>The Regional Board should not incorporate numeric bacteria limits into the Permit while the issue is being examined of whether fecal bacteria from non-point sources accurately indicate the presence of human pathogens.</p> <p>A recent study found no correlation between the risk of illness from waterborne pathogens and fecal indicators (total coliforms, fecal coliforms and enterococcus) at a beach where non point sources were the dominant fecal source. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg 2005), Recreational Water Contact and Illness in Mission Bay, California, Southern California Coastal Water Research Project, Technical Report 449.</p>	<p>the County of Los Angeles is in the process of complying with the provisions. The County has already completed two out of three low-flow diversion projects, with the third scheduled for completion in 2008. The Mothers' Beach Water Quality Circulation Project was completed in October 2006. Additional programs continue to be implemented, while existing programs are continually evaluated to assess effectiveness. See also response to Comment 1.2.</p> <p>This comment is the same as Comment 11.5 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p> <p>It is well documented that discharges from storm drains during dry and wet weather carry significant loads of bacteria to the shoreline in southern California. Noble et al. found that freshwater outlets, which included storm drains, failed to meet bacterial indicator standards in almost 60% of the samples, the worst of all of the strata evaluated in the regional shoreline monitoring program. Most of the standard failures near freshwater outlets were for multiple indicators and occurred repetitively throughout the five-week summer study period. (Noble, Rachel T., Dorsey, J., Leecaster, M., Mazur, M., McGee, C., Moore, D., Victoria, O., Reid, D., Schiff, K., Vainik P., Weisberg, S. 1999. Southern California Bight 1998 Regional Monitoring Program, Vol. 1: Summer shoreline microbiology. Southern California Coastal Water Research Project, Westminster, CA.)</p>	NO
		<p>It has also been documented that storm drains discharging to the shoreline of Santa Monica Bay contain human pathogens. Noble et al., cited above, showed through molecular tests the presence of human enteric virus genetic</p>	

**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
		<p>material in 7 of the 15 freshwater outlets, with 73% of these detections coinciding with levels of fecal coliforms that exceeded bacterial indicator thresholds.</p> <p>Furthermore, it was well documented in a landmark epidemiological study at Santa Monica Bay beaches that there are significantly increased health risks from swimming and otherwise engaging in water recreation in the ocean in the vicinity of flowing storm drains (Haile, R.W., Alamillo, J., Barret, K., Cressey, R., Dermond, J., Ervin, C., Glasser, A., Harawa, N., Harmon, P., Harper, J., McGee, C., Millikan, R.C., Nides, M., Witte, J.S. 1996. An epidemiological study of possible adverse health effects of swimming in Santa Monica Bay, Santa Monica Bay Restoration Project; Haile, R.W., Witte, J.S., Gold, M., Cressey, R., McGee, C., Millikan, R.C., Glasser, A., Harawa, N., Ervin, C., Harmon, P., Harper, J., Dermond, J., Alamillo, J., Barret, K., Nides, M., Wang, G. 1999. The health effects of swimming in ocean water contaminated by storm drain runoff. Epidemiology 10(4):355-363.). While there may be unknowns regarding the myriad sources of bacteria within a watershed, in light of these scientific findings, it is appropriate that the Regional Board not wait to regulate these discharges given that the health of thousands of beachgoers is at stake.</p> <p>While the integrity of the bacteria water quality standards is not presently before the Regional Board, the evidence submitted by the County does not countervail the volumes of extensive data to the contrary. The Mission Bay Study was conducted after an extensive amount of work was done to identify and eliminate all anthropogenic sources of bacteria to Mission Bay; this is not the case with the MDRH. In addition, the Study cautioned against extrapolating its findings beyond the study area.</p>	

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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.5	<p>Incorporating numeric limits into the permit could result in the division of resources that could otherwise be devoted to permit programs and compliance with the TMDL. If a citizen lawsuit were to be filed against any of the responsible jurisdictions, including the County, significant funds and employee resources of that agency would have to be diverted from permit and TMDL programs to address that lawsuit. The proposed amendment, to the extent it imposes requirements not subject to the iterative process, invites those lawsuits.</p>	<p>These facts were already established by regulation when the TMDL was adopted. And the County's contentions in this regard were also rejected by the Regional Board in September 2006 when the SMBBB TMDL was incorporated into the MS4 permit.</p> <p>It is not appropriate to establish an iterative approach to regulate non-storm water, point source discharges. The iterative approach was designed as a component of MEP compliance, and MEP is directed to storm water discharges, not non-stormwater. In any event, compliance with the iterative process is not a safe harbor from citizen's suits, and therefore an iterative approach as opposed to that proposed provides no greater protection from such lawsuits. Furthermore, given the lack of reported compliance with the iterative approach over the last six years, and the lack of evidence of myriads of citizens suits having been filed (very few such suits have ever been filed to enforce the storm water permit), this claim has no practical basis. The County has neither explained nor submitted evidence to support how these permit provisions would themselves stimulate more lawsuits.</p> <p>Under either an iterative approach, or under the proposed receiving water limitations approach, the County is required to attain the WLAs. Only failing to attain the WLAs gives rise to citizens' suits. The County has proffered no evidence that the cost of actually attaining the WLAs would be different under an iterative approach. Failing to comply with the permit provisions, including the WLAs, is an appropriate basis for a citizens' suit.</p> <p>This comment essentially reflects the County's desire that it does not wish to be subject to enforcement for failing to comply with the permit conditions. Nevertheless, section 505 of the Clean Water Act, creating a citizen's right of action to enforce the Act's provisions, is the national policy</p>	NO

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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
		<p>established by Congress, and it is not incumbent on the Regional Board to endeavor to circumvent that policy.</p> <p>Finally, with respect to the alleged diversion of resources, staff are sensitive to the claim, given the vast resources the Regional Board, State Board, and the Attorney General's Office has been forced to expend to defend against the permittees, including the County's, wholly unsuccessful challenge to this permit over the last six years, up to the California Supreme Court.</p> <p>Even if preventing the County from being subjected to citizens' suits, as opposed to ensuring compliance with water quality standards, was a proper basis upon which to determine permit limits, the County has proffered no evidence to support its claim. The County has submitted no budget set aside to defend against spurious or even legitimate citizens suits. The County has submitted no explanation as to why these provisions would spur inappropriate citizens' suits. The County has submitted no estimate or evidence to support an estimate, of how much money such litigation might cost. The County has submitted no explanation or supportive evidence of how those moneys would affect the County's storm water compliance budget. Nor has the County submitted evidence that it is unable to obtain funding for such litigation without harming its compliance efforts. In fact the County has spent significant moneys during the last six years to litigate the LA County MS4 Permit. Finally, the County has submitted no evidence to rebut the presumption inherent in citizens' suits provisions of the CWA, that private enforcement will promote compliance with the Act.</p>	
1.6	<p>The amendment's proposed language is ambiguous. The Regional Board should insert the word 'non storm water' in proposed Part 1.B and Part 2.6.</p>	<p>This comment is the same as Comment 1.B.15 the County made during the proceeding to incorporate the SMBBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated</p>	NO

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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.7	<p>The proposed Part 2.6 should be renumbered as Part 2.3 and made a part of the iterative process. Part 2.3 of the MS4 Permit currently sets forth the iterative process to reach water quality objectives. This is the process recommended by EPA and ordered by the State Water Resources Control Board. See State Board Order WQ 99-05.</p>	<p>without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p> <p>The current wording in Part 1.B and Part 2.6, which refers to 'Summer Dry Weather' is consistent with the regulatory language of the TMDL. The term 'summer dry weather' is clearly defined in the TMDL and in Part 5. DEFINITIONS of the MS4 Permit starting on page 57. It would be redundant to insert the word 'non storm water'.</p> <p>This comment is the same as Comment 1.B.9 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p>	NO
1.8	<p>The Regional Board is without authority to reopen the Permit and amend it because the Permit has expired and a new permit application has been submitted.</p>	<p>The USEPA's Wet Weather TMDL Policy and State Board WQO 99-05 discuss the use of an iterative approach to controlling pollutants in storm water discharges. For non-storm water discharges from MS4s that cause or contribute to exceedances of a water quality standard, the appropriate response is to prohibit the discharges or require compliance with the water quality standards.</p> <p>The key reasons for not employing an iterative approach to implement the MDRH Bacteria Summer Dry Weather WLAs are: (1) The WLAs do not regulate the discharge of storm water; and (2) The harm to the public from violating the WLAs is dramatic both in terms of health impacts to exposed beachgoers, and the economic cost to the region associated with related illnesses.</p> <p>As the County notes, "the terms and conditions" of the permit have been administratively extended. Those terms and conditions include the reopeners.</p>	NO



**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
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(NPDES NO. CAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
	<p>Instead the Regional Board must address any modification through issuance of a new permit.</p> <p>23 Cal. Code Reg. Section 2235.4 provides that the terms and conditions of an expired permit are automatically continued pending issuance of a new permit if all requirements of the Federal NPDES regulations on continuation of expired permits are complied with.</p> <p>40 C.F.R. Section 122.62(a) provides that permits may be modified only during their terms. Although the Permit's provisions remain in effect during the current application process pursuant to 23 Cal. Code Reg. Section 2235.4 and 40 C.F.R. Section 122.6, nothing in either of these sections allows modification as opposed to issuance of a new permit.</p>	<p>No authority stands for the proposition that an administratively extended permit cannot be reopened. The two regulations cited by the County are not on point. 23 Cal. Code Regs 2235.4 merely recites that permits are administratively extended until they are reissued, and that a permittee is required to continue abiding by the terms of the existing permit when a new permit has not yet been issued. These provisions recognize the fact that often resource constraints prevent the Regional Board from reissuing permits immediately upon expiration. That is the case with the Los Angeles MS4 permit.</p> <p>Presently, the Regional Board's storm water staff's primary attention is directed to reissuance of the Ventura County MS4 permit. The Regional Board's approach to storm water regulation is generally intended to be relatively consistent across the region. Regional Board staff are working diligently with the Ventura County stakeholders to adopt an MS4 permit that is effective, enforceable, and feasible, while ensuring attainment of water quality standards. Staff does not believe it prudent to duplicate the efforts, by having two identical process run simultaneously (in Ventura and Los Angeles County), and in any event, the Regional Board lacks the staff to undertake such an effort without dramatically delaying the reissuance of both permits. Staff anticipates that many of the stakeholder concerns can be addressed in Ventura before a draft LA MS4 permit is issued, thus minimizing the ultimate time needed to readopt the LA MS4 permit. Staff expects that the Ventura MS4 permit will be presented to the Regional Board for adoption in the Fall of 2007. After that permit is adopted, the LA MS4 reissuance process will commence.</p> <p>Nevertheless, the Marina Del Rey Harbor TMDL, like the SMBBB TMDL, both regulations adopted by the Regional</p>	

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(NPDES NO. CAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
		<p>Board, require compliance with certain of their provisions prior to the time that the LA MS4 permit can be reissued. The only way to ensure compliance is to incorporate the relevant provisions into the MS4 permit. Moreover, federal regulations require that NPDES permits incorporate the terms and conditions of TMDL waste load allocations. While reissuing the permit would be preferable, timely doing so is not feasible. Accordingly, reopening the permit is the only option that would timely implement federal regulations, and the Regional Board's regulations (the TMDLs).</p> <p>The County also cites to 40 C.F.R. Section 126.62(a)(3), which does not exist. Presumably the County intended to reference 122.62, which discusses the circumstances under which a permit may be reopened. The referenced subdivision ((a)(3)) includes the phrase "Permits may be modified during their terms for this cause only as follows". The County construes the words "during their terms" as imposing a limitation upon the ability to reopen a permit.</p> <p>Notably, the permit contains a specific reopener to incorporate modifications to the basin plan. Since the proposed modification is based upon a reopener provided in the permit, either subdivision (a)(7) or (a)(3) could provide authority for the modification, and subdivision (a)(7) does not include the phrase "during their terms". Nevertheless, the permit's reopener does use the phrase "during its term".</p> <p>The County interprets the words "during its term" to infer a prohibition on reopening the permit "after its term". That interpretation is not tenable for a variety of reasons. First, staff notes that the purpose of the limits on an agency's ability to modify a permit "during its term" is to provide the permittee a five-year safe harbor such that, except in certain identified circumstances, the permittee has assurances that</p>	

RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
		<p>during the five-year life of the permit, efforts undertaken to comply with the permit will be reasonably likely to be all that are required of the permittee. To fulfill the purposes of the Clean Water Act, however, the regulations authorize an agency to modify a permit at an interim time if certain circumstances, applicable here, exist. These include implementing newly adopted basin plan provisions (including TMDLs). But, the purpose of the safe harbor has already been achieved during any period of administrative extension. The permittee has already had the benefit of the five year limitation.</p> <p>Second, the County's interpretation would violate public policy, as it would effectively strip a permit's reopeners, and thus the Regional Board's ability to update a permit to implement new regulations, until such time as the Regional Board can adopt a new permit. That would render many discharges beyond the Regional Board's jurisdiction for what may be, depending upon the permit at issue, several years "after its term". That is not consistent with the intent of the legislature in enacting the Clean Water Act. Nowhere is there support for the contention that the public must suffer a public health risk penalty during administrative extension.</p> <p>Third, grammatically, the County's interpretation does not follow. The words "during their terms" are not words of limitation; the limitations in the subdivision are "may be modified ... only as follows". If anything, the words "during their terms" limit the restrictions on modifying the permit. In other words, the plain meaning of the regulation only effects a limitation upon what the Regional Board may do during the term of the permit. The regulation does not address the post-term circumstances. That makes sense. After five years a new permit may be issued that includes any provisions as are appropriate. Thus, focusing on the phrase "during its term" as the County has done compels the</p>	

**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
		<p>contrary conclusion that NO limitations exist on reopening a permit after its term.</p> <p>Staff does not believe that interpretation would be consistent with the intent of the Clean Water Act, either. Staff believes the better interpretation is that "the terms and conditions of the permit" are administratively extended, including the reopeners and limits on reopening the permit. Thus, to the extent the terms of a permit are administratively extended, so too is the term of the permit. Thus the terms of the limits on reopeners apply during administrative extension, as they would during the ordinary term.</p> <p>Reopening the permit at this time is wholly appropriate given that compliance with the summer dry weather provisions of the TMDL is required by March 18, 2007. All co-permittees under the LA County MS4 Permit have been on notice since 2001 that the staff report/fact sheet of the Los Angeles County MS4 permit anticipated the incorporation of TMDLs. Additionally, the implementation provisions of the TMDL state that the regulatory mechanism for implementing the TMDL will be through the MS4 Permit (Basin Plan Table 7-5.1). Moreover, the permit modifications do not impose requirements on any new agencies, but only makes requirements that are already applicable to some of the permittees for Santa Monica Bay Beaches' discharges, equally applicable to those agencies' discharges to Marina Del Rey Harbor.</p>	
1.9	There is no lawful basis for making one permittee responsible for another permittee's compliance.	<p>This comment is the same as Comment 1.B.11 the County made during the proceeding to incorporate the SMBBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p>	NO

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**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.10	<p>The Permit's provisions must be supported by adequate findings. Water Code Sections 13263 and 13377; Code of Civil Procedure Section 1094.5. The proposed amendment does not meet this requirement. To include the proposed amendment in the Permit, the Regional Board must first make the following findings to support the amendment:</p> <ol style="list-style-type: none"> <li>1. A finding identifying the sources of the bacteria at issue.</li> <li>2. A finding that it is technically feasible to comply with the terms of this amendment.</li> <li>3. A finding that the terms of the amendment can be met through cost-effective programs that will be accepted by the public.</li> <li>4. A finding that the amendment will not require the permittees to adopt controls or implement programs that go beyond the maximum extent practicable standard applicable to municipal storm water permits, 33 U.S.C. Section 1342(p)(3)(B)(iii) in order to comply with the amend.</li> <li>5. A finding that the terms of the amendment are reasonably achievable.</li> <li>6. A finding that the Regional Board has considered all factors set forth in the Water Code Section 13241, including (a) the environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto; (b) water quality</li> </ol>	<p>The provision is derived directly from the TMDL, which was not challenged. The permittees are jointly responsible because they are discharging to and from a joint system. There are several safe harbors articulated in the fact sheet that would obviate liability by a particular jurisdiction. Moreover, nothing would prevent a permittee within a relevant watershed from seeking indemnity from another permittee in the same manner as joint tortfeasors; to the extent the permittee has not actually caused the violation.</p> <p>This comment is the same as Comment 11.12 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p> <p>The permit provisions do contain adequate findings, and the provisions of the authorities cited by the commenter have been complied with. The findings requested by the commenter are not necessary. The findings proposed by the County are not required to support an amendment to the permit to implement the State and federally approved TMDL that assigned the waste load allocations to these permittees. This permit modification specifically incorporates those waste load allocations, in the manner specified by the TMDL, to the permittees within the Marina del Rey Watershed.</p> <p>1) No authority is cited for the proposition that the Regional Board must identify sources of bacteria that may cause exceedances before incorporating conditions in NPDES permits to require permittees to prevent the discharge of bacteria in amounts that violate standards. Nevertheless, a source analysis is already set forth in the TMDL regulation at Basin Plan Chapter 7-5.</p>	NO

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**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
	<p>conditions that could reasonably be achieved through the coordinated control of all facts which affect water quality in the areas, and (c) economic considerations.</p> <p>7. A finding that the amendment is reasonable in light of the Water Code Section 13241 facts.</p>	<p>2) The feasibility of the terms of the amendment is not before the Regional Board at this time. The waste load allocations were already established in a prior regulation, and federal regulations require that they be incorporated into the relevant NPDES permits. Those regulations, however, were adopted in contemplation of the fact that they are technically feasible. The MDRH jurisdictions indicated their intent to comply by diverting dry weather discharges to sanitary sewers, two out of three diversions have already occurred.</p> <p>3-5) Both the Defenders of Wildlife decision and the Rancho Cucamonga decision affirm the Regional Board's authority to require strict compliance with water quality standards, including for discharges of storm water from MS4s. The unauthorized non-storm water discharges are subject to the prohibitions contained in Parts 1 and 2.1. The MEP standard is applicable only to discharges of storm water not to non-storm water discharges. The proposed prohibition is applicable to non-storm water discharges.</p> <p>6-7) The reopener will implement a federally mandated and approved TMDL into a federal NPDES permit, consistent with all federal requirements. Neither the LA/Burbank decision, nor any other authority requires an economic analysis under such circumstances. As noted in the LA/Burbank decision, NPDES permits must implement water quality standards irrespective of cost considerations. This action does not exceed the federal standard which is abundantly clear that the discharge of unauthorized non-storm water flows containing pollutants causing or contributing to violation of WQS or WQOs is prohibited.</p> <p>The permit contains discharge prohibitions language and receiving water limitations language that prohibit any discharges that cause or contribute to violation of WQS or WQOs; See Part 1 and 2.1.</p>	

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**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.11	<p>Pursuant to the notice of hearing, the County requests that the following studies, memorandum and documents in the Regional Board's files be brought to the hearing and included in the administrative record:</p> <ol style="list-style-type: none"> <li>1. The Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial Total Maximum Daily Load Dry- and Wet-Weather Implementation Plan.</li> <li>2. Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.</li> <li>3. The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities (State Water Resources Control Board Panel of Experts, June 2006).</li> <li>4. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg (2005), Recreational Water Contact and Illness in Mission Bay, California, Southern California Coastal Water Research Project, Technical Report 449.</li> <li>5. Lee, C. M., T. Lin, C. -C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006) Sediments as a Reservoir for Fecal Indicators Bacteria at Three Santa Monica Bay Beaches, Water Research. In press.</li> <li>6. Noble, R. T., Griffith, J. F., Blackwood, A. D., Fuhrman, J. A., Gregory, J. B., Hernandez, X., Liang, X., Bera, A. A., and Schiff, K., Multitiered Approach Using Quantitative PCR to Track Sources of Fecal Pollution Affecting Santa Monica Bay, California. Applied and Environmental Microbiology (February 2006).</li> <li>7. EPA memorandum, dated November 22, 2002, entitled, Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs.</li> <li>8. Letter dated May 31, 2007, from the Santa Monica BayKeeper and NRDC to the County of Los Angeles</li> </ol>	<p>The following items enumerated in the County's letter are already part of the administrative record and will be brought to the hearing per your request: 1, 2, 3, 7.</p> <p>Items 4, 5, 6, and 9 are not part of the Administrative Record for this proposed action; the County has not submitted these documents to staff. The County had the opportunity to submit evidence for the consideration of the Board by June 25, 2007, and did not timely do so. Nevertheless, the County has been invited to provide an offer of proof as to their contents, establish the documents' relevance, and demonstrate good cause for late inclusion.</p> <p>Item 8 is a 60-day notice of intent to sue the County of Los Angeles and the City of Malibu for violations of the storm water permit. Regional Board staff believes the document has no relevance to this proceeding. The fact that on one occasion NRDC et al may be exercising its rights to file a citizen's suit does not have a bearing upon whether the MDRH TMDL should be incorporated into the MS4 in the same manner as the SMBBB TMDL. Nevertheless, the County has been invited to submit an offer of proof as described above. See also response to Comment 1.5.</p>	NO

**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.12	<p>and the City of Malibu. (The letter reflects that a copy was sent to both Francine Diamond, Chair, and Deborah Smith, Acting Executive Officer of the Regional Board.)</p> <p>9. Ishii, S., Hansen, D. L., Hicks, R. E., Sadowsky, M. J., Beach Sand, and Sediments are Temporal Sinks and Sources of Echerichia Coli in Lake Superior Environ. Sci. Technology, 41 (7). Web Release Date: March 1, 2007.</p> <p>The Regional Board should defer consideration of the proposed amendment at this time. Moreover, any amendment should incorporate an iterative, BMP-based approach to achieve the desired water quality goals.</p>	<p>This comment is similar to Comment 11.23 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006.</p> <p>No compelling reason has been set forth to delay consideration of the proposed amendment. Awaiting the Permit's renewal would be inconsistent with the terms of the TMDL, which requires compliance with dry weather WLAs by March 18, 2007. Furthermore, 40 CFR section 122.44(d) requires that NPDES permits be consistent with the assumptions and requirements of any available waste load allocation. The regulatory provisions of the TMDL state that the primary mechanism for implementing the TMDL will be through the MS4 Permits (Basin Plan Chapter 7-5). Failing to incorporate the waste load allocation into the permit would be contrary to federal regulations. See also response to Comment 1.7.</p>	NO
2.1	<p>This reopener is consistent with the September 14, 2006 amendment of the LA County MS4 NPDES Permit which incorporated the Santa Monica Bay Beaches Bacteria TMDL WLAs for summer dry weather. Although Marina del Rey Watershed is a subwatershed of the Santa Monica Bay Watershed, this reopener is required because there are separate summer dry weather Bacteria TMDLs for each. Santa Monica Baykeeper and Heal the Bay support the</p>	<p>Comment noted.</p>	NO

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RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
2.2	<p>proposed LA MS4 reopener to incorporate the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL WLAs for summer dry weather.</p> <p>All monitored locations in MDR must meet state beach bacteria health standards 100% of the time during summer dry weather from April 1 to October 31. Data collected since April 1, 2007 show at least 10 exceedance days of the MDR Bacteria TMDL requirements from summer dry weather. Seven of these exceedance days were at Mothers Beach, a beach frequented by families.</p>	<p>On April 26, 2007, a section 13225 and 13267 enforcement letter was sent by the Executive Officer to the jurisdictional group requiring the submittal of information regarding the exceedances at Mothers' Beach; the response is currently under review.</p>	NO

12-157

Item No. 12

**COMMENTS AND RESPONSES REGARDING PROCEDURAL  
ISSUES RAISED BY THE COUNTY OF LOS ANGELES**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins  
Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**

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WRITER'S DIRECT NUMBER  
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WRITER'S E-MAIL ADDRESS  
hgest@burhennigest.com

June 20, 2007

VIA FACSIMILE AND U.S. MAIL

Deborah J. Smith  
Interim Executive Officer  
California Regional Water Quality Control Board  
for the Los Angeles Region  
320 West Fourth Street, Suite 200  
Los Angeles, California 90013

2007 JUN 21 PM 2 01  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

RECEIVED

Re: **Proposed Reopening of the County of Los Angeles  
Municipal Storm Water Discharge Permit (National  
Pollutant Discharge Elimination System Permit No.  
CAS004001)**

Dear Ms. Smith:

This office represents the County of Los Angeles and the Los Angeles County Flood Control District (collectively, the "County"). Pursuant to the public notice dated May 11, 2007, this letter is to set forth the objections and concerns of the County to the announced procedures for the hearing on the proposed reopening of the County of Los Angeles Municipal Separate Storm Sewer System Permit.

Please be advised that the County does not waive its right to an adjudicatory hearing in accordance with all applicable statutory and regulatory provisions, including but not limited to Water Code section 13263, Government Code section 11400 et seq., Government Code section 11513, and 23 Cal. Code Reg. § 648 et seq. The County intends to exercise its right to opening and closing statements, presentation of evidence, and examination and cross-examination of witnesses.

The County also has the following specific comments on or objections to the announced procedures:

Deborah J. Smith

June 20, 2007

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1. Interested Parties. The County has no objection to the proposal to place a time limit on testimony by interested parties. The County does not understand this to be a limit on the presentation by the designated parties to the hearing. The County would object to any limitation placed on any presentation to be made by any entity listed as a party in the May 11, 2007, notice.

2. Cross-examination. The County will present its evidence through witness statements and presentations, rather than through a question and answer examination of its witnesses. The County, however, reserves its right to fully cross-examine all witnesses presented by the staff or any party.

3. Non-presentation of Evidence / Administrative Record. The County objects to reliance on or the inclusion in the administrative record of any document not specifically brought to the attention of the Regional Board at the hearing. In that the Regional Board members must make findings of fact and render a decision based on the evidence before them, and that the County has the right to respond to any evidence introduced or relied upon, the documents on which the Regional Board will rely must be presented for review to the Board members at the hearing itself.

The County also objects to inclusion of the administrative records for Regional Board Order No. 01-182 and Resolution Nos. R4-2006-0074 and 2003-012 simply by their reference in the May 11 notice. These administrative records are voluminous and Regional Board members cannot be deemed to know or be aware of the contents of those records. If Regional Board staff intends to rely on or incorporate any document from those administrative records, the document should be specifically identified for the members of the Regional Board and the public, and a copy of that document should be made available for inspection by the public prior to the hearing.

4. Requests for Documents Not Included in the Agenda Package. The County objects to the requirement that a request for staff to bring to the hearing a document not included in the agenda package be submitted not less than five business days before the hearing. The agenda package is not currently prepared and therefore neither the public nor the County presently know whether a particular document is going to be included in the agenda package. Additionally, when the agenda package is prepared, the package will not be readily available to the public, including the County. Thus, a cut-off of no later than five business days before the hearing does not give the public or the County adequate time in which to make requests that staff bring documents to the hearing.

BURHENN & GEST LLP

Deborah J. Smith  
June 20, 2007  
Page 3

5. Procedural Objections. The County objects to the proposal not to entertain procedural objections at the hearing. Objections must be made at the hearing so that they are included in the record. Moreover, 23 Cal. Code § 648.5(b) provides that "procedural motions by any party shall be in order at any time."

6. Time. The County and the Flood Control District must have appropriate time to prepare witnesses and evidence to respond to the presentation made by Regional Board staff. The procedure followed with respect to this permit, providing notice on May 11, 2007, but not identifying witnesses, and proposing not to issue written responses to comments until days before the hearing (assuming that comments will be provided), does not give the County adequate time to prepare and present its evidence.

Thank you for your attention to this matter.

Very truly yours,

  
Howard Gest



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

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

Arnold Schwarzenegger  
Governor

July 23, 2007

Howard Gest  
Burhenn & Gest LLP  
624 South Grand Avenue, Suite 2200  
Los Angeles, California 90017

### PROPOSED REOPENING OF THE COUNTY OF LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT (NPDES PERMIT NO. CAS004001)

Dear Mr. Gest:

Regional Board staff is in receipt of your letter dated June 20, 2007, submitted on behalf of the County of Los Angeles and the Los Angeles County Flood Control District (collectively, the "County"). At the outset, the Regional Board reiterates the limited scope of the proceeding before the Board. Neither the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL (MDRH TMDL), nor the water quality standards that it implements, are before the Board. The only issues are, consistent with the requirements of the previously adopted TMDL, and 40 CFR 122.44(d)(1)(vii)(B), when and how the provisions of the TMDL should be incorporated into the existing permit. As you know, the Board already incorporated essentially identical provisions into the MS4 permit last September when it incorporated the summer dry weather waste load allocations from the Santa Monica Bay Beaches Dry Weather Bacteria TMDL (SMBBB TMDL). The MDRH TMDL includes similar conditions, assumptions, and requirements, and of course, Marina del Rey is a subwatershed of the Santa Monica Bay watershed. Thus, the key question is whether the Board should treat this subwatershed of Santa Monica Bay differently than the remainder of Santa Monica Bay. Each of your objections is responded to in turn, below.

Nature of Hearing. As noted in the May 11, 2007 hearing notice, the hearing will be quasi-adjudicative, pursuant to the regulations set forth at title 23 of the California Code of Regulations, sections 648 et seq., and all other applicable authorities.

Process. The County will be allocated one hour to present every aspect of its case. The County may allocate that time as it wishes, including opening and closing statements, presentation of evidence, examination and cross-examination of witnesses, and presenting any motions it chooses to make.

Time for the County's Presentation. The hearing notice specified that the parties are invited to contact staff not later than June 28, 2007 to discuss how much time they believe is necessary for their presentations, and that staff would endeavor to accommodate reasonable requests. Staff received no timely communication or request from the County in this regard. On July 11, 2007, however, Mr. Mark Pestrella, Assistant Deputy Director of the Department of Public Works, advised the Regional Board that the County would probably ask for an hour, but would only need about 15 minutes. The Regional Board received only two comment letters, exclusive

*California Environmental Protection Agency*

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of the letter to which this responds. Those were from the County of Los Angeles and a joint letter from Santa Monica Baykeeper and Heal the Bay. Based upon the issues under consideration by the Regional Board, and the scope of comments submitted, the County will be allocated one hour. We are confident that the County can adequately present its case in that time. You have not set forth a basis for your objection to a time limit on the County's presentation. Fairness to the public and to other stakeholders, and the orderly administration of the Board's business, requires that reasonable limits be placed to ensure that all can fairly participate.

Cross-examination. The County is free to present its evidence through witness statements and presentations, rather than through a question and answer examination of its witnesses. As noted above, within its allocated time, the County may cross-examine whichever of the witnesses that it chooses.

Administrative Record. As the Court of Appeal recently ruled in *County of Los Angeles v. Los Angeles Regional Water Quality Control Board*, the Regional Board is presumed to have reviewed the record. The Regional Board adopted the MS4 Permit, the SMBBB TMDL, the revisions last September to incorporate the SMBBB TMDL into the MS4 Permit, and the MDRH TMDL. The records from those proceedings are extensive, and no utility is served in transporting each document into the hearing room. Contrary to your suggestion, each and every document need not be handed to each Board Member for individual identification and consideration during the hearing.

The proposed findings of fact and proposed order have been publicly available for some time, and both the County and the Regional Board are well aware of the contents of the record, and the materials that support the proposed action. All of the records have been made available for public inspection, as noted in the May 11, 2007 hearing notice. We note that the County has not chosen to review the Regional Board's records as of the date of this letter. Of course, most of those documents are already in your possession both in your litigation file relating to the above-referenced court decision, and your clients' Storm Water permitting, monitoring, and compliance files, which make up a large percentage of the relevant documents.

Requests for Documents Not Included in the Agenda Package. Your suggestion that you have inadequate time to designate documents because the contents of the agenda package have not yet been identified is incorrect. Nothing in the hearing notice precludes you from identifying documents prior to the time the agenda package is prepared and circulated. You have had from May 11, 2007 to the present (indeed, until five days before the hearing) to review the record and identify the documents upon which you wish to rely. The fact that the documents in the agenda package will already be at the hearing, and therefore need not be separately requested, does not prejudice your evaluation of the documents upon which you wish to rely. As you know, the agenda package consists of the materials most relevant to an educated understanding of the proposed action. Both the limited scope of the issues presently before the Board, and the volume of the documents in the administrative record, make infeasible and unnecessary the duplication of all of the administrative record's documents for each Board member, stakeholder, and member of the interested public, not to mention a waste of time, resources, and for that matter, paper. The specific documents to be included in the agenda

package are not identified in the hearing notice because the decision as to whether any particular document should be included often depends upon the comments received, requests of Board Members, and staff judgment about what materials are appropriate, given communications with stakeholders prior to the Board meeting. As you and the County are well aware, however, the agenda package always includes at least the proposed order and findings, the Fact Sheet, the comments received, and the staff's responses to comments. Nevertheless, please be advised that the following documents will also be included in the Agenda Package and therefore you need not request that staff bring them to the hearing:

1. Executive Summary
2. Summary of proposed deletions
3. The findings and provisions, the response to comments, and the PowerPoint presentation from the September 2006 reopening of the County of Los Angeles MS4 permit to include the summer dry weather wasteload allocations from the Santa Monica Bay Beaches Dry Weather Bacteria TMDL.

Of course, this list does not suggest that additional documents may not also be forwarded to the Board Members (including, for instance, this and other subsequent correspondence).

Since staff does not know which documents you believe are relevant to your presentation, staff cannot designate them for you. It is therefore appropriate that the County or any other party intending to rely upon particular documents identify them so staff can locate them and make them available. We note you lodged a similar objection during the proceeding to incorporate the SMBBB TMDL into the MS4 Permit last September. In response to your objections, staff ensured each and every document was available during the hearing. Yet, you did not utilize a single such document. We do not intend to repeat that exercise. We believe you have had adequate time to determine the documents from the record upon which the County wishes to rely during the hearing, and to advise staff accordingly.

Procedural Objections. Your objections and this letter are already part of the administrative record of this proceeding. These objections are being addressed in this letter, and therefore need not be re-raised at the hearing. During the SMBBB TMDL reopener, the Regional Board entertained approximately one hour of process objections lodged by you on behalf of the County, many of which merely duplicated the objections raised in writing prior to the Board hearing. The time allocated for such objections was at the expense of many members of the public who were unable to stay past the contemplated and ordinary time for the meeting. As noted above, the County may make any motions it chooses to make, during its allocated time.

Time. Not only was notice provided on May 11, 2007, but draft permit language, draft findings, and a draft fact sheet were also published, setting forth the precise action proposed, and the proposed reasons for that action. In other words, irrespective of the words used during the PowerPoint presentation typically made at the hearing, or the identity of the staff member selected to make the presentation, the documents released on May 11<sup>th</sup> fully identify the issues before the Board, and scope of the staff's proposals.

As you know, this proceeding is essentially a replay of the reopener to incorporate the SMBBB TMDL into the MS4 Permit last September. Indeed, the County's comment letter in large



July 23, 2007

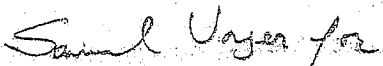
respects merely reiterates the comments it submitted during the previous proceeding in September. The response to comments will be available in short order, and as you might anticipate, staff's responses will not be significantly different than the responses from last September. The County is well aware of the matters at issue, and is represented by able counsel who is well-qualified to present the County's perspective on the significant issues under the Board's consideration. Should you desire a copy of the joint letter submitted by Santa Monica Baykeeper and Heal the Bay, please advise. Nevertheless, for your information, the following staff members may participate in presenting this item to the Board:

- Deborah Smith
- Samuel Unger
- Renee Purdy DeShazo
- Rebecca Christmann
- Xavier Swamikannu
- Carlos Urrunaga

Please also be advised that staff may call Dr. Mark Gold as a rebuttal witness to the County's presentation.

If you have any questions about the contents of this letter, please contact me at (213) 576-6609 or Michael Levy, Senior Staff Counsel at (916) 341-5193.

Sincerely,



Deborah J. Smith  
Interim Executive Officer

cc: Mr. Michael Levy Esq., Office of Chief Counsel, State Water Resources Control Board  
Mr. David E. Janssen, Chief Administrative Officer, County of Los Angeles



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

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Arnold Schwarzeneg.  
Governor

July 20, 2007

Mr. Mark Pestrella  
Assistant Deputy Director  
County of Los Angeles  
Department of Public Works  
P.O. Box 1460  
Alhambra, CA 91802-1460

### COUNTY OF LOS ANGELES REQUEST FOR SUBMITTAL OF EVIDENCE ON THE PROPOSED REOPENING OF THE COUNTY OF LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT (NPDES PERMIT NO. CAS004001)

Dear Mr. Pestrella:

In your comment letter dated June 25, 2007, you requested that Regional Board staff bring the following documents to the hearing and include them in "the administrative record." The following documents are in the administrative record and will be brought to the hearing per your request:

1. Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial Total Maximum Daily Load Dry- and Wet-Weather Implementation Plan.
2. Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.
3. EPA memorandum, dated November 22, 2002, entitled; Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs.
4. Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities (State Water Resources Control Board Panel of Experts, June 2006).

The following documents are not in the administrative record:

1. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg (2005), Recreational Water Contact and Illness in Mission Bay, California, Southern California Coastal Water Research Project, Technical Report 449.
2. Lee, C. M., T. Lin, C. -C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006), Sediments as a Reservoir for Fecal Indicators Bacteria at Three Santa Monica Bay Beaches, Water Research.
3. Noble, R. T., Griffith, J. F., Blackwood, A. D., Fuhrman, J. A. Gregory, J. B. Hernandez, X., Liang, X., Bera, A. A., and Schiff, K., Multitiered Approach Using Quantitative PCR to

*California Environmental Protection Agency*

Recycled Paper

12-75

July 20, 2007

Track Sources of Fecal Pollution Affecting Santa Monica Bay, California. Applied and Environmental Microbiology (February 2006).

4. Ishii, S., Hansen, D. L. Hicks, R. E., Sadowsky, M. J., Beach Sand and Sediments are Temporal Sinks and Sources of Echerichia Coli in Lake Superior Environ. Science Technology. 41 (7). Web Release Date: March 1, 2007.

As set forth in the hearing notice, the deadline to submit evidence was June 25, 2007. Please provide both an explanation as to why the documents were not timely submitted, and an offer of proof about what each is intended to establish if the Regional Board were to admit it. Please provide this information by July 26, 2007.

Finally, as to the letter dated May 31, 2007 from the Santa Monica Baykeeper and NRDC to the County of Los Angeles and the City of Malibu, while the Regional Board staff received a copy of the letter, it was received after this reopening was proposed, is not a part of this administrative record, and we do not believe it to be relevant to this proceeding. Nevertheless, you may submit an offer of proof for this letter, as described above, and we will consider your request further.

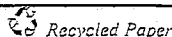
Sincerely,



Deborah J. Smith  
Interim Executive Officer

cc: Mr. Michael Levy Esq., Office of Chief Counsel, State Water Resources Control Board  
Mr. David E. Janssen, Chief Administrative Officer, County of Los Angeles

*California Environmental Protection Agency*



*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.* 12-78

**Item No. 12**

**PREVIOUS INFORMATION SUBMITTED TO THE BOARD IN  
SEPTEMBER 2006 FOR THE REOPENING OF THE COUNTY OF  
LOS ANGELES MS4 PERMIT TO INCLUDE SUMMER DRY  
WEATHER WASTE LOAD ALLOCATIONS FROM THE SANTA  
MONICA BAY BEACHES DRY WEATHER BACTERIA TMDL**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations from the  
Marina Del Rey Harbor Mothers' Beach and Back Basins  
Bacteria TMDL**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**

Item No. 12

**SEPTEMBER 14, 2006 POWERPOINT PRESENTATION**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations for Cities draining to Santa Monica Bay  
(Santa Monica Bay Beaches Bacteria TMDL)**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**

Los Angeles County Municipal Storm Water  
Permit: Limited Reopener to Incorporate  
Summer Dry Weather Bacteria Total Maximum  
Daily Load For Santa Monica Bay Beaches

497<sup>th</sup> Public Meeting,  
LA Water Board, Los Angeles

Xavier Swamikannu, D.Env.  
September 14, 2006

**Municipal Storm Water Permitting  
Background**

- LA County MS4 Permit – 1990
  - Phased watersheds
  - Identify Best Management Practices
  - Basic chemical monitoring
  
- LA County MS4 Permit – 1996
  - Adopt Storm Water Ordinances
  - Develop countywide model programs
  - Receiving water monitoring

## Background (cont'd)

- LA County MS4 Permit – 2001
  - Compliance with water quality standards
  - Mitigation criteria for new development and redevelopment
  - Regional monitoring, tributary monitoring and bioassessment
  - Controls to reduce trash
- LA County MS4 Permit Reopener – 2006 (proposed)
  - Incorporate prohibition for summer dry weather non storm water flow containing bacteria to Santa Monica Bay beaches

## Bacteria TMDL Approval

- LA Water Board adopted TMDL on Jan 24, 2002
- State Water Board approved on Sept 19, 2002
- Office of Administrative Law approved on Dec 9, 2002
- U.S. EPA approved on Jun 19, 2003
- Dry Weather Bacteria TMDL became effective on Jul 15, 2003

## Bacteria Total Maximum Daily Load (TMDL)

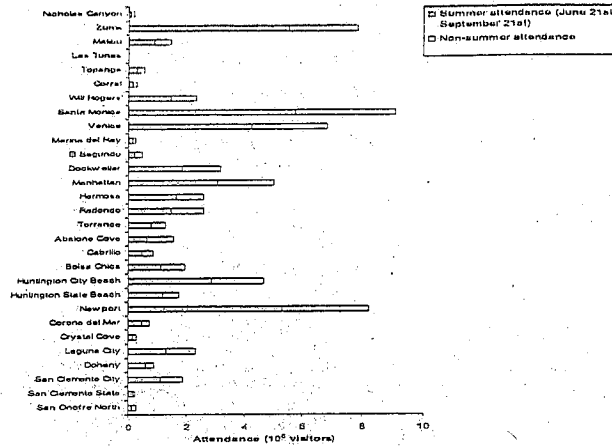
- Covers Santa Monica Bay beaches
  - LA/Ventura County line to Outer Cabrillo Beach
- Numeric targets are fecal indicator bacteria objectives adopted by Water Board in 2001
  - Same as "AB 411" minimum bacteriological standards for protection of public health at beaches (CCR Tit. 17 §7958)
- Summer Dry Weather Waste Load Allocations
  - No exceedances of objectives during summer dry weather (Apr 1 to Oct 31) at Santa Monica Bay beaches
- Compliance with WLAs by Jul 15, 2006

## Bacteria TMDL Implementation Mechanisms

- The TMDL adopted in 2002 states,  
"[t]he regulatory mechanisms used to implement the TMDL will include primarily the Los Angeles County Municipal Storm Water NPDES Permit, the Caltrans Storm Water Permit, the three NPDES permits for the POTWs, and the authority vested in the Executive Officer via 13267 of the Porter-Cologne Water Quality Control Act."



## Beach Attendance (2000)



## Permitting Options

- Considered
  - A. Requiring amendments to the Storm Water Quality Management Program (iterative approach)
  - B. Prohibition of Non Storm Water Discharges Containing Bacteria (summer dry weather)
  - C. Combined Non Storm Water/ Storm Water Permit for the MS4 (recognizing separate criteria)
  - D. Separate Individual Permit for the MS4 for Non Storm Water Discharges
  - E. No Action

## Proposed Amendments

- **Part 1.B. Discharge Prohibition**  
Discharges of Summer Dry Weather flows from MS4s into Santa Monica Bay that cause or contribute to exceedances of the bacteria Receiving Water Limitations in Part 2.5 below are prohibited.
- **Part 2.5 Receiving Water Limitations**  
During Summer Dry Weather there shall be no discharges of bacteria from MS4s into the Santa Monica Bay that cause or contribute to exceedances in the Wave Wash of the applicable bacteria objectives. The applicable bacteria objectives include both the single sample and geometric mean bacteria objectives set to protect the Water Contact Recreation (REC-1) beneficial use, as set forth in the Basin Plan.

## Proposed Amendments (cont'd)

- **Part 2.1 Receiving Water Limitations**  
Except as provided in Part 2.5 below, discharges from the MS4 that cause or contribute to the violation of Water Quality Standards or water quality objectives are prohibited.

## Public Comment

### Opportunity for Comment

- Comment Period (May 18 - July 13)
- Workshop (July 21)
- Comment Period (July 26 – September 4)
- Board Hearing (September 14)

## Responsiveness

### Discharge Prohibition

- Pt 1.B. Discharge of summer dry weather and winter dry weather flows containing bacteria in excess of waste load allocations specified in the Santa Monica Bay beaches Dry Weather TMDL is prohibited.  
[originally proposed for July 13 Public Hearing]
- Pt 1.B. Discharges of Summer Dry Weather flows from MS4s into Santa Monica Bay that cause or contribute to exceedances of the bacteria Receiving Water Limitations in Part 2.5 below are prohibited.  
[changes proposed today from July 28 circulated version highlighted]

## Legal and Regulatory Basis

- Storm water discharge permits for MS4s....
  - (ii) shall include a requirement to effectively prohibit non-storm water discharges into the storm sewers; and
  - (iii) shall require controls to reduce the discharge of pollutants from storm water to the maximum extent practicable, including management practices, control techniques and systems, design and engineering methods, and such other provisions as the Administrator or the State determines appropriate for the control of such pollutants.

(Clean Water Act §402(p) (3) (B)).

## Legal and Regulatory Basis (cont'd)

- The Permitting Authority shall ensure that:
  - (A) The level of water quality to be achieved by limits on point sources established under this paragraph is derived from, and complies with all applicable water quality standards; and
  - (B) Effluent limits developed to protect a narrative water quality criterion, a numeric water quality criterion, or both, are consistent with the assumptions and requirements of any available waste load allocation for the discharge prepared by the State and approved by EPA pursuant to 40 CFR 130.7.

40 CFR 122.44(d)(1)(vii)

## TMDL Storm Water Policy

- *Establishing TMDL Waste Load Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs* (U.S. EPA Memorandum, Nov. 2002)
  - EPA expects that most water quality based effluent limits for NPDES-regulated municipal and small construction storm water discharges will be in the form of BMPs

[emphasis added]

## Storm Water Permitting Policy

- *Interim Permitting Approach for Water Quality Based Effluent Limitations in Storm Water Permits* (U.S. EPA Memorandum August 1996, 61 Fed. Reg. 43761)
  - Uses best management practices (BMPs) in first round permits, and expanded better-tailored BMPs in subsequent permits, where necessary, to provide for the attainment of water quality standards
  - Recognizes the need for an iterative approach to control pollutants in storm water discharges.

[emphasis added]

## Regulatory Framework

- Non storm water flows from point sources
  - Non storm water flows = dry weather flow
  - Subject to NPDES permit requirements at 40 CFR 122.3(c)

## Significant Comments Received

- Comment 1: Await Permit Renewal  
Response: The deadline for the summer dry weather bacteria WLA has passed and the Water Board is obligated to make the WLA enforceable.
- Comment 2: Use a Memorandum of Understanding  
Response: An MOU is not a federally authorized and enforceable document under the NPDES regulatory framework and is not consistent with the bacteria TMDL.
- Comment 3: Require changes to the Storm Water Quality Management Program through the iterative approach  
Response: Summer dry weather flows are not subject to US EPA's iterative approach which is applicable to storm water discharges, and is not consistent with the bacteria TMDL.

## Significant Comments (cont'd)

- Comment 4: Express concern about including numerical limits in a storm water permit rather than using maximum extent practicable (MEP) standard.

Response: The summer dry weather bacteria WLA is enforced as a discharge prohibition, and receiving water limitations, not a numerical effluent limit. The MEP standard is for storm water discharges.

- Comment 5: Proposed action is inconsistent with Malibu Creek and Ballona Creek Bacteria TMDLs

Response: MS4 discharges into Ballona Creek and Malibu Creek are subject to their respective TMDL compliance schedules.

Note - Several editorial and text clarifications have been made to the Findings in response to comments received

## Staff Recommendation

### Limited Purpose

- Implement provisions of the Santa Monica Bay beaches Bacteria TMDL and make the summer dry weather WLA enforceable.

### Recommendation

- Adopt the proposed amendments to Pt.1, Discharge Prohibitions, and Pt. 2, Receiving Water Limitations, to prohibit the discharge of summer dry weather flows that result in an exceedance of REC-1 standards.
- Adopt Pt. 5 Definitions of terms

Item No. 12

**ADOPTED FINDINGS TO INCORPORATE THE SMBBB TMDL  
INTO THE LA COUNTY MS4 PERMIT**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations for Cities draining to Santa Monica Bay  
(Santa Monica Bay Beaches Bacteria TMDL)**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**



**(FINDINGS RELATED TO THE INCORPORATION OF THE SANTA MONICA BAY BEACHES DRY WEATHER BACTERIA TMDL)**

28. The Regional Board adopted the Santa Monica Bay Beaches Dry Weather TMDL for Bacteria (hereinafter "Dry Weather Bacteria TMDL") on January 24, 2002. The TMDL was subsequently approved by the SWRCB, the Office of Administrative Law (OAL), and the United States Environmental Protection Agency (USEPA) and became effective on July 15, 2003.
29. The Waste Load Allocations in the Dry Weather Bacteria TMDL are expressed as the number of allowable days that the Santa Monica Bay beaches may exceed the Basin Plan water quality objectives for protection of Water Contact Recreation (REC-1) in marine waters, specifically the water quality objectives for bacteria. Appropriate modifications to this order are therefore included in Parts 1 (Discharge Prohibitions) and 2 (Receiving Water Limitations), pursuant to 40 CFR 122.41(f) and 122.62, and Part 6.1.1 of this Order. Additionally, 40 CFR section 122.44(d)(1)(vii)(B) requires that NPDES permits be consistent with the assumptions and requirements of any available waste load allocation. Tables 7-4.1, 7-4.2a, and 7-4.3 of the Basin Plan set forth the pertinent provisions of the Dry Weather Bacteria TMDL. They require that during Summer Dry Weather there shall be no exceedances in the Wave Wash of the single sample or the geometric mean bacteria objectives set to protect the Water Contact Recreation (REC-1) beneficial use in marine waters. Accordingly, a prohibition is included in this order barring direct discharges from a MS4 to Santa Monica Bay that result in exceedance of these objectives. Since the TMDL and the waste load allocations contained therein are expressed as receiving water conditions, Receiving Water Limitations have been included in this order that are consistent with and implement the zero exceedance day waste load allocations.
30. Pursuant to Federal Regulations at 40 CFR 124.8, and 125.56, a Fact Sheet was prepared to provide the basis for incorporating the Dry Weather Bacteria TMDL into this Order. The Fact Sheet is hereby incorporated by reference into these findings.
31. The iterative approach to regulating municipal storm water is not an appropriate means of implementing the SMB Summer Dry Weather WLAs for any and all of the following reasons: (a) The WLAs do not regulate the discharge of storm water; (b) The harm to the public from violating the WLAs is dramatic both in terms of health impacts to exposed beachgoers, and the economic cost to the region associated with related illnesses; (c) Despite the fact that more than a decade and a half has passed since MS4 permittees were required to eliminate illicit connections/discharges (IC/ID) into their MS4s, their programs have not eliminated standards violations at the beaches; and (d) Few permittees have ever documented revisions to their SQMP to address chronic exceedances of water quality standards.

32. The Receiving Water Limitations have been revised to implement the Summer Dry Weather waste load allocations set forth in Basin Plan Table 7-4.1 (attached as Appendix A to this order). These Receiving Water Limitations apply at the compliance monitoring sites identified in the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* dated April 7, 2004.<sup>1</sup> Compliance with the Receiving Water Limitations shall be determined using shoreline monitoring data obtained in conformance with the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* dated April 7, 2004.
33. If the Receiving Water Limitations are exceeded at a compliance monitoring site, the Regional Board will generally issue an appropriate investigative order pursuant to Cal. Water Code § 13267 or § 13225 to the Permittees and other responsible agencies or jurisdictions within the relevant subwatershed to determine the source of the exceedance. Following these actions, Regional Board staff will generally evaluate the need for further enforcement as follows:
- a) If the Regional Board determines that the exceedance did not result from discharges from the MS4, then the MS4 Permittees would not be responsible for violations of these provisions.
  - b) If the Regional Board determines that Permittees in the relevant subwatershed have demonstrated that their MS4 does not discharge dry weather flow into Santa Monica Bay, those Permittees would not be responsible for violations of these provisions even if the Receiving Water Limitations are exceeded at an associated compliance monitoring site.
  - c) If the Regional Board determines that Permittees in the relevant subwatershed have demonstrated that their MS4 summer dry weather discharge into Santa Monica Bay is treated to a level that does not exceed either the single sample or the geometric mean bacteria objectives, those Permittees shall not be responsible for violations of these provisions even if the Receiving Water Limitations are exceeded at an associated compliance monitoring site.
  - d) If the Regional Board determines that one or more Permittees have caused or contributed to violations of these Receiving Water Limitations, the Regional Board will consider appropriate enforcement action, including a cease and desist order with or without a time schedule for compliance, or other appropriate enforcement action depending upon the circumstances and the extent to which the Permittee(s) has endeavored to comply with these provisions.

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1. If the Regional Board determines that publicly owned storm drains that flow during dry weather are situated at additional shoreline locations, the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* may be revised by the Regional Board Executive Officer approval, after providing the opportunity for public comment, to include these locations as compliance monitoring sites.

34. A Permittee would not be responsible for violations of these provisions if the Executive Officer determines that the Permittee has adequately documented through a source investigation of the subwatershed, pursuant to protocols established under Cal. Water Code 13178, that bacterial sources originating within the jurisdiction of the Permittee have not caused or contributed to the exceedance of the Receiving Water Limitations.
35. Water Code section 13389 exempts the Regional Board from compliance with Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code prior to the adoption of waste discharge requirements. Therefore the Regional Board is not required to prepare environmental documents to evaluate this permit modification. Nevertheless, the Regional Board has considered the policies and requirements set forth in Chapters 1 through 2.6 of CEQA, and further, has considered the final substitute environmental documents for the Santa Monica Bay Beaches Bacteria TMDL.

Item No. 12

**ADOPTED ORDER LANGUAGE TO INCORPORATE THE SMBBB  
TMDL INTO THE LA COUNTY MS4 PERMIT**

**Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations for Cities draining to Santa Monica Bay  
(Santa Monica Bay Beaches Bacteria TMDL)**

**County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)**

Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Santa Monica, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, West Hollywood, Westlake Village, and Whittier, in order to meet the provisions contained in Division 7 of the CWC and regulations adopted thereunder, and the provisions of the CWA, as amended, and regulations and guidelines adopted thereunder, shall comply with the following:

### Part 1. DISCHARGE PROHIBITIONS

Part 1. A. The Permittees shall effectively prohibit non-storm water discharges into the MS4 and watercourses, except where such discharges:

1. Are covered by a separate individual or general NPDES permit for non-storm water discharges; or
2. Fall within one of the categories below, and meet all conditions when specified by the Regional Board Executive Officer:
  - a) Category A - Natural flow:
    - (1) Natural springs and rising ground water;
    - (2) Flows from riparian habitats or wetlands;
    - (3) Stream diversions, permitted by the State Board; and
    - (4) Uncontaminated ground water infiltration [as defined by 40 CFR 35.2005(20)].
  - b) Category B - Flows from emergency fire fighting activity.
  - c) Category C - Flows incidental to urban activities:
    - (1) Reclaimed and potable landscape irrigation runoff;
    - (2) Potable drinking water supply and distribution system releases (consistent with American Water Works Association guidelines for dechlorination and suspended solids reduction practices);
    - (3) Drains for foundations, footings, and crawl spaces;
    - (4) Air conditioning condensate;
    - (5) Dechlorinated/debrominated swimming pool discharges;
    - (6) Dewatering of lakes and decorative fountains;
    - (7) Non-commercial car washing by residents or by non-profit organizations; and



## (8) Sidewalk rinsing.

The Regional Board Executive Officer may add or remove categories of non-storm water discharges above. Furthermore, in the event that any of the above categories of non-storm water discharges are determined to be a source of pollutants by the Regional Board Executive Officer, the discharge will no longer be exempt from this prohibition unless the Permittee implements conditions approved by the Regional Board Executive Officer to ensure that the discharge is not a source of pollutants. Notwithstanding the above, the Regional Board Executive Officer may impose additional prohibitions of non-storm water discharges in consideration of antidegradation policies and TMDLs.

Part 1. B. Discharges of Summer Dry Weather<sup>1</sup> flows from MS4s into Santa Monica Bay<sup>2</sup> that cause or contribute to exceedances of the bacteria Receiving Water Limitations in Part 2.5 below are prohibited.<sup>3</sup>

## Part 2. RECEIVING WATER LIMITATIONS

1. Except as provided in Part 2.5 below, discharges from the MS4 that cause or contribute to the violation of Water Quality Standards or water quality objectives are prohibited.
2. Discharges from the MS4 of storm water, or non-storm water, for which a Permittee is responsible for, shall not cause or contribute to a condition of nuisance.
3. The Permittees shall comply with Part 2.1. and 2.2. through timely implementation of control measures and other actions to reduce pollutants in the discharges in accordance with the SQMP and its components and other requirements of this Order including any modifications. The SQMP and its components shall be designed to achieve compliance with receiving water limitations. If exceedances of Water Quality Objectives or Water Quality Standards (collectively, Water Quality Standards) persist, notwithstanding implementation of the SQMP and its components and other requirements of this permit, the Permittee shall assure compliance with discharge prohibitions and receiving water limitations by complying with the following procedure:

<sup>1</sup> Dry Weather shall be determined as set forth in the *Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* dated April 7, 2004, or any amendments thereto.

<sup>2</sup> Santa Monica Bay encompasses the coastal waters from Point Dume to Point Fermin and seaward to the 500-meter depth contour. It includes all beaches from the Los Angeles/Ventura County line south to the Outer Cabrillo Beach located just south of the Palos Verdes Peninsula.

<sup>3</sup> Responsibility for such prohibited discharges is determined as indicated in Footnote 3 part (3) of Table 7-4.1 of the Basin Plan. All Permittees within a subwatershed of the Santa Monica Bay Watershed Management Area are jointly responsible for compliance with the limitations imposed in Table 7-4.1.

- a) Upon a determination by either the Permittee or the Regional Board that discharges are causing or contributing to an exceedance of an applicable Water Quality Standard, the Permittee shall promptly notify and thereafter submit a Receiving Water Limitations (RWL) Compliance Report (as described in the Program Reporting Requirements, Section I of the Monitoring and Reporting Program) to the Regional Board that describes BMPs that are currently being implemented and additional BMPs that will be implemented to prevent or reduce any pollutants that are causing or contributing to the exceedances of Water Quality Standards. This RWL Compliance Report may be incorporated in the annual Storm Water Report and Assessment unless the Regional Board directs an earlier submittal. The RWL Compliance Report shall include an implementation schedule. The Regional Board may require modifications to the RWL Compliance Report.
  - b) Submit any modifications to the RWL Compliance Report required by the Regional Board within 30 days of notification.
  - c) Within 30 days following the approval of the RWL Compliance Report, the Permittee shall revise the SQMP and its components and monitoring program to incorporate the approved modified BMPs that have been and will be implemented, an implementation schedule, and any additional monitoring required.
  - d) Implement the revised SQMP and its components and monitoring program according to the approved schedule.
4. So long as the Permittee has complied with the procedures set forth above and is implementing the revised SQMP and its components, the Permittee does not have to repeat the same procedure for continuing or recurring exceedances of the same receiving water limitations unless directed by the Regional Board to develop additional BMPs.
  5. During Summer Dry Weather there shall be no discharges of bacteria from MS4s into the Santa Monica Bay that cause or contribute to exceedances in the Wave Wash, of the applicable bacteria objectives. The applicable bacteria objectives include both the single sample and geometric mean bacteria objectives set to protect the Water Contact Recreation (REC-1) beneficial use, as set forth in the Basin Plan.<sup>4</sup>

<sup>4</sup> Samples collected for determining compliance with the receiving water limitations of Part 2.5 shall be processed in accordance with the sampling procedures and analytical methodology set forth in the Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan dated April 7, 2004.

Item No. 12

EXCERPTS FROM RESPONSE TO COMMENTS AUGUST 4, 2006  
(Only County of Los Angeles comments and responses)

Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations for Cities draining to Santa Monica Bay  
(Santa Monica Bay Beaches Bacteria TMDL)

County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)



RESPONSE TO COMMENTS RECEIVED IN ADVANCE OF THE JULY 13, 2006 BOARD MEETING  
 ON THE PROPOSED REOPENER OF  
 THE COUNTY OF LOS ANGELES MUNICIPAL STORM WATER DISCHARGE PERMIT  
 (NPDES PERMIT NO. CAS004001)  
 AUGUST 4, 2006

Table 1. List of commenters submitting written comments in advance of the July 13, 2006 Board Meeting.

Comment #	Commenter
1	City of Arcadia (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
2	City of Bell (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
3	City of Bellflower (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
4	City of Carson (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
5	City of Claremont (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
6	City of Commerce (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
7	City of Glendora (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
8	City of Hawaiian Gardens (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
9	City of Inglewood
10	City of Lawndale (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
11	County of Los Angeles
12	City of Los Angeles
13	City of Monterey Park (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
14	City of Redondo Beach
15	City of Rolling Hills Estates
16	City of Rolling Hills
17	City of South Gate (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
18	City of South Pasadena (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
19	City of Temple City (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
20	City of Whittier (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
21	Executive Advisory Committee
22	CPR
23	Latham and Watkins for Pepperdine
24	Latham and Watkins for Playa Capital Co.
25	NRDC
26	City of Oxnard (Outside jurisdiction of Santa Monica Bay; therefore not subject to requirements of amendment)
27	Playa Capital Co.
28	Richards Watson and Gershon
29	Rutan and Tucker
30	City of Gardena

Note: The comment # above corresponds to the first number in the Comment Number field in Table 2.

RESPONSE TO COMMENTS RECEIVED IN ADVANCE OF THE JULY 13, 2006 BOARD MEETING  
 ON THE PROPOSED REOPENER OF  
 THE COUNTY OF LOS ANGELES MUNICIPAL STORM WATER DISCHARGE PERMIT  
 (NPDES PERMIT NO. CAS004001)  
 AUGUST 4, 2006

Table 2. Responsiveness summary for written comments submitted before the close of the public comment period.

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.1	<p>The proposed re-opener effectively proposes the establishment of a numeric limit on the discharge of a pollutant, which is contrary to USEPA policy as it relates to municipal NPDES permits. The USEPA has stated that municipal NPDES permits are to address pollutants, including those subject to total maximum daily loads (TMDLs) through the use of best management practices (BMPs) to be implemented on an iterative basis. Although the limitation is couched as a discharge prohibition (i.e. - an illicit discharge) and also, inexplicitly, as a receiving water limitation, it still qualifies as a numeric limit because it includes a "waste load allocation" (i.e. - a numeric target for bacteria).</p>	<p>The USEPA memorandum referenced is not a policy, but a "not binding" "guidance" memorandum containing "recommendations". It notes that "there may be other approaches that would be appropriate in particular situations," and that USEPA would make each permitting decision on a case-by-case basis considering the particular circumstances of each. (See Memorandum: Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs, dated 1/22/02, from Director Robert H. Wayland, III, to Director James Hanlon, pp. 5-6.)</p>		
		<p>Furthermore, the proposed permit amendment is not contrary to the recommendations in the memorandum. The memorandum's recommendations relate specifically to municipal "storm water" discharges. Specifically, the memorandum states that EPA recognizes that "storm water discharges are due to storm events that are highly variable in frequency and duration and are not easily characterized," and therefore numeric effluent limits may be infeasible or inappropriate. The provisions of this amendment, however, do not relate to storm events, and in fact, storm events are specifically excluded from these provisions and the TMDL that they implement. This reopener only relates to dry weather discharges, which are by definition not storm days, but rather days with less than 0.1 inch of rain. Such non storm water discharges are primarily nuisance flows, such as watering lawns, washing cars, and other incidental and nominal discharges of urban living that flow into the storm drains. The provisions are included as receiving water limitations because the TMDL's waste load allocations are expressed</p>		

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1.2.	The Regional Board's inclusion of a numeric limit in the Los Angeles MS4 NPDES Permit preempts the State Water Resources Control Board's effort to establish a policy on numeric limits in MS4 Permits.	<p>as "exceedance days" in the water body, i.e., receiving water limitations.</p> <p>The permit is abundantly clear that unauthorized non storm water discharges containing pollutants are prohibited. Similar prohibitions were contained in the 1990 and 1996 LA MS4 permits.</p> <p>Finally, it is anticipated that most compliance will occur through diversion of dry weather flows to sanitary sewers. In that respect, there is nothing to iterate. Either the responsible jurisdictions have diverted or they have not.</p> <p>Since a regional board's orders or basin plan provisions would always be superseded by a conflicting state policy for water quality control, it is thus impossible for an action of a regional board to "preempt" such a state policy. The commenter is essentially arguing that the Regional Board should await a potential policy that the State Board might issue in the future. The comment is not appropriate.</p> <p>Regional boards cannot forgo regulating the dischargers in their region merely because the State Board might adopt a relevant policy with as yet undetermined provisions sometime in the future. There is no indication that any storm water policy that the State might issue would conflict with these permit provisions in any event. If that occurred, this permit could readily be reopened to make its provisions consistent with any such state policy.</p> <p>Furthermore, the commenter's reference is to the establishment of a policy of numeric limits for storm water discharges in MS4 permits. This action deals with non-storm water discharges.</p>		
1.3	The proposed new language for Part 1.B, which addresses non-storm water discharge prohibitions of the current Los Angeles County MS4 is written in a manner that applies the dry weather waste load allocation (WLA) for bacteria for Santa Monica Beaches to all Los Angeles County MS4	<p>The permit language for Part 1. B. and Part 2.5 has been revised to clarify that the requirements apply to jurisdictions in the Santa Monica Bay Watershed Management Area and that the Receiving Water Limitations established to implement the Santa Monica</p>	Yes	Permit language, Part 1. B. and Part 2.5



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1.4	<p>Permittees.</p> <p>The addition of paragraph 5 to Part 2., "Receiving Water Limitations," contradicts the purpose and intent of this section, which is to provide an iterative process for resolving continued exceedences of water quality standards. There is no opportunity for the municipal Permittee to either increase existing BMPs or add new ones in its Storm Water Quality Management Plan (SQMP) to attempt to resolve exceedance. Paragraph 5 simply says that a waste load allocation must be met - period.</p>	<p>Bay Beaches Bacteria TMDL summer dry weather waste load allocations apply at the compliance monitoring sites identified in the <i>Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan</i> dated April 7, 2004.</p> <p>The Santa Monica Bay Beaches Dry Weather Bacteria TMDL has been in effect for three years, since July 2003. Responsible jurisdictions have been aware of the implementation deadlines in the TMDL for 4½ years, since Regional Board adoption of the TMDL in January 2002. Responsible jurisdictions were also aware that the primary implementation mechanism for the requirements of the TMDL would be the Los Angeles County MS4 Permit. Therefore, jurisdictions have had 4½ years to apply an iterative process for resolving exceedences of water quality standards.</p> <p>Furthermore, early in the process key jurisdictions indicated that their approach to compliance with dry weather TMDL requirements would be to divert storm drain discharges to sanitary sewers. Diversions are a proven method for reducing bacteria at the beach; therefore, the additional time that might be required to use an iterative process is not necessary under these circumstances. See response to comment 1.1.</p> <p>Additionally, new permit findings are proposed that describe conditions under which permittees generally would be granted safe harbor, even if exceedance days occur, where the Regional Board determines that:</p> <p>(a) The source of the exceedance did not emanate from the MS4;                  (b) The MS4 discharge has been diverted to a sanitary sewer;                  (c) The MS4 discharge has been treated to a level that</p>	Yes	Permit Finding E.31

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1.5	The City of Arcadia believes that the introduction of the Santa Monica Beaches Bacteria TMDL in the Los Angeles County MS4 Permit exceeds the federal standard and, therefore, is subject to economic analysis.	<p>does not violate the single sample or geometric mean bacteria objectives; or</p> <p>(d) The permittees have demonstrated through a source investigation of the watershed pursuant to protocols established under Cal. Water Code 13178 that bacterial sources originating within the jurisdiction of the permittee have not caused or contributed to the exceedance of the Receiving Water Limitations.</p> <p>These safe harbor provisions would be consistent with the compliance monitoring provisions associated with the Santa Monica Bay Beaches Bacteria TMDLs, which are contained in Table 7-4.4 of the Basin Plan.</p> <p>The iterative process is to be used mainly to control pollutants in storm water discharges. The action deals with non-storm water discharges. For non-storm water discharges the Permittees had 15+ years to eliminate them or have them permitted under a traditional NPDES permit.</p> <p>Whatever the intent of paragraphs 2.1 through 2.4 may have been, the intent of paragraph 2.5 is to implement the summer dry weather TMDL which prohibits discharges that violate standards during relevant times of the year.</p> <p>The reopener will implement a federally mandated and approved TMDL into a federal NPDES permit, consistent with all federal requirements. Neither the LA/Burbank decision, nor any other authority requires an economic analysis under such circumstances. As noted in the LA/Burbank decision, NPDES permits must implement water quality standards irrespective of cost considerations. This action does not exceed the federal standard which is abundantly clear that the discharge of unauthorized non-storm water flows containing pollutants causing or contributing to violation of WQS or WQOs is prohibited.</p> <p>The California Environmental Quality Act expressly</p>		
1.6	The City also believes that the introduction of Santa Monica			

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3.1	likely to lead to administrative and possibly legal challenges.  The proposed reopener effectively, proposes the establishment of a numeric limit on the discharge of a pollutant which is contrary to U.S. Environmental Protection Agency (EPA) policy as it relates to municipal NPDES permits. The EPA has stated that municipal NPDES permits are to address pollutants including those subject total maximum daily loads (TMDLs), through the use of best management practices (BMPs) to be implemented on an iterative basis. Although the limitation is couched as a discharge prohibition and also, inexplicably. As a receiving water limitation, it still qualifies as a numeric limit because it includes waste load allocations (WLAs) for bacteria.	See response to comment 1.1		
3.2	The City has previously submitted comments regarding the requirement for municipalities to strictly comply with numeric water quality objectives, i.e., a TMDL's WLAs. These comments were submitted to, the County of Los Angeles, and copied to the Regional Board, by Ruitan & Tucker, LLP, on behalf of the City (please refer to Section C.1 ROWD Section 4.16 <i>Total Maximum Daily Load (TMDL) Implementation Plans</i> of the June 8, 2006 letter from Mr. Richard Montevideo entitled, <i>ROWD Submittal on Renewal of 2001 Municipal/NPDES Permit for Los Angeles County</i> ).	Both the <i>Defenders of Wildlife</i> decision and the <i>Rancho Cucamonga</i> decision affirm the Regional Board's authority to require strict compliance with water quality standards, including for discharges of storm water from MS4s. The unauthorized non-storm water discharges are subject to the prohibitions contained in Part 1 and 2.1.		
3.3	The Regional Board's inclusion of a numeric limit in the NPDES Permit preempts the State Water Resources Control Board's effort to establish a policy on numeric limits in municipal NPDES permits.	See response to comment 1.2		
3.4	The proposed new language for Part I.B, which address non-stormwater discharge prohibitions of the current Los Angeles County MS4 is written in a manner that applies the dry weather WLA for bacteria for Santa Monica Bay Beaches to all Los Angeles County MS4 Permittees (Municipal Permittees), as the following illustrates:  Discharge' of summer dry weather and, winter dry weather	See response to comment 1.3		



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11.1	Numerical Limits." Placing such proposed dry weather 5MB Bacteria TMDL language into the Discharge Prohibition and Receiving "Water Limitations sections of the MS4 Permit is likely to lead to administrative and possibly legal challenges.	The Regional Board acknowledges the actions taken to date by the County of Los Angeles to improve water quality and achieve water quality standards at SMB beaches.		
11.2	The County is committed to meeting water quality standards for bacteria at Santa Monica Bay beaches and throughout the County. Since adoption of the dry weather bacteria Total Maximum Daily Load (TMDL) in January 2004, the County has voluntarily taken the following actions.  INCLUSION OF NUMERIC LIMITS IN THE PERMIT DIRECTLY CONTRADICTS EPA GUIDANCE THAT STATES THAT TMDL LIMITS SHOULD BE INCLUDED IN STORM WATER PERMITS IN THE FORM OF BMPS AND MONITORING TO DETERMINE IF COMPLIANCE IS BEING ACHIEVED	See response to comment 1.1.		
11.3	REOPENING THE STORM WATER PERMIT AT THIS TIME IS UNNECESSARY AND PREMATURE	Reopening the permit at this time is wholly appropriate given that compliance with the summer dry weather provisions of the TMDL is required by July 15, 2006. All co-permittees under the LA County MS4 Permit have been on notice since 2001 that the staff report/ fact sheet of the current Los Angeles County MS4 permit anticipated the incorporation of TMDLs:  "TMDLs are one of the Regional 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, the Board does envision that storm water permits will be an important mechanism for implementing pollutant load reductions [in storm water discharges]." (p. 14.)		

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		<p>Additionally, the regulatory provisions of the TMDL state that the primary mechanism for implementing the TMDL's (dry and wet weather components) will be through the MS4 Permits (Basin Plan Table 7-4.1).</p> <p>This action deals with non-storm water discharges that cause or contribute to a violation of WQS or WQOs.</p> <p>Furthermore, incorporation of the TMDL provisions into the MS4 Permit is important at this time given the millions of visitors to Santa Monica Bay beaches at this -- the height of the beach season. The Regional Board obligated to protect the health of the millions of citizens that visit Santa Monica Bay beaches each summer. A recent study estimated that an annual excess of 627,800 to 1,479,200 cases of gastrointestinal illness occur as a result of swimming at Los Angeles and Orange County beaches contaminated with <i>enterococci</i> bacteria. Using a conservative health cost of gastroenteritis, this corresponds to an annual economic loss of \$21 million or \$50 million (in year 2000 dollars) depending upon the underlying epidemiological model used. (Given, S. and Pendleton, L. from the UCLA Department of Environmental Health Sciences, and Boehm, A. from the Stanford University Department of Civil and Environmental Engineering, Environmental Science and Technology - <i>in press</i>.)</p>		
11.4	Proposes to include numeric effluent limits in the Permit prior to issuance of the report of the Storm Water Panel of Experts, commissioned by the State Water Resources Control Board, on whether inclusion of such numeric limits in stormwater permits is feasible or appropriate.	See response to comment 1.2. Nothing in the record supports the claim that complying with the permit provisions that implement the dry weather TMDL would be infeasible or inappropriate. In fact many cities have already complied, and are in the process of complying with the provisions.		



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11.5	<p>It is inappropriate for the Regional Board to adopt numeric limits without first obtaining the guidance that will be obtained from this expert panel. There is no regulatory imperative to reopen the Permit before this expert panel issues its recommendation and no reason to do so.</p> <p>The Regional Board should not incorporate numeric bacteria limits into the Permit when the full spectrum of bacteria sources is not known and while the issue of whether fecal bacteria from nonpoint sources accurately indicates the presence of human pathogens is being examined.</p>	<p>See response to comment 11.3</p> <p>It is well documented that discharges from storm drains during dry and wet weather carry significant loads of bacteria to the shoreline in southern California. Noble et al. found that freshwater outlets, which included storm drains, failed to meet bacterial indicator standards in almost 60% of the samples, the worst of all of the strata evaluated in the regional shoreline monitoring program. Most of the standard failures near freshwater outlets were for multiple indicators and occurred repetitively throughout the five-week study period. (Noble, Rachel T., Dorsey, J., Leecaster, M., Mazur, M., McGee, C., Moore, D., Victoria, O., Reid, D., Schiff, K., Vainik, P., Weisberg, S. 1999. Southern California Bight 1998 Regional Monitoring Program, Vol I: Summer shoreline microbiology. Southern California Coastal Water Research Project, Westminster, CA.)</p> <p>It has also been documented that storm drains discharging to the shoreline of Santa Monica Bay contain human pathogens. Noble et al., cited above, showed through molecular tests the presence of human enteric virus genetic material in 7 of the 15 freshwater outlets, with 73% of these detections coinciding with levels of fecal coliforms that exceeded bacterial indicator thresholds.</p> <p>Furthermore, it was well documented in a landmark epidemiological study at Santa Monica Bay beaches -- the beaches covered by this amendment -- that there are</p>		

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		<p>significantly increased health risks from swimming and otherwise engaging in water recreation in the ocean in the vicinity of flowing storm drains (Haile, R.W., Alamillo, J., Barret, K., Cressey, R., Dermond, J., Ervin, C., Glasser, A., Harawa, N., Harmon, P., Harper, J., McGee, C., Millikan, R.C., Nides, M., Witte, J.S. 1996. An epidemiological study of possible adverse health effects of swimming in Santa Monica Bay, Santa Monica Bay Restoration Project; Haile, R.W., Witte, J.S., Gold, M., Cressey, R., McGee, C., Millikan, R.C., Glasser, A., Harawa, N., Ervin, C., Harmon, P., Harper, J., Dermond, J., Alamillo, J., Barret, K., Nides, M., Wang, G. 1999. The health effects of swimming in ocean water contaminated by storm drain runoff. Epidemiology 10(4):355-363.). While there may be unknowns regarding the myriad sources of bacteria within a watershed, in light of these scientific findings, it is imperative that the Regional Board not wait to regulate these discharges given that the health of millions of beachgoers is at stake.</p>		
11.6	<p>Reopening the Permit for one TMDL now, rather than addressing it during the Permit renewal process, is premature; will result in a piecemeal rather than coordinated approach to the TMDLs, and as noted above will deny the Regional Board the benefit of the report to be issued by the State Board's panel of experts.</p>	<p>These facts were already established by regulation when the TMDL was adopted. See responses to comments 1.2 and 11.3.</p>		
11.7	<p>The Regional Board and the permittees should develop a coordinated approach for incorporating into the Permit provisions to implement all the TMDLs that have been adopted to date. It should not be done on a piecemeal</p>	<p>See response to comment 11.3. While in some cases multiple TMDLs may be simultaneously incorporated into the permit, the implementation schedule articulated in the basin plan will also drive incorporation. In this instance, compliance with the dry weather limits is required by July</p>		

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11.8	<p>The Permit should not be reopened to address the Santa Monica Bay Beaches Bacteria TMDL because that TMDL has not yet been coordinated with the Malibu Creek Bacteria TMDL and the Ballona Creek Bacteria TMDL.</p>	<p>Implementation schedules for winter dry weather and wet weather are consistent among the three TMDLs. For summer dry weather, the Malibu Creek Bacteria TMDL requires compliance within 3 years, but allows an extension up to 6 years with Regional Board approval. The Ballona Creek Bacteria TMDL allows up to 6 years to comply with dry weather provisions during both summer and winter. The Santa Monica Bay Beaches TMDL requires compliance during summer dry weather within 3 years at compliance monitoring sites located at the outlets of Ballona Creek and Malibu Creek. Given the complexity and size of these subwatersheds, the Regional Board will consider the circumstances and the extent to which the permittees have endeavored to comply with the permit provisions when evaluating potential enforcement actions.</p> <p>See response to comment 11.8</p>		
11.9	<p>Compliance at the monitoring stations influenced by Malibu and Ballona Creeks should be consistent with implementation of those TMDLs. The proposed amendment, however, requires compliance two days after the proposed hearing. This is arbitrary and capricious. Certainly, numeric limits should not be incorporated into the Permit that are inconsistent with the Malibu Creek and Ballona Creek TMDLs.</p>	<p>See response to comment 1.2</p>		
11.10	<p>The Regional Board Will Have The Benefit of the Report from the State Board's Expert Panel By the Time The Regional Board Renews the Permit</p>	<p>The current permit provisions do not ensure no exceedance days of the bacteria objectives to protect</p>		
11.11	<p>There is No Need to Reopen the Permit Because the Permit</p>			



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11.12	<p>Already Has Sufficient Provisions to Assure Implementation of the TMDL</p> <p>The Permit's provisions must be supported by adequate findings. Water Code §§ 13263 and 13330; Code of Civil Procedure § 1094.5. The proposed amendment does not meet this requirement. To include the proposed numeric limitations in the Permit, the Regional Board must first make the following findings to support this amendment:</p> <ol style="list-style-type: none"> <li>1. A finding identifying the source of the bacteria that is causing the exceedance</li> <li>2. A finding that it is technically feasible to comply with the terms of this amendment</li> <li>3. A finding that the terms of the amendment can be met through cost effective programs that will be accepted by the public</li> <li>4. A finding that the amendment will not require the permittees to adopt controls or implement programs that go beyond the maximum extent practicable standard applicable to municipal storm water permits, 33 U.S.C. Section 1342(p)(3)(B)(iii) in order to comply with the amendment</li> <li>5. A finding that the terms of the amendment are reasonably achievable</li> <li>6. A finding that the Regional Board has considered all factors set forth in Water Code Section 13241</li> <li>7. A finding that the amendment is reasonable in light of the Water Code Section 13241 factors</li> </ol>	<p>REC-1 use in marine waters during summer dry weather. This action simply incorporates a WLA of an adopted TMDL that clarifies how the prohibition is to be complied with and enforced for dry weather non-storm water discharges containing bacteria.</p> <p>The permit provisions do contain adequate findings. Additional findings were also added following review of comments received, and a fact sheet will be prepared. The findings requested by the commenter are not necessary, and no authority is cited supporting the claim that such findings must be made. The source of the permit conditions is a previous regulation that specifically assigned waste load allocations, in the form specified, to the permittees here.</p> <p>1) No authority is cited for the proposition that the Regional Board must identify sources of bacteria that may cause exceedances before incorporating conditions in NPDES permits to require permittees to prevent the discharge of bacteria in amounts that violate standards. Nevertheless, a source analysis is already set forth in the TMDL regulation at Basin Plan Chapter 7-4.</p> <p>2) The feasibility of the terms of the amendment is not before the Regional Board at this time. The waste load allocations were already established in a prior regulation, and federal regulations require that they be incorporated into the relevant NPDES permits. Those regulations, however, were adopted in contemplation of the fact that they are technically feasible. Most jurisdictions indicated their intent to comply by diverting their dry weather discharges to sanitary sewers. Many diversions have already occurred.</p> <p>3) See response to comment 3.2. 4) See response to comment 3.2. 5) See response to comment 3.2. 6) See response to comment 1.5. 7) See response to comment 1.5.</p>	Yes	Permit Findings E.29 through E.34

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11.13	<p>The evidence identified to date is insufficient to support the proposed findings that the regional board is required to make. Public notice of the proposed amendment was issued to interested parties by letter dated May 18, 2006. That letter states that the file in support of this amendment is available online at the Regional Board's website. The website contains the following documents... The website contains or cites no evidence that supports this amendment. No staff report that summarizes the evidence to support this amendment is posted.</p>	<p>The permit contains discharge prohibitions language and receiving water limitations language that prohibit any discharges that cause or contribute to violation of WQS or WQOs. See Part 1 and 2.1.</p> <p>MEP standard is applicable only for discharges of storm water not to non-storm water discharges. The prohibition is applicable to non-storm water discharges.</p> <p>The evidence in the record does support the findings and the permit provisions. The "proposed findings" set forth in the County's comment letter are not supported by legal authority. The proposed findings are generally incorrect, and are not required to support an amendment to the permit to implement the federally approved TMDL that assigned the waste load allocations to these permittees. This permit modification specifically incorporates those waste load allocations, in the manner specified by the TMDL. The evidence supporting this action is set forth in response to comment 11.20. The commenter's reference to a staff report should actually be to a Fact Sheet, which is described in 40 CFR 124.8. A Fact Sheet will be prepared.</p>		
11.14	<p>Does this prohibition apply to all discharges under the Permit, prohibiting them from exceeding the waste loads identified in the TMDL, or only discharges to Santa Monica Bay?</p>	<p>The prohibition only applies to discharges to Santa Monica Bay beaches. The proposed language has been clarified to make this clear.</p>	Yes	Permit language, Part 1. B.
11.15	<p>Does this prohibition apply to flows at any location in the storm sewer system that discharges into Santa Monica Bay, or even broader, at any location in the Storm sewer system regardless of whether it discharges into Santa Monica Bay? The TMDL does not apply to flows at any location, but is based on exceedances at monitoring points.</p>	<p>The prohibition applies at the compliance monitoring sites identified in the <i>Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan</i> dated April 7, 2004. The permit language has been clarified to make this clear.</p>	Yes	Permit language, Part 2.5
11.16	<p>Proposed Change NO.4 continues this ambiguity. Although</p>	<p>The winter dry weather provisions have been removed from the proposed language given that the deadline for</p>	Yes	Permit language, Parts 1. B and 2.5

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11.17	Proposed Change NO.4 limits itself to discharges of bacteria into the Santa Monica Bay, its does not make clear whether its prohibition against winter dry-weather exceedances applies immediately or only after July 15, 2009, the date set forth in the TMDL.	The County presumes that the proposed amendment is intended to apply only to discharges from the MS4 to Santa Monica Bay. The County further presumes that the prohibition is meant to prohibit discharges from the MS4 that cause exceedances at the TMDL's monitoring points in excess of the allowable number, and that the prohibition does not apply to winter dry-weather discharges until July 15, 2009. The proposed language does not make this clear.	Yes	Permit language, Parts 1. B. and 2.5
11.18	<b>THE MONITORING POINTS IDENTIFIED ON PROPOSED ATTACHMENT V ARE INCONSISTENT WITH THE MONITORING POINTS DEVELOPED PURSUANT TO THE TMDL</b>	Attachment V has been deleted and, instead, the permit language references the compliance monitoring sites identified in the <i>Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan</i> dated April 7, 2004.	Yes	Permit language, Part 2.5 and Attachment V
11.19	By this letter, the County is notifying the Regional Board that it is not waiving its right to an adjudicatory hearing in accordance with all applicable statutory and regulatory provisions, including but not limited to Water Code Section 13263, Government Code Section 11400 et seq., Government Code Sections 11513, and 23 Code Cal. Reg. 648 et seq. The County intends to exercise its right to opening and closing statements, presentation of evidence, and examination and cross-examination of witnesses.	Government Code sections 11500 et seq. are not applicable to the Regional Board. Nevertheless the County will be authorized to present an opening and closing statement, relevant evidence, and the right to cross-examination of witnesses, subject to rules governing administrative hearings, and the appropriate discretion of the Board during the hearing.		
11.20	Because the evidence that the Regional Board staff intends to introduce at the hearing has not been identified, it is difficult to fully identify the witnesses that the County intends	All documents and exhibits that the Regional Board staff intends to rely upon in the Los Angeles Municipal Storm Water permit (NPDES Permit no: CAS004001)		



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	<p>to call at the hearing. Currently, the County requests that the following Regional Board staff person be present at the hearing to be called as witnesses by the County:</p> <p>(1) Jonathan Bishop, Executive Officer</p> <p>(2) Staff person most knowledgeable about the adoption of the Santa Monica Bay Beaches Bacteria TMDL.</p> <p>(4) Staff person most knowledgeable about the sources of bacteria being discharged into Santa Monica Bay and the causes of exceedances of the bacteria limits in Santa Monica Bay.</p> <p>Staff person most knowledgeable about the technology and other remedial measures that can be implemented to reduce bacteria discharges into the Santa Monica Bay.</p> <p>(5) Staff person most knowledgeable about staff efforts to meet with municipalities and responsible jurisdictions to determine efforts to comply with the Santa Monica Bay Beaches TMDL to date.</p> <p>(6) Staff person most knowledgeable about the municipalities' and responsible jurisdictions' efforts to comply with the Santa Monica Bay Beaches TMDL to date.</p>	<p>modifications on July 13, 2006 will be brought to the hearing. The relevant records supporting the proposed action include:</p> <ol style="list-style-type: none"> <li>1) Chapter 7-4 of the Basin Plan, which includes the regulatory provisions of the Santa Monica Bay Beaches Dry Weather TMDL;</li> <li>2) Regional Board Resolution #2002-004, which adopted the TMDL;</li> <li>3) State Water Board Resolution #2002-0149, which approved the TMDL;</li> <li>4) A Notice of Approval of Regulatory Action (File No. 02-1028-03 S) from the Office of Administrative Law dated December 9, 2002, which approved the TMDL;</li> <li>5) A letter from the United States Environmental Protection Agency, dated June 19, 2003, from Catherine Kuhlman, Director, Water Division, US EPA Region IX to Celestu Cantú, Executive Director, State Water Board approving the Santa Monica Bay Beaches Dry Weather TMDL;</li> <li>6) The Los Angeles County Municipal Separate Storm Sewer System Permit, Order # 01-182.</li> </ol> <p>These documents are posted online at: <a href="http://www.waterboards.ca.gov/losangeles/html/bpaRes/bpa.html">http://www.waterboards.ca.gov/losangeles/html/bpaRes/bpa.html</a> and <a href="http://www.waterboards.ca.gov/losangeles/html/programs/stormwater/lams4Documents.html">http://www.waterboards.ca.gov/losangeles/html/programs/stormwater/lams4Documents.html</a>.</p> <p>Additionally, the Regional Board staff intends to rely upon the testimony of witnesses, staff, parties, and interested persons that may be presented at the hearing, and all comment letters submitted in this matter. The Regional Board staff reserves the right to introduce other evidence in rebuttal of arguments or comments presented by anybody at the hearing.</p> <p>The following staff persons are the most knowledgeable</p>		

RESPONSE TO COMMENTS RECEIVED IN ADVANCE OF THE JULY 13, 2006 BOARD MEETING  
ON THE PROPOSED REOPENER OF  
THE COUNTY OF LOS ANGELES MUNICIPAL STORM WATER DISCHARGE PERMIT  
(NPDES PERMIT NO. CAS004001)  
AUGUST 4, 2006

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION	LOCATION IN DOCUMENTS
11.21	Because the evidence that the Regional Board staff intends to introduce at the hearing has not been identified, it is difficult to provide the Board with an estimate of the total amount of time this hearing might take. The County also has no estimate as to the time necessary for other parties' witnesses. The County currently estimates that it will need 8 to 16 hearing hours for its portion of the case, subject to modification once the Regional Board staff's evidence is identified.	about this matter and will be present at the hearing: Jonathan Bishop, Xavier Swamikannu, Carlos Urrunaga, Dan Radulescu, and Renee DeShazo. This response related to the hearing and record as generated in preparation for the Regional Board's consideration on July 13, 2006. Additional materials may be included in the record based upon what staff believes is appropriate after comments and proceedings subsequent to July 13, 2006 have been analyzed.		
11.22	The County requests that all documents and exhibits on which Regional Board staff intends to rely be identified and made available for inspection and copying prior to the hearing. The County further requests that all such documents be marked as exhibits and be present at the hearing for use at the hearing.	See response to comment 11.20. All documents and exhibits that the Regional Board staff intends to rely upon will be identified and brought to the hearing.		
11.23	For the above reasons, the Regional Board should defer consideration of the proposed amendment. Incorporation of provisions implementing the Santa Monica Bay Beaches Bacteria TMDL should be done at the time of the Permit's renewal and in coordination with the provisions relating to other TMDLs.	No compelling reason has been set forth to delay consideration of the proposed amendment. Awaiting the Permit's renewal would be inconsistent with the terms of the TMDL, which requires compliance by July 15, 2006.		
12.1	The Bureau of Sanitation of the City of Los Angeles (Bureau) appreciates the opportunity to comment on the	Comment noted.		



Item No. 12

RESPONSE TO COMMENTS SEPTEMBER 12, 2006

Reopening of the County of Los Angeles Municipal Separate  
Storm Sewer System Permit to include Summer Dry Weather  
Waste Load Allocations for Cities draining to Santa Monica Bay  
(Santa Monica Bay Beaches Bacteria TMDL)

County of Los Angeles Municipal Separate Storm Sewer System  
Permit  
(NPDES permit No. CAS004001)

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
 SECOND COMMENT PERIOD (July 21 – September 4, 2006)  
 (NPDES NO. CAS004001)

Table 1.A. Response to Comments on Approach to Include Dry Weather SMB Beaches Bacteria TMDL WLAs in the MS4 permit (for comments received at the July 21 workshop)

COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.A.1	<u>Storm Water Quality Management Program</u> Do not amend receiving water limitations to include the dry weather SMB Bacteria WLA. Utilize the iterative approach by requiring revisions to the Storm Water Quality Management Program	Azusa; Carson; Claremont; Executive Advisory Committee; Glendora; Inglewood; TECS Environmental (consultant for some municipalities); Whittier	Part 2 contains the Receiving Water Limitations, which is how the waste load allocations in the TMDL were expressed. So it is appropriate that they be placed there. Changes to the SQMP are geared toward managing the quality of storm water discharges through an iterative process. In contrast, non-storm water flows are to be prohibited under federal storm water regulations.	No	
1.A.2	<u>Await Permit Renewal</u> Utilize the normal MS4 permit renewal process to consider inclusion of SMB Bacteria WLAs	Malibu; Burhenn & Gest LLP (attorneys for LA County); County of Los Angeles; Redondo Beach	The reopener provisions in Pt 6.1. identify the authority and procedures for the Board to modify the permit prior to expiration. The proposed consideration by the Board to incorporate the Santa Monica Bay (SMB) Bacteria TMDL summer dry weather Waste Load Allocations (WLAs) complies with these provisions. The TMDL requires compliance with the summer dry weather waste load allocations by July 15, 2006.	No	
1.A.3	<u>Memoranda of Understanding</u> Consider the use of Memoranda of Understanding (MOUs)	Burhenn & Gest LLP (attorneys for LA County); Richard, Watson & Gershon (attorneys for Agoura Hills; Artesia;	40 CFR 122.44(d) requires that NPDES permits must be consistent with the assumptions and requirements of any available waste load allocation. Failing to	No	

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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.A.4	Prohibition Support amendment to permit Discharge Prohibitions and Receiving Water Limitations provisions, to prohibit the discharge of non storm water containing bacteria to Santa Monica Bay.	Heal the Bay; Natural Resources Defense Counsel (NRDC); Santa Monica Bay Keeper	The Water Board staff considered several options to render the SMB Beaches Bacteria TMDL summer dry weather WLAs enforceable, and determined that the limited reopener of the LA County MS4 permit was the best option to enforce the WLAs in a timely manner.	No	
	between the Water Board and municipal Permittees to implement WLAs	Beverly Hills; Hidden Hills; La Mirada; Norwalk; Rancho Palos Verdes; San Fernando; San Marino; South El Monte and West Lake Village)	incorporate the WLAs into the permit in favor of an MOU would be contrary to the federal regulations.		

Table 1.B. Response to Comments on Proposed Changes in the Second Version of Proposed Reopener (for comments rec'd during the period of July 21 to September 4)

COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.1	General The deadline to make Santa Monica Bay beaches safe for swimming has passed. Support incorporating the TMDL into the LA County MS4 Permit	Governor Schwarzenegger	Implementing TMDLs to improve water quality and protect public health is one of the Regional Board's highest priorities. Regional Board staff agrees that incorporation of the Santa Monica Bay Beaches Bacteria TMDL provisions into the MS4 Permit at this time is critical given the millions of visitors to Santa Monica Bay beaches at this -- the height of the beach season. The Regional Board is obligated to protect	No	



COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
 SECOND COMMENT PERIOD (July 21 – September 4, 2006)  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.2	The process of adoption lacked the opportunity for meaningful input resulting in significant deficiencies.	Redondo Beach	the health of the millions of citizens that visit Santa Monica Bay beaches each summer. A recent study estimated that an annual excess of 627,800 to 1,479,200 cases of gastrointestinal illness occur as a result of swimming at Los Angeles and Orange County beaches contaminated with <i>enterococci</i> bacteria. Using a conservative health cost of gastroenteritis, this corresponds to an annual economic loss of \$21 million or \$50 million (in year 2000 dollars) depending upon the underlying epidemiological model used. (Given, S. <i>et al.</i> 2006)  The Regional Board staff considered several options to render the SMB Beaches Bacteria TMDL summer dry weather WLAs enforceable, and determined that the limited reopener of the LA County MS4 permit was the best option to enforce the WLAs in a timely manner.  See response to 1.B.6 below.	No	
1.B.3	Object to the inclusion of numerical limits in an MS4 permit that is subject to the maximum extent practicable (MEP) standard	Redondo Beach	MS4 Permits are subject to both MEP and water quality standards. The reopener will implement a federally mandated and approved TMDL into a federal NPDES permit, consistent with all federal requirements.	No	
1.B.4	Express concern about	Bradbury, Carson,	Provisions in NPDES permits must	No	

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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.5	including a Waste Load Allocation (WLA) in the MS4 Permit, and establishing a precedent incorporating TMDLs into general storm water permits will lead to unwieldy and large permits that will be difficult to understand	Glendora, Inglewood, La Cañada Flintridge, Executive Advisory Committee	reflect the assumptions and requirements of available TMDLs (40 CFR 122.44 (d) (1) (vii) (B)), and the NPDES permit must incorporate the WLAs.  See response to 1.B.4 above	No	
1.B.6	Partnership – The best approach to achieving water quality objectives is a partnership between the Regional Board and responsible jurisdictions and agencies under the TMDL. Proposed motion is counterproductive to such partnership. Lack of adequate consultation between the Regional Board and responsible agencies.	County of Los Angeles Department of Public Works; Redondo Beach	The Regional Board and its staff are committed to working with stakeholders in a cooperative way. However, the Regional Board is obligated by federal regulation (40 CFR section 122.44(d)) to ensure that NPDES permits are consistent with the assumptions and requirements of any available waste load allocation. Failing to incorporate the waste load allocation into the permit would be contrary to the federal regulations.  Over the past seven years, since 1999, the Regional Board has forged a partnership with responsible jurisdictions and agencies under the SMB Beaches Bacteria TMDLs. The Regional Board and its staff have consulted extensively with responsible jurisdictions and agencies both at a technical level and a policy level on the Santa Monica Bay Beaches Bacteria TMDL for Dry Weather, which the	No	

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
			<p>proposed permit modifications directly implement. As documented below, the Regional Board has fully met the requirements of Water Code section 13240 to consult with and consider the recommendations of local agencies in adopting the SMB Beaches Bacteria TMDL as an amendment to the Los Angeles Region Basin Plan.</p> <p>During 1999 and 2000, Regional Board staff convened a technical steering committee facilitated by SCCWRP to provide input throughout the development of the TMDL. Additionally the Regional Board staff met with the Santa Monica Bay Restoration Commission's (SMBRC's) Technical Advisory Committee three times during 1999 - 2000 to solicit early technical input on data needs and approaches to developing the TMDL. During 2001, the year preceding the adoption of the TMDL, Regional Board staff held a total of 11 meetings with responsible jurisdictions and agencies and other stakeholder groups to solicit input on the development of the TMDL. These meetings included regular dialogue with the technical steering committee as well as multiple policy-level meetings with the Executive Advisory Committee and the SMBRC's Bay Watershed Council and Technical Advisory Committee. Representatives from the County of Los</p>		

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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
			<p>Angeles Department of Public Works were members of each of these committees and attended 8 of these meetings.</p> <p>During these meetings and in the regulatory language of the TMDL, the Regional Board made clear that the TMDL provisions would be primarily implemented through the MS4 Permit. Additionally, all Permittees under the LA County MS4 Permit have been on notice since 2001 that the Regional Board anticipated incorporating TMDLs into the MS4 permit. The staff report/fact sheet of the current Los Angeles County MS4 permit states:</p> <p>"TMDLs are one of the Regional 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, the Board does envision that storm water permits will be an important mechanism for implementing pollutant load reductions." (p. 14.)</p> <p>Additionally, after adoption of the Dry Weather TMDL, responsible jurisdictions and agencies formed a Technical Steering Committee to develop the Coordinated Shoreline</p>		



COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTS(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.7	Unnecessary - There is no demonstrated need to modify the permit at this time.	County of Los Angeles Department of Public Works	<p>Monitoring Plan (CSMP) required by the TMDL. The Regional Board participated actively in the TSC over several months to provide guidance and support in the development of the CSMP.</p> <p>The above description of Regional Board efforts to consult with and consider the recommendations of responsible jurisdictions and agencies demonstrates the Regional Board's commitment to forging a partnership with these agencies in the development and implementation of the TMDL to the extent possible given its regulatory obligations.</p> <p>Reopening the permit at this time is wholly appropriate given that compliance with the summer dry weather provisions of the TMDL is required by July 15, 2006. Awaiting the Permit's renewal would be inconsistent with these provisions.</p> <p>Furthermore, 40 CFR 122.44(d) requires that NPDES permits be consistent with the assumptions and requirements of any available waste load allocation. Failing to incorporate the waste load allocation into the permit would be contrary to the federal regulations.</p> <p>All Permittees under the LA County MS4 Permit have been on notice since</p>	No	



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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
			<p>2001 that Regional Board staff anticipated the incorporation of TMDLs into the MS4 permit:</p> <p>TMDLs are one of the Regional 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, the Board does envision that storm water permits will be an important mechanism for implementing pollutant load reductions. (p. 14.)</p> <p>The regulatory provisions of the TMDL also state that the primary mechanism for implementing the TMDL will be through the MS4 Permits (Basin Plan Table 7-4.1).</p> <p>From a public health standpoint, incorporation of the TMDL provisions into the MS4 Permit is important at this time given the millions of visitors to Santa Monica Bay beaches at this -- the height of the beach season. The Regional Board obligated to protect the health of the millions of citizens that visit Santa Monica Bay beaches each summer. A recent study estimated that an annual excess of 627,800 to 1,479,200 cases of gastrointestinal</p>		

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.8	Inconsistency with Malibu Creek and Ballona TMDLs - The summer dry weather compliance date for Malibu Creek is not until January 2009 and the summer dry weather compliance date for Ballona Creek is not until six years after the effective date, which will be sometime after 2012.	County of Los Angeles Department of Public Works	illness occur as a result of swimming at Los Angeles and Orange County beaches contaminated with <i>enterococci</i> bacteria. Using a conservative health cost of gastroenteritis, this corresponds to an annual economic loss of \$21 million or \$50 million (in year 2000 dollars) depending upon the underlying epidemiological model used. (Given, S. <i>et al.</i> 2006)  The proposed permit modifications specifically address direct discharges from the MS4 to Santa Monica Bay. MS4 discharges into Ballona Creek and Malibu Creek are subject to the compliance schedules set forth in the Ballona Creek Bacteria TMDL and Malibu Creek Bacteria TMDL, respectively. The regulatory provisions of these TMDLs will be incorporated into the MS4 Permit at a later date.	No	
1.B.9	Iterative Approach - Proposed Part 2.5 should be made a proposed Part 2.3 and compliance should be achieved through the iterative process.	County of Los Angeles Department of Public Works	The US EPA's Wet Weather TMDL Policy and State Board WQO 99-05 discuss the use of an iterative approach to controlling pollutants in storm water discharges. For non storm water discharges from MS4s that cause or contribute to exceedances of a water quality standard, the appropriate response is to prohibit the discharges or require strict compliance with the water quality standards.	No	

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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
			<p>The Regional Board is not suggesting that the sole reason for not employing an iterative approach is that likely means of compliance (i.e. dry weather diversions) do not require an iterative approach. The Regional Board further understands that not all dry weather discharges may be addressed through diversions.</p> <p>The key reasons for not employing an iterative approach to implement the SMB Beaches Bacteria Summer Dry Weather WLAs are:</p> <p>(1) The WLAs do not regulate the discharge of storm water;</p> <p>(2) The harm to the public from violating the WLAs is dramatic both in terms of health impacts to exposed beachgoers, and the economic cost to the region associated with related illnesses;</p> <p>(3) Despite the fact that more than a decade and a half has passed since MS4 permittees were required to eliminate illicit connections / discharges (IC/ID) into their MS4s, few permittees have adopted an aggressive approach to eliminating IC/IDs, and their measured approach has not eliminated standards violations at the beaches; and</p>		

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.10	The County Incorporates by Reference its Prior Comment Letters	County of Los Angeles Department of Public Works	(4) Few permittees have ever documented revisions to their SQMP to address chronic exceedances of water quality standards. See Response to Comments dated August 4, 2006, for comments received before the July 13, 2006 Board Meeting date.	See Response to Comments, dated August 4, 2006	
1.B.11	No lawful basis for making one Permittee responsible for another Permittee's compliance	County of Los Angeles Department of Public Works	The provision is derived directly from the TMDL, which was not challenged. The permittees are jointly responsible because they are discharging to and from a joint system. There are several safe harbors articulated in the fact sheet that would obviate liability by a particular jurisdiction. Moreover, nothing would prevent a permittee within a relevant subwatershed from seeking indemnity from another permittee in the same manner as joint tortfeasors, to the extent the permittee has not actually caused the violation.	No	
1.B.12	The County is notifying the Regional Board that it is not waiving its right to an adjudicatory hearing in accordance with all applicable statutory and regulatory provisions. The County intends to exercise its right to	County of Los Angeles Department of Public Works	An order of proceedings was issued on September 8, 2006, describing the process that will be employed. Each party to this quasi adjudicative proceeding will be afforded adequate due process of law, and will have a fair opportunity to present their case. The County's comments to date have not justified the need for eight hours to present its case. The times set forth in	N/A	



COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
 SECOND COMMENT PERIOD (July 21 – September 4, 2006)  
 (NPDES NO. CA5004001)

COMMENT NO.	SUMMARY OF COMMENT	COMMENTS(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.13	<p>opening and closing statements, presentation of evidence, and examination of witnesses. The County anticipates needing at least eight hours or more to present its case.</p> <p>The evidence that the Regional Board staff intends to introduce at the hearing has not been identified. All documents and exhibits relied upon should be made available for inspection and copying prior to the hearing</p>	<p>County of Los Angeles Department of Public Works</p>	<p>The Order of Proceedings are subject to modification for cause in the Chair's discretion.</p> <p>The evidence, documents, and the exhibits have been identified and posted on the Water Board's website at,                      1. Public Notices:  <a href="http://www.waterboards.ca.gov/losangeles/html/meetings/public_notices.html">http://www.waterboards.ca.gov/losangeles/html/meetings/public_notices.html</a>                      2. Storm Water - Los Angeles Municipal Permits:  <a href="http://www.waterboards.ca.gov/losangeles/html/programs/stormwater/lams4.html">http://www.waterboards.ca.gov/losangeles/html/programs/stormwater/lams4.html</a>                      3. Current Board Meeting Items page:  <a href="http://www.waterboards.ca.gov/losangeles/html/current_agenda_items.html">http://www.waterboards.ca.gov/losangeles/html/current_agenda_items.html</a></p>	N/A	
1.B.14	<p>The County requests that the Executive Officer and knowledgeable persons about the matter be present at the hearing to be called as witnesses by the County.</p>	<p>County of Los Angeles Department of Public Works</p>	<p>and are available for copying                      The following knowledgeable persons about this matter will be present at the hearing: Jonathan Bishop, Xavier Swamikannu, and Renee DeShazo.</p>	N/A	

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.15	Receiving Water Limitation Language The proposed language is ambiguous. Recommend inserting the word 'non storm water' in Part 1.B and Part 2.5.	County of Los Angeles Department of Public Works	The current wording in Part 1.B and Part 2.5, which refers to "summer dry weather" is consistent with the regulatory language of the TMDL. The term "summer dry weather" is clearly defined in the TMDL and in Part 5. Definitions of the Permit. It would be redundant to insert the word "non-stormwater".	No	
1.B.16	New Findings 33 and 34 unnecessarily limit Water Board authority to enforce the bacteria discharge prohibition. In addition, these Findings outline 3 conditions under which Permittees would not be responsible for violations	NRDC; Santa Monica Bay Keeper; Heal the Bay	These findings do not limit the Board's authority to enforce the bacteria discharge prohibition; it merely states Regional Board staffs' approach in investigating and properly identifying and following up, as appropriate, with responsible agencies. Findings 33 and 34 have been clarified to address the concerns regarding ineffective diversions of dry-weather flows and inadequate source investigations.	yes	Findings 33 and 34
1.B.17	Concur with revisions that now clarify that Permittees are not responsible for bacteria exceedances under certain enumerated conditions identified in Findings 32 and 33.	County of Los Angeles Department of Public Works	See Response to 1.B.16	yes	
1.B.18	The Proposed Findings Are Not Sufficient to Support the Proposed Amendment	County of Los Angeles Department of Public Works	The findings proposed by the commenter are not necessary to reopen a permit to implement a waste load allocation. 1. While a source analysis might be useful for an enforcement	No	

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.19	The CSMP divided the monitoring sites into two divisions: sites that are influenced by MS4s,	Redondo Beach	<p>order, no authority requires the source of bacteria to be identified before a WLA is incorporated into the permit. In any event, the source analysis occurred when the TMDL was adopted, and the TMDL is not now subject to collateral attack. 2. No evidence of technical infeasibility has been shown. The TMDL describes foreseeable means of compliance. 3. No authority supports the claim that public acceptance is a precondition to a permit condition. 4. Every appellate decision in California affirms the Water Boards' right to require measures beyond MEP, and no finding is required in that regard. Findings show that the targeted discharges are not storm flows in any event. 5. No evidence has been submitted showing that the permit conditions are not reasonably achievable. No authority supports the commenter's claim that such a finding is necessary. 6. and 7. Non-storm water flows are not subject to the MEP standard. No evidence has been submitted showing the conditions are not practicable. In any event, the permit conditions are fully compliant and within federal law requirements and therefore the Burbank decision does not apply. It is not necessary to limit the reference in the Findings to "Point Zero" sites, since the language in the Order clearly indicates that what is being regulated</p>	No	



COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.20	The proposed new language in Finding 33(b) unduly limits the methods for diverting dry weather flow to sanitary sewers. Other types of diversions could be just as effective. The language should more generally cover situations where the MS4 does not discharge dry weather flow to Santa Monica Bay.	Redondo Beach	are MS4 discharges to Santa Monica Bay. The Regional Board in any investigative order would determine whether the site is impacted by a MS4 discharge. Enforcement orders would only be issued to permittees under the MS4 Permit if the Regional Board determined that the source of noncompliance was a MS4 discharge. If not, separate investigative orders, WDRs or enforcement orders may be issued to the other responsible jurisdiction(s) or agencies identified in Basin Plan Table 7-4.1 footnote 3.	Yes	Finding 33(b)
1.B.21	The proposed language in Finding 33(c) should be more specific so that it is clear that the new language only applies to flows during summer dry weather.	Redondo Beach	Regional Board staff agrees with the commenter and has made the suggested change.	Yes	Finding 33(c)
1.B.22	The proposed language	Redondo Beach	Regional Board staff agrees with the	Yes	Part 1.B, Footnote 3

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
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COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.23	<p>In Footnote 3, Part 1.B. would be more easily understood if the specific portions of Table 7-4.1 were included.</p> <p>The term "wave wash" in Part 2.5 should be removed as the adjacent footnote links the word to the CSMP. This is misleading. The term should also be removed from Part V. Definitions.</p>	Redondo Beach	<p>commenter and has made the suggested change.</p> <p>Footnote 4 has been moved to the end of Part 2.5 to avoid directly linking the term "wave wash" to the CSMP. However, it is important to retain the term "wave wash", since the wave wash is the compliance point identified in the TMDL for "Point Zero" sites. The definition of "Wave Wash" in Part V. Definitions of the proposed language is the same as the definition provided in the TMDL.</p>	Yes	Part 2.5, Footnote 4 moved to end of section
1.B.24	The proposed new definitions in Part V. for "Dry Weather" and "Rain Day" are confusing and do not exactly match the TMDL definition. Suggest adding definition of "Wet Weather" and defining dry weather as those days not defined as wet weather.	Redondo Beach	The definition of "Dry Weather" in Part 5. Definitions has been corrected.	Yes	Part 5. Definitions of Order language
1.B.25	Proposed Finding 32 is an important element of adding the SMB Beaches Bacteria TMDL into the NPDES permit. It should be integrated into the Permit Monitoring and Reporting Program.	Redondo Beach	It is Regional Board staff's intent to incorporate the CSMP into the Permit Monitoring and Reporting Program at the time of Permit renewal.	No	

COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES MUNICIPAL STORMWATER DISCHARGE PERMIT  
 SECOND COMMENT PERIOD (July 21 – September 4, 2006)  
 (NPDES NO. CAS004001)

COMMENT NO.	SUMMARY OF COMMENT	COMMENTER(S)	RESPONSE	REVISION	LOCATION IN DOCUMENTS
1.B.26	The introduction of the CSMP into the MS4 Permit could lead to confusion due to the existence of the "Shoreline Monitoring", Section II D portion of the existing permit. There should be a clear separation between these two programs to ensure that the data collected by the permit "Shoreline Monitoring" program is not misused.	Redondo Beach	The CSMP will eventually replace the existing "Shoreline Monitoring" Section II D portion of the existing permit. At present, the sites identified in the "Shoreline Monitoring" section are a subset of the compliance monitoring sites identified in the CSMP. The data from the two programs are nearly equivalent with the exception of sampling frequency and both are intended to be used to assess compliance with water quality standards at Santa Monica Bay beaches.	No	
1.B.27	The additional findings delineated in paragraphs E 33 and 34 should be integrated into the Order under Part 6. P. or at the end of Part 2	Redondo Beach	Regional Board staff continue to believe that this language needs to reside in the findings of the permit. This language clearly states Regional Board staffs' general approach in investigating and properly identifying and following up, as appropriate, with responsible agencies; however, including this language in the order may inappropriately restrict the authority and discretion of Board staff or the Regional Board in exercising future enforcement for specific circumstances yet to occur.	No	



# California Regional Water Quality Control Board Los Angeles Region



Linda S. Adams  
Deputy Secretary

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

Arnold Schwarzenegger  
Governor

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## Notice of Public Meeting/Hearing

Thursday, August 9, 2007

9:00 a.m.

Meeting Location:

Metropolitan Water District of  
Southern California  
(Board Room)  
700 North Alameda Street  
Los Angeles, California

## Agenda

The Regional Board strives to conduct an accessible, orderly, and fair meeting. During the meeting, the Chair will conduct the meeting and establish appropriate rules and time limitations for each item. The Board will only act on items designated as action items. Action items on the agenda are staff proposals, and may be modified by the Board as a result of public comment or Board member input. Additional information about Regional Board meeting procedures is included after the last agenda item.

To ensure a fair hearing and that the Regional Board Members have an opportunity to fully study and consider written material, unless stated otherwise, written materials must be provided to the Executive Officer *not later than 5:00 p.m. on July 30, 2007. Please consult the agenda description for specific items, because certain items may have an earlier deadline for written submissions. If you are considering submitting written materials, please consult the notes at the end of the agenda. Failure to follow the required procedures may result in your materials being excluded from the hearing record; however, failure to timely submit written materials does not preclude a person from testifying before the Board.*

### INTRODUCTORY ITEMS

1. **Roll Call.**
2. **Order of Agenda.** The agenda items are numbered for identification purposes only and may not necessarily be considered in this order.
3. **Approval of June 7, 2007 Draft Meeting Minutes.**  
[Ronji Harris, (213) 576-6612]
4. **Board Member Communications.**
  - 4.a. Ex Parte Disclosure. Board Members will identify any discussions they may have had requiring disclosure pursuant to Government Code section 11430.40.



- 4.b. Board Member Reports. The Board Members may discuss communications, correspondence, or other items of general interest relating to matters within the Board's jurisdiction.
- 5.a. **Executive Officer's Report.**  
[Deborah Smith, (213) 576-6609]
- 5.b. **Board Checklist.**
- 5.c. **Update from State Board.**
6. **Public Forum.** Any person may address the Board regarding any matter within the Board's jurisdiction that does not appear elsewhere on this agenda. Remarks will be limited to five (5) minutes, unless otherwise directed by the Chair. Items marked with an asterisk are expected to be routine and noncontroversial. The Board will be asked to approve these items at one time without discussion. Any person may request that an item be removed from the uncontested calendar. The Chair will determine the appropriate time to consider an item removed from the consent calendar.

### **UNCONTESTED ITEMS**

#### **Waste Discharge Requirements that Serve as Individual NPDES Permits**

##### **Time Schedule Order-**

- \*7. Consideration of a proposed Time Schedule Order for Al Larson Boat Shop; NPDES No. CA0061051. (Comment submittal deadline was June 22, 2007) [Cassandra Owens, (213) 576-6750]
- \*8. Consideration of a proposed Time Schedule Order for Simi Valley Water Quality Control Plant NPDES No. CA0055221 (The comment submittal deadline was July 16, 2007) [Blythe Ponek-Bacharowski, (213) 576-6720]
- Renewal-**
- \*9. Ultramar, Inc. (Wilmington Marine Terminal, Berth 164), Wilmington; NPDES No. CA0055719 (Comment submittal deadline was July 19, 2007) [Rosario Aston, (213) 576-6653]

#### **Non-NPDES State Discharge Requirements**

##### **New-**

- \*10. Consideration of a tentative Resolution approving a California Environmental Quality Act (CEQA) Environmental Checklist and adopting a Mitigated Negative Declaration and Waste Discharge Requirements for the Boeing Realty Corporation for remediation of volatile organic compounds (VOCs) in groundwater at the former C-6 Facility in Los Angeles (File No. 95-036) (Comment submittal deadline was June 11, 2007.) [Ana Townsend, (213) 576-6738]
- 10.1 Waste Discharge Requirements  
10.2 Mitigated Negative Declaration
- Revision-**
- \*11. Consideration of revised Waste Discharge Requirements for The Thacher School for discharge of domestic wastewater from an upgraded wastewater treatment plant. (File No. 93-16) (Comment submittal deadline was June 25, 2007) [Dionisia Rodriguez, (213) 620-6122]

### **ACTION ITEMS**

#### **Waste Discharge Requirements/NPDES Permit Reopener-**

12. County of Los Angeles Municipal Separate Storm Sewer System Permit; NPDES No. CAS004001, to consider incorporation of the summer dry weather wasteload allocations from the Marina Del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL for Mothers' Beach (Also known as Marina Beach). (Comment submittal deadline was June 25, 2007) [Rebecca Christmann, (213) 576-6757 and Carlos Urrunaga, (213) 620-2083]

**BASIN PLANNING/TMDL**

13. Consideration of a proposed Basin Plan Amendment to incorporate a Total Maximum Daily Load for trash in the Los Angeles River Watershed. (Comment submittal deadline was May 4, 2007) [Ginachi Amah, (213) 576-6685]

**CLOSED SESSION**

14. As authorized by the Government Code section 11126, the Regional Board will be meeting in closed session. Closed session items are not open to the public. Items the Board may discuss include the following: [Michael Levy, (MJL), (916) 341-5193; Jennifer L. Fordyce (JLF) (916) 324-6682.]
- 14.1 *Cities of Los Angeles, City of Burbank v. Los Angeles Regional Water Quality Control Board*, Los Angeles County Superior Court, Case Nos. BS 060957 and BS 060960. [Challenging the Burbank, Tillman, and Los Angeles-Glendale Water Reclamation Plants' NPDES permits]. (MJL)
- 14.2 *Cities of Arcadia, et al., v. Los Angeles Regional Water Quality Control Board et al.*, San Diego Superior Court No. GIC 803631 [Challenging the Los Angeles River Trash TMDL]. (MJL)
- 14.3 *County of Los Angeles et al. v. Commission on State Mandates et al. and City of Artesia et al. v. State of California*, Los Angeles Superior Court Nos. BS 089769 & BS089785, Second District Court of Appeal No. B183981 [Alleging that the Los Angeles MS4 Permit created an unfunded state mandate]. (MJL)
- 14.4 *Boeing v. Los Angeles Regional Water Quality Control Board et al., Los Angeles County Superior Court No. BS106941* [Challenge to permit for the Santa Susana Field Laboratory]. (MJL)
- 14.5 *In re Halaco Engineering Company*, United States Bankruptcy Court, Central District of California, Northern Division, No. ND-02-12255 RR; [Regarding a CDO and CAO at the Oxnard Property]. (JLF)
- 14.6 *Cities of Arcadia et al., v. Los Angeles Regional Water Quality Control Board*, Orange County Superior Court No. 06CC02974 [Challenging the 2004 Triennial Review]. (MJL)
- 14.7 *Cities of Bellflower et al., v. Los Angeles Regional Water Quality Control Board et al.*, Los Angeles Superior Court No BS101732 [Challenging the Los Angeles River and Ballona Creek Metals TMDLs]. (MJL)
- 14.8 *People of the State of California Regional Water Quality Control Board, Los Angeles Region v. City of Santa Paula, Santa Paula Water Reclamation Facility, Ventura County Superior Court.* (JLF)
- 14.9 Consultation with counsel about:
- (a) A judicial or administrative adjudicatory proceeding that has been formally initiated to which the Regional Board is a party;
  - (b) A matter that, based on existing facts and circumstances, presents significant exposure to litigation against the Regional Board;
  - (c) A matter which, based on existing facts and circumstances, the Regional Board is deciding whether to initiate litigation. (JLF)
- 14.10 Consideration of the appointment, employment, evaluation of performance, or dismissal of or complaints about a public employee. (MJL)
15. • **Adjournment of Current Meeting.** The next regular meeting is scheduled for September 6, 2007, at the Metropolitan Water District of Southern California, Board Room, 700 North Alameda Street, Los Angeles, CA.

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**NOTICE**

*Additional information concerning hearing procedures, written submissions, and the record.*

**Hearing Procedures:** The Regional Board follows procedures established by the State Water Resources Control Board. These procedures are established in regulations commencing with section 647 of title 23 of the California Code of Regulations. The Chair may establish specific procedures for each item, and consistent with section 648, subdivision (d) of title 23 of the California Code of Regulations may waive

nonstatutory provisions of the regulations. Generally, all witnesses testifying before the Regional Board must affirm the truth of their testimony and are subject to questioning by the Board Members. The Board does not, generally, require the designation of parties, the prior identification of witnesses, or the cross examination of witnesses. Any requests for an alternate hearing process should be made to the Executive Officer in advance of the meeting, and under no circumstances later than 5:00 p.m. on the Thursday preceding the Board meeting.

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**Written Submissions:** Written materials (whether hand-delivered, mailed, e-mailed, or facsimiled) **must be received prior to the relevant deadline** established in the agenda and public notice for an item. If the submitted material is more than 10 pages or contains foldouts, color graphics, maps, or similar items, 12 copies must be submitted prior to the relevant deadline.

Failure to comply with requirements for written submissions is grounds for the Chair to refuse to admit the proposed written comment or exhibit into evidence. (Cal. Code Regs. tit. 23, § 648.4(e).) The Chair may refuse to admit written testimony into evidence unless the proponent can demonstrate why he or she was unable to submit the material on time or that compliance with the deadline would otherwise create a hardship. If any other party demonstrates prejudice resulting from admission of the written testimony, the Chair may refuse to admit it.

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**Administrative Record:** Material presented to the Board as part of testimony that is to be made part of the record must be left with the Board. This includes photographs, slides, charts, diagrams, etc. All Board files pertaining to the items on this Agenda are hereby made a part of the record submitted to the Regional Board by staff for its consideration prior to action on the related items.

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**Accessibility:** Individuals requiring special accommodations or language needs should contact Dolores Renick at (213) 576-6629 or [drenick@waterboards.ca.gov](mailto:drenick@waterboards.ca.gov) at least ten working days prior to the meeting. TTY/TDD/Speech -to-Speech users may dial 7-1-1 for the California Relay Service.

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**Availability of Complete Agenda Package:** A copy of the complete agenda package is available for examination at the Regional Board Office during regular working hours (8:00 a.m. to 5:00 p.m. Monday through Friday) beginning 10 days before the Board meeting. Questions about specific items on the agenda should be directed to the staff person whose name is listed with the item.

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**Continuance of Items:** The Board will endeavor to consider all matters listed on this agenda. However, time may not allow the Board to hear all matters listed. Matters not heard at this meeting may be carried over to the next Board meeting or to a future Board meeting. Parties will be notified in writing of the rescheduling of their item. Please contact the Regional Board staff to find out about rescheduled items.

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**Challenging Regional Board Actions:** Pursuant to Water Code section 13320, any aggrieved person may file a petition to seek review by the State Water Resources Control Board of most actions taken by the Regional Board. A petition must be filed within 30 days of the action. Petitions must be sent to State Water Resources Control Board, Office of Chief Counsel; ATTN: Elizabeth Miller Jennings, Senior Staff Counsel; 1001 "I" Street, 22nd Floor; Sacramento, CA 95814.

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**Electronic Information and Updates:** Our web site address is [www.waterboards.ca.gov/rwqcb4](http://www.waterboards.ca.gov/rwqcb4). The site can also be accessed through the State Water Resources Control Board's web site at [www.waterboards.gov/losangeles/](http://www.waterboards.gov/losangeles/), then clicking on "Regional Boards". Information available online includes the Regional Board's meeting schedule, a list of the Regional Board members, past and present Executive Officer reports, program information, a list of staff and phone numbers arranged by their work unit, and links to the Santa Monica Bay Restoration Commission's home page and other governmental agencies. Last-minute changes to the agenda, such as the continuance of an item, will be posted electronically. If you need further information, please contact Jack Price at (213) 576-6669.

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**Pending Water Quality Certifications:** A listing of pending water quality certification applications currently on public notice pursuant to Section 401 of the Federal Clean Water Act may be obtained by calling Valerie Carrillo at (213) 576-6759.



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**Settlement of Enforcement Actions:** A listing of settlement enforcement actions can be accessed by the following link: <http://www.waterboards.ca.gov/losangeles/html/programs/enforcement/acl.html>

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**From:** Lyris <lyris@swrcb8.swrcb.ca.gov>  
**To:** <RHARRIS@rb4.swrcb.ca.gov>  
**Date:** 8/12/03 1:40PM  
**Subject:** Re: your 'review' command

Here is the information you requested:

Name: reg4\_short\_form\_agenda  
Topic: region 4 meetings  
Short-description: Board Meeting Short Form Agenda  
Language-1: English  
Language-2: English  
Home-page: news://swrcb8.swrcb.ca.gov/reg4\_short\_form\_agenda  
Keywords: Board Meeting Short Form Agenda  
Security: open  
Visitors: yes  
Global: yes  
Archives: yes  
Archive-seaching: yes  
Newsgroup: yes  
Newsgroup-URL: news://swrcb8.swrcb.ca.gov/reg4\_short\_form\_agenda

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Lyris Member ID: 18847  
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Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18905

---  
Email Address: bkelly@ci.arcadia.ca.us  
Name: City of Arcadia  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18858

---  
Email Address: blancartes@ci.irwindale.ca.us  
Name: City of Irwindale  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18924

---  
Email Address: blee@oit.swrcb.ca.gov  
Name: Bee  
Type: normal  
Subscription type: mail  
Date joined: October 02, 2000  
Lyris Member ID: 7146

---  
Email Address: bmalkenhorst@ci.vernon.ca.us  
Name: City of Vernon  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002  
Lyris Member ID: 19012

---  
Email Address: bmichaelis@ci.san-dimas.ca.us  
Name: City of San Dimas  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18978

---  
Email Address: bradmilner@kennedyjenks.com  
Name: Brad Milner  
Type: normal  
Subscription type: mail  
Date joined: March 11, 2002  
Lyris Member ID: 17411

---  
Email Address: bteaford@ci.burbank.ca.us  
Name: Bonnie Teaford  
Type: normal  
Subscription type: mail  
Date joined: November 22, 2002  
Lyris Member ID: 20266

---  
Email Address: BTerry@webtv.net  
Name: William L Terry  
Type: normal  
Subscription type: mail  
Date joined: February 19, 2002  
Lyris Member ID: 17200

---  
Email Address: btoone@cityofpalmdale.org  
Name: City of Palmdale  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18964

---  
Email Address: bvlach@ciwmb.ca.gov  
Name: Bernard R. Vlach  
Type: normal  
Subscription type: mail  
Date joined: December 21, 2000  
Lyris Member ID: 9848

---  
Email Address: caelliott@aol.com  
Name: Carol Elliott  
Type: normal  
Subscription type: mail  
Date joined: February 25, 2002  
Lyris Member ID: 17247

---  
Email Address: cal.parrish@oes.ca.gov  
Name: Cal Parrish  
Type: normal  
Subscription type: mail

Date joined: June 03, 2002  
Lyris Member ID: 18401

---  
Email Address: cardoza\_angel@yahoo.com  
Name: Angel Cardoza Jr.  
Type: normal  
Subscription type: mail  
Date joined: January 11, 2001  
Lyris Member ID: 10209

---  
Email Address: catherinedvoss@aol.com  
Name: Catherine Voss  
Type: normal  
Subscription type: mail  
Date joined: April 25, 2002  
Lyris Member ID: 18064

---  
Email Address: cgy@san.lacity.org  
Name: Clayton Yoshida  
Type: normal  
Subscription type: mail  
Date joined: January 31, 2003  
Lyris Member ID: 20936

---  
Email Address: chauk@bp.com  
Name: Kiran Chaudhari  
Type: normal  
Subscription type: mail  
Date joined: April 19, 2002  
Lyris Member ID: 17984

---  
Email Address: cheryl.collart@mail.co.ventura.ca.us  
Name: Cheryl Collart  
Type: normal  
Subscription type: mail  
Date joined: April 18, 2003  
Lyris Member ID: 22113

---  
Email Address: chris@hydrologue.com  
Name: Chris D'sa  
Type: normal  
Subscription type: mail  
Date joined: June 04, 2002  
Lyris Member ID: 18416

---  
Email Address: christy@usgvmwd.org  
Name: Christine Hawkins  
Type: normal  
Subscription type: mail  
Date joined: March 19, 2002  
Lyris Member ID: 17592

---  
Email Address: City of Lakewood,,,,sburkholder@lakewood.org,City  
Name: City of Lakewood  
Type: normal  
Subscription type: mail

Date joined: July 22, 2002  
Lyris Member ID: 18930

---

Email Address: City of Vernon,,,,bmalkenhorst@ci.vernon.ca.us, City  
Name: City of Vernon  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19010

---

Email Address: city-manager@santafesprings.org  
Name: City of Santa Fe Springs  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18983

---

Email Address: City@accessduarte.com  
Name: City of Duarte  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18906

---

Email Address: city@ci.temple-city.ca.us  
Name: City of Temple City  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19004

---

Email Address: cityclerk@ci.signal-hill.ca.us  
Name: City of Signal Hill  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18991

---

Email Address: cityclerk@earthlink.net  
Name: City of Hawthorne  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18916

---

Email Address: cityhall@ci.monrovia.ca.us  
Name: City of Monrovia  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18955

---

Email Address: cityhall@cityofbradbury.org  
Name: City of Bradbury  
Type: normal  
Subscription type: mail

Date joined: July 22, 2002  
Lyris Member ID: 18891

---

Email Address: citymanager@ci.el-monte.ca.us  
Name: City of El Monte  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18907

---

Email Address: Citymanager@hiddenhillscity.org  
Name: City of Hidden Hills  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18919

---

Email Address: citymanager@rpv.com  
Name: City of Rancho Palos Verdes  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18970

---

Email Address: citymanager@santa-monica.org  
Name: City of Santa Monica  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18984

---

Email Address: Citymanager@toaks.org  
Name: City of Thousand Oaks  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19005

---

Email Address: citymgr@ci.burbank.ca.us  
Name: City of Burbank  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18892

---

Email Address: cityofbg1@earthlink.net  
Name: City of Bell Gardens  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18887

---

Email Address: cityofrh@aol.com  
Name: City of Rolling Hills  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002  
Lyris Member ID: 18973

---  
Email Address: city\_council@ci.glendora.ca.us  
Name: Glendora City Council  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19044

---  
Email Address: cjeffers@montereypark.ca.gov  
Name: City of Monterey Park  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18957

---  
Email Address: ckurtz@ci.pasadena.ca.us  
Name: City of Pasadena  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18967

---  
Email Address: clau@planning.co.la.ca.us  
Name: Clement Lau Aicp  
Type: normal  
Subscription type: mail  
Date joined: July 31, 2003  
Lyris Member ID: 24384

---  
Email Address: clawrence@ensr.com  
Name: Charles J. Lawrence Jr.  
Type: normal  
Subscription type: mail  
Date joined: May 14, 2002  
Lyris Member ID: 18242

---  
Email Address: CLBarnett@insituform.com  
Name: Dr. C. Lance Barnett  
Type: normal  
Subscription type: mail  
Date joined: January 28, 2001  
Lyris Member ID: 11004

---  
Email Address: clerk@cityofmaywood.com  
Name: City of Maywood  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18954

---  
Email Address: CLOUROS@TRAMMELLCROW.COM  
Name: Chris Louros  
Type: normal  
Subscription type: mail



Date joined: November 22, 2002  
Lyris Member ID: 20256

---  
Email Address: cmeyer@rcnchicago.com  
Name: Carlyn A. Meyer  
Type: normal  
Subscription type: mail  
Date joined: January 07, 2003  
Lyris Member ID: 20624

---  
Email Address: cmorris@ci.san-dimas.ca.us  
Name: City of San Dimas  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18977

---  
Email Address: cmrtay@wlv.org  
Name: City of Westlake Village  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19017

---  
Email Address: cnclmanfox@aol.com  
Name: Andrew Fox  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18850

---  
Email Address: colcm@qnet.com  
Name: City of Lancaster  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18931

---  
Email Address: COMLESD@BP.COM  
Name: Stephen Comley  
Type: normal  
Subscription type: mail  
Date joined: November 22, 2002  
Lyris Member ID: 20259

---  
Email Address: Council@ci.ventura.ca.us  
Name: City of Ventura  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19008

---  
Email Address: cpederson@coastal.ca.gov  
Name: Christopher Pederson  
Type: normal  
Subscription type: mail



Date joined: September 01, 2000  
Lyris Member ID: 6572

---

Email Address: ctiy\_mgradm@earthlink.net  
Name: City of Hawthorne  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18917

---

Email Address: cudahy@pacbell.net  
Name: City of Cudahy  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18902

---

Email Address: cvasquez@ci.bell-gardens.ca.us  
Name: City of Bell Gardens  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18886

---

Email Address: dadams@ci.agoura-hills.ca.us  
Name: City of Agoura Hills  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18856

---

Email Address: dandelcampo@earthlink.net  
Name: Daniel Del Campo  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19020

---

Email Address: daniel.wall@cmbia.keithco.com  
Name: Daniel S. Wall  
Type: normal  
Subscription type: mail  
Date joined: November 26, 2001  
Lyris Member ID: 15587

---

Email Address: DavidJLennon@aol.com  
Name: David Lennon  
Type: normal  
Subscription type: mail  
Date joined: October 20, 2000  
Lyris Member ID: 8220

---

Email Address: dbell@ci.san-marino.ca.us  
Name: City of San Marino  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002  
Lyris Member ID: 18981

---  
Email Address: dblankenhorn@entrix.com  
Name: David Blankenhorn  
Type: normal  
Subscription type: mail  
Date joined: July 03, 2002  
Lyris Member ID: 18680

---  
Email Address: dcourtemarche@pico-rivera.org  
Name: City of Pico Rivera  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18968

---  
Email Address: dduckworth@ci.calabasas.ca.us  
Name: City of Calabasas  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18893

---  
Email Address: dekermenjianh@cdm.com  
Name: Hampik Dekermenjian  
Type: normal  
Subscription type: mail  
Date joined: November 22, 2002  
Lyris Member ID: 20268

---  
Email Address: dgarcia@retec.com  
Name: Dawn Garcia  
Type: normal  
Subscription type: mail  
Date joined: September 12, 2002  
Lyris Member ID: 19585

---  
Email Address: dgillette@toaks.org  
Name: Dennis Gillette  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19035

---  
Email Address: dhsroadrunner@aol.com  
Name: Buddy Hartman  
Type: normal  
Subscription type: mail  
Date joined: March 17, 2001  
Lyris Member ID: 12227

---  
Email Address: dilkay@ci.upland.ca.us  
Name: Dan Ilkay  
Type: normal  
Subscription type: mail

Date joined: January 31, 2002  
Lyris Member ID: 16859

---  
Email Address: district@sgvmosquito.org  
Name: District Manager  
Type: normal  
Subscription type: mail  
Date joined: April 14, 2003  
Lyris Member ID: 22028

---  
Email Address: Djensam@aol.com  
Name: Colleen A. Ortiz  
Type: normal  
Subscription type: mail  
Date joined: May 27, 2003  
Lyris Member ID: 22559

---  
Email Address: dkeller@baldwinpark.com  
Name: City of Baldwin Park  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18885

---  
Email Address: dlanderos@ci.ventura.ca.us  
Name: City of Ventura  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19009

---  
Email Address: dnanney@grlawyers.com  
Name: Donald Nanney  
Type: normal  
Subscription type: mail  
Date joined: January 02, 2003  
Lyris Member ID: 20549

---  
Email Address: douglas\_dunlap@ci.pomona.ca.us  
Name: City of Pomona  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18969

---  
Email Address: dougp@rhe.org  
Name: City of Rolling Hills Estates  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18974

---  
Email Address: dpoole@pooleshaffery.com  
Name: David Poole  
Type: normal  
Subscription type: mail

Date joined: March 13, 2002  
Lyris Member ID: 17463

---

Email Address: dreier.personal@mail.house.gov  
Name: David Dreier  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19031

---

Email Address: drourke@deltaenv.com  
Name: Dennis Rourke  
Type: normal  
Subscription type: mail  
Date joined: August 07, 2002  
Lyris Member ID: 19264

---

Email Address: drunyan@secor.com  
Name: Dorota Runyan  
Type: normal  
Subscription type: mail  
Date joined: August 20, 2002  
Lyris Member ID: 19390

---

Email Address: dspringer@theitgroup.com  
Name: David Springer  
Type: normal  
Subscription type: mail  
Date joined: November 28, 2000  
Lyris Member ID: 9300

---

Email Address: dwensloff@sierratel.com  
Name: David Wensloff  
Type: normal  
Subscription type: mail  
Date joined: December 18, 2000  
Lyris Member ID: 9789

---

Email Address: dwpi@chevron.com  
Name: David W. Pierce  
Type: normal  
Subscription type: mail  
Date joined: November 21, 2000  
Lyris Member ID: 9186

---

Email Address: earroyo@rmc.ca.gov  
Name: Enrique Arroyo  
Type: normal  
Subscription type: mail  
Date joined: April 23, 2003  
Lyris Member ID: 22167

---

Email Address: egarcia@ci.norwalk.ca.us  
Name: City of Norwalk  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002  
Lyris Member ID: 18960

---

Email Address: ekiepke@willdan.com  
Name: Elroy Kiepke  
Type: normal  
Subscription type: mail  
Date joined: April 03, 2002  
Lyris Member ID: 17835

---

Email Address: ekuewa@ashconsulting.net  
Name: Eric Kuewa  
Type: normal  
Subscription type: mail  
Date joined: April 30, 2003  
Lyris Member ID: 22274

---

Email Address: elton.gallegly@mail.house.gov  
Name: Elton Gallegly  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19041

---

Email Address: emasry@toaks.org  
Name: City of Thousand Oaks  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19006

---

Email Address: environmentalgeoscience@yahoo.com  
Name: Jeff Findl  
Type: normal  
Subscription type: mail  
Date joined: February 26, 2002  
Lyris Member ID: 17281

---

Email Address: eperrodin@comptoncity.org  
Name: City of Compton  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18900

---

Email Address: Erik.Ricardo@vopak.com  
Name: Erik John Ricardo  
Type: normal  
Subscription type: mail  
Date joined: October 17, 2000  
Lyris Member ID: 8050

---

Email Address: etaylor@usenvironet.com  
Name: Eric Taylor  
Type: normal  
Subscription type: mail

Date joined: August 22, 2002  
Lyris Member ID: 19418

---  
Email Address: fbrown@inreach.com  
Name: Fred O Brown  
Type: normal  
Subscription type: mail  
Date joined: October 01, 2001  
Lyris Member ID: 14509

---  
Email Address: fbush@pesenv.com  
Name: Francois Bush  
Type: normal  
Subscription type: mail  
Date joined: December 14, 2000  
Lyris Member ID: 9715

---  
Email Address: fgonzales@lynwood.ca.us  
Name: City of Lynwood  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18951

---  
Email Address: frieszbp@bv.com  
Name: Brian Friesz  
Type: normal  
Subscription type: mail  
Date joined: April 16, 2001  
Lyris Member ID: 12765

---  
Email Address: gail.robinson@mail.co.ventura.ca.us  
Name: Gail Robinson  
Type: normal  
Subscription type: mail  
Date joined: April 18, 2003  
Lyris Member ID: 22114

---  
Email Address: galanter@council.lacity.org  
Name: Ruth Galanter  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19073

---  
Email Address: garcetti@council.lacity.org  
Name: Eric Garcetti  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19042

---  
Email Address: gary.miller@mail.house.gov  
Name: Gary G. Miller  
Type: normal  
Subscription type: mail

Date joined: July 24, 2002  
Lyris Member ID: 19043

---  
Email Address: gbordner@tmmna.com  
Name: Greg Bordner  
Type: normal  
Subscription type: mail  
Date joined: April 14, 2003  
Lyris Member ID: 22014

---  
Email Address: gchicots@soelmonte.org  
Name: City of South El Monte  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18994

---  
Email Address: gcronk@tait.com  
Name: Gary Cronk  
Type: normal  
Subscription type: mail  
Date joined: September 12, 2002  
Lyris Member ID: 19586

---  
Email Address: gdembegi@san.lacity.org  
Name: Gus Dembegiotes  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18986

---  
Email Address: gdolan@citymb.info  
Name: City of Manhattan Beach  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18953

---  
Email Address: gem@san.lacity.org  
Name: Gerald McGovern  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18783

---  
Email Address: gfredlee@aol.com  
Name: Dr. G. Fred Lee  
Type: normal  
Subscription type: mail  
Date joined: June 05, 2003  
Lyris Member ID: 22745

---  
Email Address: ggreene@downeyca.org  
Name: Gerry Greene  
Type: normal  
Subscription type: mail



Date joined: November 26, 2002  
Lyris Member ID: 20305

---  
Email Address: gilw@lwa.com  
Name: Gil Wheeler  
Type: normal  
Subscription type: mail  
Date joined: January 22, 2002  
Lyris Member ID: 16677

---  
Email Address: GMinter@GreerDaileyMinter.com  
Name: George Minter  
Type: normal  
Subscription type: mail  
Date joined: March 10, 2003  
Lyris Member ID: 21498

---  
Email Address: gmusejr@mwd.dst.ca.us  
Name: George W. Muse Jr.  
Type: normal  
Subscription type: mail  
Date joined: October 05, 2000  
Lyris Member ID: 7498

---  
Email Address: gonzam@bp.com  
Name: Maryann Gonzalez  
Type: normal  
Subscription type: mail  
Date joined: April 30, 2001  
Lyris Member ID: 13051

---  
Email Address: gregkorduner@mindspring.com  
Name: City of Huntington Park  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18920

---  
Email Address: greuel@council.lacity.org  
Name: Wendy Greuel  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19078

---  
Email Address: griset@scag.ca.gov  
Name: Daniel E. Griset  
Type: normal  
Subscription type: mail  
Date joined: October 09, 2002  
Lyris Member ID: 19852

---  
Email Address: gsouthard@ci.claremont.ca.us  
Name: City of Claremont  
Type: normal  
Subscription type: mail

Date joined: July 22, 2002  
Lyris Member ID: 18897

---  
Email Address: hahn@council.lacity.org  
Name: Janice Hahn  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19058

---  
Email Address: HCollin2@dhs.ca.gov  
Name: Heather Collins  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17553

---  
Email Address: henryg@camrosa.com  
Name: J. Henry Graumlich  
Type: normal  
Subscription type: mail  
Date joined: March 19, 2002  
Lyris Member ID: 17595

---  
Email Address: hfroelic@san.lacity.org  
Name: Heloise Froelich  
Type: normal  
Subscription type: mail  
Date joined: May 23, 2003  
Lyris Member ID: 22534

---  
Email Address: hhlawndale@aol.com  
Name: City of Lawndale  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18932

---  
Email Address: hledford@lapuente.org  
Name: City of La Puente  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18928

---  
Email Address: hmerenda@santa-clarita.com  
Name: Heather Merenda  
Type: normal  
Subscription type: mail  
Date joined: June 11, 2003  
Lyris Member ID: 22799

---  
Email Address: hnahai@nahailaw.com  
Name: H. David Nahai  
Type: normal  
Subscription type: mail

Date joined: March 15, 2002  
Lyris Member ID: 17490

---  
Email Address: holden@council.lacity.org  
Name: Nate Holden  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19068

---  
Email Address: howard.berman@mail.house.gov  
Name: Howard L. Berman  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19050

---  
Email Address: howard@fuscoe.com  
Name: Howard Wen  
Type: normal  
Subscription type: mail  
Date joined: February 03, 2003  
Lyris Member ID: 20950

---  
Email Address: ian@fuscoe.com  
Name: Ian Adam  
Type: normal  
Subscription type: mail  
Date joined: August 06, 2002  
Lyris Member ID: 19227

---  
Email Address: insideepa2000@yahoo.com  
Name: Jared Saylor  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2003  
Lyris Member ID: 23308

---  
Email Address: Jack O'Connell,, State Senate,, Senator.OConnell@sen.ca.gov  
Name: Jack O'Connell  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19052

---  
Email Address: jalee@council.lacity.org  
Name: Julie Lee  
Type: normal  
Subscription type: mail  
Date joined: March 22, 2002  
Lyris Member ID: 17668

---  
Email Address: James\_Anderson@hfa.com  
Name: James Anderson  
Type: normal  
Subscription type: mail

Date joined: July 20, 2002  
Lyris Member ID: 18842

---  
Email Address: jane.harman@mail.house.gov  
Name: Jane Harman  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19057

---  
Email Address: javiergcardenas@hotmail.com  
Name: Javier G. Cardenas  
Type: normal  
Subscription type: mail  
Date joined: February 03, 2002  
Lyris Member ID: 16879

---  
Email Address: jclairday@mwd.dst.ca.us  
Name: John Clairday  
Type: normal  
Subscription type: mail  
Date joined: November 21, 2000  
Lyris Member ID: 9180

---  
Email Address: jcoelho@astor-phillips.com  
Name: James R. Coelho  
Type: normal  
Subscription type: mail  
Date joined: January 07, 2003  
Lyris Member ID: 20644

---  
Email Address: jcolston@ocsd.com  
Name: James Colston  
Type: normal  
Subscription type: mail  
Date joined: April 15, 2003  
Lyris Member ID: 22056

---  
Email Address: jcostanza@bakerlaw.com  
Name: Jennifer Costanza  
Type: normal  
Subscription type: mail  
Date joined: November 17, 2000  
Lyris Member ID: 9095

---  
Email Address: jdagdigian@waterstone-env.com  
Name: Jeffrey V. Dagdigian  
Type: normal  
Subscription type: mail  
Date joined: July 29, 2001  
Lyris Member ID: 14266

---  
Email Address: jdonatucci@millerbrooksenv.com  
Name: John Donatucci  
Type: normal  
Subscription type: mail

Date joined: January 07, 2003  
Lyris Member ID: 20631

---

Email Address: JEANNE@WRAENG.COM  
Name: Jeanne Geno  
Type: normal  
Subscription type: mail  
Date joined: July 18, 2002  
Lyris Member ID: 18816

---

Email Address: JEmbick@ppco.com  
Name: John Embick  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17551

---

Email Address: jfalcone@co.slo.ca.us  
Name: Jill Falcone  
Type: normal  
Subscription type: mail  
Date joined: January 23, 2003  
Lyris Member ID: 20880

---

Email Address: jfulwood@lacanadaflintridge.ca.gov  
Name: City of La Canada-Flintridge  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18925

---

Email Address: jgamble@lvmwd.dst.ca.us  
Name: Jacqy Gamble  
Type: normal  
Subscription type: mail  
Date joined: October 11, 2000  
Lyris Member ID: 7862

---

Email Address: jgeever@surfrider.org  
Name: Joe Geever  
Type: normal  
Subscription type: mail  
Date joined: November 22, 2002  
Lyris Member ID: 20271

---

Email Address: jgeno@socal.rr.com  
Name: Jeanne Geno  
Type: normal  
Subscription type: mail  
Date joined: June 25, 2002  
Lyris Member ID: 18624

---

Email Address: jhahn@mayor.lacity.org  
Name: City of Los Angeles  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002  
Lyris Member ID: 18950

---  
Email Address: jhendrickson@pvestates.org  
Name: City of Palos Verdes Estates  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18965

---  
Email Address: jhuff@wpinc.com  
Name: John Huff  
Type: normal  
Subscription type: mail  
Date joined: August 28, 2000  
Lyris Member ID: 6414

---  
Email Address: jim.steele@tetrattech.com  
Name: James R. Steele  
Type: normal  
Subscription type: mail  
Date joined: January 10, 2002  
Lyris Member ID: 16429

---  
Email Address: jjl@procopio.com  
Name: John Lormon  
Type: normal  
Subscription type: mail  
Date joined: September 11, 2000  
Lyris Member ID: 6749

---  
Email Address: jjohnson@comptoncity.org  
Name: City of Compton  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18899

---  
Email Address: jkelly@toaks.org  
Name: Joanne Kelly  
Type: normal  
Subscription type: mail  
Date joined: December 24, 2001  
Lyris Member ID: 16050

---  
Email Address: JKREJCI@LADPW.ORG  
Name: Joy Krejci  
Type: normal  
Subscription type: mail  
Date joined: November 22, 2002  
Lyris Member ID: 20264

---  
Email Address: jleserman@mcguireinc.com  
Name: James Leserman  
Type: normal  
Subscription type: mail



Date joined: March 29, 2002  
Lyris Member ID: 17794

---  
Email Address: jlinton@council.lacity.org  
Name: Joe Linton  
Type: normal  
Subscription type: mail  
Date joined: January 31, 2003  
Lyris Member ID: 20948

---  
Email Address: jmelby@coastal.ca.gov  
Name: Jeff Melby  
Type: normal  
Subscription type: mail  
Date joined: April 18, 2003  
Lyris Member ID: 22103

---  
Email Address: jmiller3@ch2m.com  
Name: Judi Miller  
Type: normal  
Subscription type: mail  
Date joined: April 14, 2003  
Lyris Member ID: 22017

---  
Email Address: jmoore@insidevc.com  
Name: John Moore  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17548

---  
Email Address: joann.weber@amec.com  
Name: Jo Ann Weber  
Type: normal  
Subscription type: mail  
Date joined: April 01, 2002  
Lyris Member ID: 17796

---  
Email Address: joemayer@webtv.net  
Name: Joseph Paul Mayer Iii  
Type: normal  
Subscription type: mail  
Date joined: March 15, 2001  
Lyris Member ID: 12178

---  
Email Address: john.kosco@tetrattech.com  
Name: John Kosco  
Type: normal  
Subscription type: mail  
Date joined: October 01, 2002  
Lyris Member ID: 19755

---  
Email Address: JohnB648@AOL.com  
Name: John Bullington  
Type: normal  
Subscription type: mail



Date joined: January 15, 2003  
Lyris Member ID: 20777

---  
Email Address: joman@secor.com  
Name: Jack Oman  
Type: normal  
Subscription type: mail  
Date joined: November 10, 2000  
Lyris Member ID: 8918

---  
Email Address: JPNEU@hnpc.com  
Name: Jeffrey P. Neu  
Type: normal  
Subscription type: mail  
Date joined: March 17, 2002  
Lyris Member ID: 17518

---  
Email Address: jprice@rb4.swrcb.ca.gov  
Name: Jack Price  
Type: normal  
Subscription type: mail  
Date joined: September 07, 2000  
Lyris Member ID: 6668

---  
Email Address: jpulido@ci.san-fernando.ca.us  
Name: City of San Fernando  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18979

---  
Email Address: jslezak@iyph.com  
Name: John A. Slezak  
Type: normal  
Subscription type: mail  
Date joined: April 16, 2003  
Lyris Member ID: 22072

---  
Email Address: jsolis@lapuente.org  
Name: City of La Puente  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18927

---  
Email Address: jstarbird@ci.glendale.ca.us  
Name: City of Glendale  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18913

---  
Email Address: jstiver@vortechncs.com  
Name: John Stiver  
Type: normal  
Subscription type: mail

Date joined: April 04, 2001  
Lyris Member ID: 12570

---  
Email Address: jtaggart@ggfirm.com  
Name: Jennifer Taggart  
Type: normal  
Subscription type: mail  
Date joined: June 11, 2001  
Lyris Member ID: 13631

---  
Email Address: jteravskis@wgr-sw.com  
Name: John Teravskis  
Type: normal  
Subscription type: mail  
Date joined: October 23, 2000  
Lyris Member ID: 8278

---  
Email Address: jtorres@ci.vernon.ca.us  
Name: Jerrick Torres  
Type: normal  
Subscription type: mail  
Date joined: February 10, 2003  
Lyris Member ID: 21036

---  
Email Address: jtrouzan@cityofinglewood.org  
Name: City of Inglewood  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18922

---  
Email Address: jtruhan@mwd.dst.ca.us  
Name: Joyce Truhan Clark  
Type: normal  
Subscription type: mail  
Date joined: June 12, 2001  
Lyris Member ID: 13663

---  
Email Address: juang@lachamber.org  
Name: Juan R. Gonzalez  
Type: normal  
Subscription type: mail  
Date joined: October 20, 2000  
Lyris Member ID: 8199

---  
Email Address: kae@jmbm.com  
Name: Ken Ehrlich  
Type: normal  
Subscription type: mail  
Date joined: April 16, 2003  
Lyris Member ID: 22064

---  
Email Address: kathleenmcgowan@caaprofessionals.com  
Name: Kathleen Mcgowan  
Type: normal  
Subscription type: mail

Date joined: April 29, 2002  
Lyris Member ID: 18082

---  
Email Address: kathy.long@mail.co.ventura.ca.us  
Name: Kathy Long  
Type: normal  
Subscription type: mail  
Date joined: April 18, 2003  
Lyris Member ID: 22112

---  
Email Address: ken@gowater.com  
Name: Ken Smedley  
Type: normal  
Subscription type: mail  
Date joined: February 10, 2002  
Lyris Member ID: 17067

---  
Email Address: kerry.cavanaugh@dailynews.com  
Name: Kerry Cavanaugh  
Type: normal  
Subscription type: mail  
Date joined: October 31, 2002  
Lyris Member ID: 20072

---  
Email Address: kevink@cpha.net  
Name: Kevin Keefer  
Type: normal  
Subscription type: mail  
Date joined: December 26, 2001  
Lyris Member ID: 16076

---  
Email Address: kfarfsing@ci.signal-hill.ca.us  
Name: City of Signal Hill  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18992

---  
Email Address: khdun@aol.com, City  
Name: City of Glendora Kathy Dunbabin  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19060

---  
Email Address: klichtig@ci.malibu.ca.us  
Name: City of Malibu  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18952

---  
Email Address: kohnmeiss@ci.camarillo.ca.us  
Name: City of Camarillo  
Type: normal  
Subscription type: mail

Date joined: July 22, 2002  
Lyris Member ID: 18894

---  
Email Address: koleary@ci.san-dimas.ca.us  
Name: Kym O'leary  
Type: normal  
Subscription type: mail  
Date joined: October 26, 2000  
Lyris Member ID: 8503

---  
Email Address: kpulskamp@santa-clarita.com  
Name: City of Santa Clarita  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18982

---  
Email Address: kruffell@lacsds.org  
Name: Kristen Ruffell  
Type: normal  
Subscription type: mail  
Date joined: April 16, 2002  
Lyris Member ID: 17966

---  
Email Address: ksusilo@psomas.com  
Name: Ken Susilo  
Type: normal  
Subscription type: mail  
Date joined: December 06, 2000  
Lyris Member ID: 9531

---  
Email Address: kuis69@hotmail.com  
Name: Eric Kuewa  
Type: normal  
Subscription type: mail  
Date joined: February 22, 2002  
Lyris Member ID: 17233

---  
Email Address: kwf@san.lacity.org  
Name: Kris Flaig  
Type: normal  
Subscription type: mail  
Date joined: March 20, 2002  
Lyris Member ID: 17607

---  
Email Address: kwong@ci.glendale.ca.us  
Name: Karen Wong  
Type: normal  
Subscription type: mail  
Date joined: January 29, 2003  
Lyris Member ID: 20924

---  
Email Address: labonge@council.lacity.org  
Name: Tom La Bonge  
Type: normal  
Subscription type: mail

Date joined: July 24, 2002  
Lyris Member ID: 19076

---  
Email Address: lamirada@cityoflm.org  
Name: City of La Mirada  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18926

---  
Email Address: laura.plotkin@sen.ca.gov  
Name: Sheila Kuehl  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19074

---  
Email Address: lbarker@lawco.com  
Name: Larry Barker  
Type: normal  
Subscription type: mail  
Date joined: October 18, 2000  
Lyris Member ID: 8060

---  
Email Address: ldarmiento2@yahoo.com  
Name: Laurence Darmiento  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19081

---  
Email Address: leinbakj@apci.com  
Name: Keith J. Leinbach  
Type: normal  
Subscription type: mail  
Date joined: March 07, 2001  
Lyris Member ID: 12006

---  
Email Address: letcherk@mta.net  
Name: Kathleen Letcher  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17576

---  
Email Address: lgallard@rb4.swrcb.ca.gov  
Name: Laura C. Gallardo  
Type: normal  
Subscription type: mail  
Date joined: February 20, 2002  
Lyris Member ID: 17209

---  
Email Address: limalms@ci.long-beach.ca.us  
Name: Lisa Malmsten  
Type: normal  
Subscription type: mail

Date joined: October 16, 2000  
Lyris Member ID: 8023

---  
Email Address: linda.lowry@ci.diamond-bar.ca.us  
Name: City of Diamond Bar  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18903

---  
Email Address: linda.richardson@mail.co.ventura.ca.us  
Name: Linda Richardson  
Type: normal  
Subscription type: mail  
Date joined: September 26, 2000  
Lyris Member ID: 7030

---  
Email Address: lisa.hamilton@corporate.ge.com  
Name: Lisa A. Hamilton  
Type: normal  
Subscription type: mail  
Date joined: July 01, 2003  
Lyris Member ID: 22967

---  
Email Address: lisa.tuck@piona.com  
Name: Lisa Tuck  
Type: normal  
Subscription type: mail  
Date joined: October 04, 2002  
Lyris Member ID: 19787

---  
Email Address: ljackson@torrnet.com  
Name: City of Torrance  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19007

---  
Email Address: lmagelni@simivalley.org  
Name: Laura Magelnicki  
Type: normal  
Subscription type: mail  
Date joined: April 21, 2003  
Lyris Member ID: 22120

---  
Email Address: loconnell@calwater.com  
Name: Leah O'connell  
Type: normal  
Subscription type: mail  
Date joined: March 12, 2003  
Lyris Member ID: 21548

---  
Email Address: lois.capps@mail.house.gov  
Name: Lois Capps  
Type: normal  
Subscription type: mail



Date joined: July 24, 2002  
Lyris Member ID: 19063

---

Email Address: lou.garcia@redondo.org  
Name: City of Redondo Beach  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18972

---

Email Address: Iraab@caslab.com  
Name: Leo Raab  
Type: normal  
Subscription type: mail  
Date joined: January 07, 2003  
Lyris Member ID: 20655

---

Email Address: luwan@cityofalhambra.org  
Name: City of Alhambra  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18857

---

Email Address: Malloy@law.ucla.edu  
Name: Timothy Malloy  
Type: normal  
Subscription type: mail  
Date joined: October 24, 2000  
Lyris Member ID: 8366

---

Email Address: mark.jirgal@goemsinc.com  
Name: Mark Jirgal  
Type: normal  
Subscription type: mail  
Date joined: September 19, 2002  
Lyris Member ID: 19662

---

Email Address: mark.kinter@tenantco.com  
Name: Mark D. Kinter  
Type: normal  
Subscription type: mail  
Date joined: February 15, 2001  
Lyris Member ID: 11542

---

Email Address: mark.pumford@ci.oxnard.ca.us  
Name: Mark Pumford  
Type: normal  
Subscription type: mail  
Date joined: February 27, 2002  
Lyris Member ID: 17292

---

Email Address: marym@water.ca.gov  
Name: Mary M. Miller  
Type: normal  
Subscription type: mail



Date joined: January 18, 2002  
Lyris Member ID: 16613

---  
Email Address: mas@san.ci.la.ca.us  
Name: Mark Starr  
Type: normal  
Subscription type: mail  
Date joined: December 04, 2000  
Lyris Member ID: 9453

---  
Email Address: MATT\_LIAO@DOT.CA.GOV  
Name: Matt Liao  
Type: normal  
Subscription type: mail  
Date joined: November 22, 2002  
Lyris Member ID: 20260

---  
Email Address: mayor@ci.long-beach.ca.us  
Name: City of Beverly Hills  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18890

---  
Email Address: mayor@ci.ojai.ca.us  
Name: City of Ojai  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18962

---  
Email Address: mbarminski@aol.com  
Name: Mike Barminski  
Type: normal  
Subscription type: mail  
Date joined: May 29, 2001  
Lyris Member ID: 13458

---  
Email Address: mbarrett@ladpw.org  
Name: Melinda Barrett  
Type: normal  
Subscription type: mail  
Date joined: May 20, 2002  
Lyris Member ID: 18284

---  
Email Address: mbartlet@mailbox.lacity.org  
Name: Melinda Bartlett  
Type: normal  
Subscription type: mail  
Date joined: April 11, 2003  
Lyris Member ID: 22000

---  
Email Address: mbgilmartin@earthlink.net  
Name: Mark B. Gilmartin  
Type: normal  
Subscription type: mail

Date joined: April 18, 2003  
Lyris Member ID: 22104

---  
Email Address: mckeon.personal@mail.house.gov  
Name: Howard P. "Buck" McKeon  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19051

---  
Email Address: mcrisostomo@calscience.com  
Name: Mike Crisostomo  
Type: normal  
Subscription type: mail  
Date joined: September 25, 2002  
Lyris Member ID: 19716

---  
Email Address: mecatani@ci.covina.ca.us  
Name: City of Covina  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18901

---  
Email Address: megan@bellflower.org  
Name: City of Bellflower  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18888

---  
Email Address: mel.oleson@boeing.com  
Name: Melvin Oleson  
Type: normal  
Subscription type: mail  
Date joined: May 16, 2001  
Lyris Member ID: 13258

---  
Email Address: melinda.talent@mail.co.ventura.ca.us  
Name: Melinda Talent  
Type: normal  
Subscription type: mail  
Date joined: December 18, 2000  
Lyris Member ID: 9780

---  
Email Address: mgagan@rosekindel.com  
Name: Michael S. Gagan  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17567

---  
Email Address: mgordon@elsegundo.org  
Name: City of El Segundo  
Type: normal  
Subscription type: mail

Date joined: July 22, 2002  
Lyris Member ID: 18908

---

Email Address: mheller@ppco.com  
Name: Miles Heller  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17547

---

Email Address: mhogan@mwe.com  
Name: Mary Ellen Hogan  
Type: normal  
Subscription type: mail  
Date joined: May 31, 2002  
Lyris Member ID: 18387

---

Email Address: michael@hulsen.com  
Name: J. Michael Huls Rea  
Type: normal  
Subscription type: mail  
Date joined: January 14, 2002  
Lyris Member ID: 16478

---

Email Address: mike@rbf.com  
Name: Mike Moore  
Type: normal  
Subscription type: mail  
Date joined: November 30, 2000  
Lyris Member ID: 9391

---

Email Address: millender.mcdonald@mail.house.gov  
Name: Juanita Millender-McDonald  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19059

---

Email Address: miscikowski@council.lacity.org  
Name: Cindy Miscikowski  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18855

---

Email Address: mlansdell@ci.gardena.ca.us  
Name: City of Gardena  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18912

---

Email Address: mmoore001@earthlink.net  
Name: Michael Moore  
Type: normal  
Subscription type: mail

Date joined: December 07, 2000  
Lyris Member ID: 9585

---  
Email Address: mmouw@ci.glendora.ca.us  
Name: City of Glendora  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18914

---  
Email Address: moillataguerre@ci.glendale.ca.us  
Name: Maurice Oillataguerre  
Type: normal  
Subscription type: mail  
Date joined: March 26, 2002  
Lyris Member ID: 17704

---  
Email Address: MOORE.DON1@worldnet.att.net  
Name: Don Moore  
Type: normal  
Subscription type: mail  
Date joined: October 15, 2000  
Lyris Member ID: 7937

---  
Email Address: mpauls@sgch.org  
Name: City of San Gabriel  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18980

---  
Email Address: mperkins@downeyca.org  
Name: City of Downey  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18904

---  
Email Address: mrl@ci.la-verne.ca.us  
Name: City of La Verne  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18929

---  
Email Address: mrrpv@palosverdes.com  
Name: City of Rancho Palos Verdes  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18971

---  
Email Address: msedell@simivalley.org  
Name: City of Simi Valley  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002  
 Lyris Member ID: 18993

---  
 Email Address: mshaley@gorillarecoverysystems.com  
 Name: Michael S. Haley  
 Type: normal  
 Subscription type: mail  
 Date joined: July 16, 2003  
 Lyris Member ID: 23268

---  
 Email Address: mstrenn@elsegundo.org  
 Name: City of El Segundo  
 Type: normal  
 Subscription type: mail  
 Date joined: July 22, 2002  
 Lyris Member ID: 18909

---  
 Email Address: msubbotin@newhall.com  
 Name: Mark Subbotin  
 Type: normal  
 Subscription type: mail  
 Date joined: January 06, 2003  
 Lyris Member ID: 20601

---  
 Email Address: msweeney@ucla.edu  
 Name: Michelle Sophia Sweeney  
 Type: normal  
 Subscription type: mail  
 Date joined: February 05, 2001  
 Lyris Member ID: 11240

---  
 Email Address: mw@winefieldassoc.com  
 Name: Matt Winefield  
 Type: normal  
 Subscription type: mail  
 Date joined: June 25, 2001  
 Lyris Member ID: 13792

---  
 Email Address: myamaguc@rb4.swrcb.ca.gov  
 Name: Marianne Yamaguchi  
 Type: normal  
 Subscription type: mail  
 Date joined: July 09, 2002  
 Lyris Member ID: 18713

---  
 Email Address: napolitano.personal@mail.house.gov  
 Name: Grace F. Napolitano  
 Type: normal  
 Subscription type: mail  
 Date joined: July 24, 2002  
 Lyris Member ID: 19046

---  
 Email Address: ndadian@cityofartesia.org  
 Name: City of Artesia  
 Type: normal  
 Subscription type: mail



Date joined: July 22, 2002  
Lyris Member ID: 18859

---  
Email Address: negarnoushkam@yahoo.com  
Name: Negar Noushkam  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18809

---  
Email Address: ngranquist@dbsr.com  
Name: Nicole Granquist  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18796

---  
Email Address: NormanMD@cbcph.navy.mil  
Name: Michelle Norman  
Type: normal  
Subscription type: mail  
Date joined: March 28, 2001  
Lyris Member ID: 12457

---  
Email Address: nziemba@irgco.com  
Name: Neil Ziemba  
Type: normal  
Subscription type: mail  
Date joined: January 11, 2002  
Lyris Member ID: 16450

---  
Email Address: ojaicity@ci.ojai.ca.us  
Name: City of Ojai  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18961

---  
Email Address: oxnardcty@ci.oxnard.ca.us  
Name: City of Oxnard  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18963

---  
Email Address: pacheco@council.lacity.org  
Name: Nick Pacheco  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19070

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Email Address: padilla@council.lacity.org  
Name: Alex Padilla  
Type: normal  
Subscription type: mail

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Date joined: July 22, 2002  
Lyris Member ID: 18849

---

Email Address: parevalo@weho.org  
Name: City of West Hollywood  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19016

---

Email Address: parmentier@thriftyoil.com  
Name: Paul Parmentier  
Type: normal  
Subscription type: mail  
Date joined: July 18, 2002  
Lyris Member ID: 18815

---

Email Address: patrick.covert@valero.com  
Name: Patrick M. Covert  
Type: normal  
Subscription type: mail  
Date joined: June 20, 2002  
Lyris Member ID: 18571

---

Email Address: paul.singarella@lw.com  
Name: Paul Singarella  
Type: normal  
Subscription type: mail  
Date joined: April 12, 2002  
Lyris Member ID: 17949

---

Email Address: pcurrie@ci.pasadena.ca.us  
Name: Phyllis E. Currie  
Type: normal  
Subscription type: mail  
Date joined: April 23, 2003  
Lyris Member ID: 22165

---

Email Address: perry@council.lacity.org  
Name: Jan Perry  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19056

---

Email Address: peter.whitney@mail.co.ventura.ca.us  
Name: Pete Whitney  
Type: normal  
Subscription type: mail  
Date joined: October 23, 2000  
Lyris Member ID: 8295

---

Email Address: pjscalzo@rigginginternational.com  
Name: Peter James Scalzo  
Type: normal  
Subscription type: mail

Date joined: January 04, 2002  
Lyris Member ID: 16278

---

Email Address: plangham@ci.beverly-hills.ca.us  
Name: City of Beverly Hills  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18889

---

Email Address: pliriarte@cityofindustry.org  
Name: City of Industry  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18921

---

Email Address: pow@san.ci.la.ca.us  
Name: Penny Weiland  
Type: normal  
Subscription type: mail  
Date joined: November 29, 2000  
Lyris Member ID: 9321

---

Email Address: pparmentier@theitgroup.com  
Name: Paul Parmentier  
Type: normal  
Subscription type: mail  
Date joined: April 18, 2001  
Lyris Member ID: 12843

---

Email Address: pskeels@ci.santa-paula.ca.us  
Name: City of Santa Paula  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18985

---

Email Address: pvcwd.agwater@verizon.net  
Name: Michael L. Miller  
Type: normal  
Subscription type: mail  
Date joined: July 14, 2003  
Lyris Member ID: 23111

---

Email Address: pwbcarson@mx.ci.thousand-oaks.ca.us  
Name: Bob Carson  
Type: normal  
Subscription type: mail  
Date joined: November 16, 2000  
Lyris Member ID: 9063

---

Email Address: pwest@paramountcity.com  
Name: City of Paramount  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002

Lyris Member ID: 18966

---

Email Address: quirino.wong@vopak.com

Name: Quirino Wong

Type: normal

Subscription type: mail

Date joined: March 15, 2002

Lyris Member ID: 17495

---

Email Address: raharris@c-logic.net

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Type: normal

Subscription type: mail

Date joined: April 11, 2003

Lyris Member ID: 22011

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Email Address: randersens@ci.burbank.ca.us

Name: Rodney Andersen

Type: normal

Subscription type: mail

Date joined: March 18, 2002

Lyris Member ID: 17522

---

Email Address: randy@wqa.com

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Type: normal

Subscription type: mail

Date joined: October 17, 2000

Lyris Member ID: 8028

---

Email Address: rbecker@ci.burbank.ca.us

Name: Rick Becker

Type: normal

Subscription type: mail

Date joined: June 07, 2001

Lyris Member ID: 13594

---

Email Address: rclark@cityofavalon.com

Name: City of Avalon

Type: normal

Subscription type: mail

Date joined: July 22, 2002

Lyris Member ID: 18860

---

Email Address: rcole@ci.azusa.ca.us

Name: City of Azusa

Type: normal

Subscription type: mail

Date joined: July 22, 2002

Lyris Member ID: 18884

---

Email Address: rdalfarra@wcenviro.com

Name: Rob Dal Farra

Type: normal

Subscription type: mail

Date joined: June 10, 2003  
Lyris Member ID: 22777

---  
Email Address: reyes@council.lacity.org  
Name: Ed Reyes  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19038

---  
Email Address: rez1@earthlink.net  
Name: David Reznick  
Type: normal  
Subscription type: mail  
Date joined: March 20, 2003  
Lyris Member ID: 21768

---  
Email Address: rferber@ix.netcom.com  
Name: Robin Ferber  
Type: normal  
Subscription type: mail  
Date joined: August 29, 2000  
Lyris Member ID: 6471

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Email Address: rguzman@wbcounsel.com  
Name: Renee Guzman-simon  
Type: normal  
Subscription type: mail  
Date joined: April 05, 2002  
Lyris Member ID: 17856

---  
Email Address: RHARRIS@rb4.swrcb.ca.gov  
Name: Ronji Harris  
Type: normal  
Subscription type: mail  
Date joined: August 16, 2000  
Lyris Member ID: 6043

---  
Email Address: rhaughy@la.eticeng.com  
Name: Ryan Haughy  
Type: normal  
Subscription type: mail  
Date joined: February 14, 2003  
Lyris Member ID: 21144

---  
Email Address: rhawkins@earthlink.net  
Name: Robert C. Hawkins  
Type: normal  
Subscription type: mail  
Date joined: February 20, 2003  
Lyris Member ID: 21270

---  
Email Address: richard.sandell@vopak.com  
Name: Richard Sandell  
Type: normal  
Subscription type: mail

Date joined: March 15, 2002  
Lyris Member ID: 17493

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Email Address: RKearney@san.lacity.org  
Name: Ray Kearney  
Type: normal  
Subscription type: mail  
Date joined: April 17, 2003  
Lyris Member ID: 22081

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Email Address: Rmaestu@swrcb.ca.gov  
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Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18802

---

Email Address: rmilne@aptwater.com  
Name: Ray Milne  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18798

---

Email Address: robert.wu@dot.ca.gov  
Name: Bob Wu  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18776

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Email Address: robert\_wu@dot.ca.gov  
Name: Bob Wu  
Type: normal  
Subscription type: mail  
Date joined: August 15, 2002  
Lyris Member ID: 19338

---

Email Address: royce.personal@mail.house.gov  
Name: Edward R. Royce  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19039

---

Email Address: rpayne@ci.fillmore.ca.us  
Name: City of Fillmore  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18910

---

Email Address: rromain@dpw.co.la.ca.us  
Name: Roland Romain  
Type: normal  
Subscription type: mail

Date joined: November 26, 2002  
Lyris Member ID: 20303

---  
Email Address: rstewart3@earthlink.net  
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Type: normal  
Subscription type: mail  
Date joined: March 16, 2002  
Lyris Member ID: 17502

---  
Email Address: rtorres@cityofmontebello.com  
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Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18956

---  
Email Address: rwestdyke@ci.camarillo.ca.us  
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Type: normal  
Subscription type: mail  
Date joined: September 20, 2000  
Lyris Member ID: 6970

---  
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Type: normal  
Subscription type: mail  
Date joined: March 16, 2001  
Lyris Member ID: 12216

---  
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Type: normal  
Subscription type: mail  
Date joined: October 12, 2000  
Lyris Member ID: 7885

---  
Email Address: ryoung@bwslaw.com  
Name: Rufus Young  
Type: normal  
Subscription type: mail  
Date joined: March 20, 2001  
Lyris Member ID: 12259

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Email Address: sandy.galvez@westcov.org  
Name: City of West Covina  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19015

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Email Address: sbrothers@trihydro.com  
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Type: normal  
Subscription type: mail

Date joined: January 09, 2003  
Lyris Member ID: 20697

---  
Email Address: sburrell@hermosabch.org  
Name: City of Hermosa Beach  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18918

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Email Address: Scain@rb4.swrcb.ca.gov  
Name: Steve Cain  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18772

---  
Email Address: schroederdj@cdm.com  
Name: Donald Schroeder  
Type: normal  
Subscription type: mail  
Date joined: April 24, 2003  
Lyris Member ID: 22177

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Email Address: scullen@theitgroup.com  
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Type: normal  
Subscription type: mail  
Date joined: April 10, 2002  
Lyris Member ID: 17906

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Email Address: SDC@HaleyAldrich.com  
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Type: normal  
Subscription type: mail  
Date joined: July 11, 2002  
Lyris Member ID: 18737

---  
Email Address: Senator.Alarcon@sen.ca.gov  
Name: Richard Alarcon  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19071

---  
Email Address: Senator.Bowen@sen.ca.gov  
Name: Debra Bowen  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19034

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Email Address: Senator.Escutia@sen.ca.gov  
Name: Martha Escutia  
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Date joined: July 24, 2002  
Lyris Member ID: 19066

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Email Address: Senator.Karnette@sen.ca.gov  
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Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18851

---  
Email Address: Senator.Knight@sen.ca.gov  
Name: William "Pete" Knight  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19079

---  
Email Address: Senator.Margett@sen.ca.gov  
Name: Bob Margett  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18853

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Email Address: Senator.Mcclintock@sen.ca.gov  
Name: Tom McClintock  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19077

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Email Address: Senator.Murray@sen.ca.gov  
Name: Kevin Murray  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19061

---  
Email Address: Senator.OConnell@sen.ca.gov  
Name: Jack O'Connell  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19053

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Email Address: Senator.Polanco@sen.ca.gov  
Name: Richard Polanco  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19072

---  
Email Address: Senator.Ramiro@sen.ca.gov  
Name: Gloria Ramiro  
Type: normal  
Subscription type: mail

Date joined: July 24, 2002  
Lyris Member ID: 19045

---

Email Address: Senator.Scott@sen.ca.gov  
Name: Jack Scott  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19054

---

Email Address: Senator.Soto@sen.ca.gov  
Name: Nell Soto  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19069

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Email Address: Senator.Vincent@sen.ca.gov  
Name: Edward Vincent  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19040

---

Email Address: sesmond@brwncald.com  
Name: Steven E. Esmond  
Type: normal  
Subscription type: mail  
Date joined: July 30, 2002  
Lyris Member ID: 19160

---

Email Address: sfleischli@smbaykeeper.org  
Name: Steve Fleischli  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18779

---

Email Address: sgood@parks.ca.gov  
Name: Suzanne Goode  
Type: normal  
Subscription type: mail  
Date joined: August 20, 2002  
Lyris Member ID: 19381

---

Email Address: sgreen@lacs.org  
Name: Sharon Green  
Type: normal  
Subscription type: mail  
Date joined: May 23, 2002  
Lyris Member ID: 18329

---

Email Address: sgroner@lanset.com  
Name: Stephen Groner  
Type: normal  
Subscription type: mail

Date joined: April 14, 2001  
Lyris Member ID: 12747

---

Email Address: sharris@lakewoodcity.org  
Name: Lisa Ann Rapp  
Type: normal  
Subscription type: mail  
Date joined: March 26, 2002  
Lyris Member ID: 17725

---

Email Address: shelvey@whittierch.org  
Name: City of Whittier  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19018

---

Email Address: sherman.personal@mail.house.gov  
Name: Brad Sherman  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18854

---

Email Address: sherri.dugdale@mail.co.ventura.ca.us  
Name: Sherri Dugdale  
Type: normal  
Subscription type: mail  
Date joined: July 26, 2001  
Lyris Member ID: 14233

---

Email Address: sjoyce@ci.south-pasadena.ca.us  
Name: City of South Pasadena  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19003

---

Email Address: skueny@ci.moorpark.ca.us  
Name: City of Moorpark  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18958

---

Email Address: sloriso@rkacivil.com  
Name: Steve Loriso  
Type: normal  
Subscription type: mail  
Date joined: October 10, 2002  
Lyris Member ID: 19876

---

Email Address: smallon@ppco.com  
Name: Steve Mallon  
Type: normal  
Subscription type: mail

Date joined: March 18, 2002  
Lyris Member ID: 17552

---

Email Address: smarquez@toaks.org  
Name: Santos Marquez  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18795

---

Email Address: smckae@wendel.com  
Name: Stephen Mckae  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18771

---

Email Address: snasser@rb4.swrcb.ca.gov  
Name: Susana Nasserie  
Type: normal  
Subscription type: mail  
Date joined: August 16, 2000  
Lyris Member ID: 6033

---

Email Address: solis.personal@mail.house.gov  
Name: Hilda A. Solis  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19049

---

Email Address: southlandreports@earthlink.net  
Name: Bill Kelly  
Type: normal  
Subscription type: mail  
Date joined: November 22, 2002  
Lyris Member ID: 20265

---

Email Address: srubalcava@wbcounsel.com  
Name: Sharon Rubalcava  
Type: normal  
Subscription type: mail  
Date joined: February 22, 2001  
Lyris Member ID: 11670

---

Email Address: ssaneie@san.lacity.org  
Name: Shahrouzeh Saneie  
Type: normal  
Subscription type: mail  
Date joined: July 18, 2002  
Lyris Member ID: 18824

---

Email Address: stanb@dahelms.com  
Name: Stan Britt  
Type: normal  
Subscription type: mail

Date joined: June 26, 2001  
Lyris Member ID: 13798

---  
Email Address: stephen.cullen@mwhglobal.com  
Name: Dr. Stephen J. Cullen Rg  
Type: normal  
Subscription type: mail  
Date joined: August 14, 2002  
Lyris Member ID: 19316

---  
Email Address: steve.horn@mail.house.gov  
Name: Stephen Horn  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19075

---  
Email Address: steve@wspa.org  
Name: Steve Arita  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18800

---  
Email Address: Steve\_Austrheim-Smith@dot.ca.gov  
Name: Stephen Austrheim-smith  
Type: normal  
Subscription type: mail  
Date joined: March 28, 2003  
Lyris Member ID: 21857

---  
Email Address: stovermw@ix.netcom.com  
Name: Michael Stover  
Type: normal  
Subscription type: mail  
Date joined: January 09, 2002  
Lyris Member ID: 16391

---  
Email Address: summer@water.ca.gov  
Name: Summer Bundy  
Type: normal  
Subscription type: mail  
Date joined: December 13, 2000  
Lyris Member ID: 9683

---  
Email Address: susan.damron@water.ladwp.com  
Name: Susan Damron  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17546

---  
Email Address: susan.seamans@rhe.org  
Name: City of Rolling Hills Estates  
Type: normal  
Subscription type: mail

Date joined: July 23, 2002  
Lyris Member ID: 18975

---

Email Address: t.odom@lomita.com  
Name: City of Lomita  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18949

---

Email Address: tbooze@dtsc.ca.gov  
Name: Thomas F. Booze  
Type: normal  
Subscription type: mail  
Date joined: January 04, 2001  
Lyris Member ID: 10035

---

Email Address: Tcartagena@ci.walnut.ca.us  
Name: City of Walnut  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19013

---

Email Address: tduffey@coastal.ca.gov  
Name: Tracy Duffey  
Type: normal  
Subscription type: mail  
Date joined: November 02, 2001  
Lyris Member ID: 15351

---

Email Address: tgates@ci.sierra-madre.ca.us  
Name: City of Sierra Madre  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 18990

---

Email Address: tgoff@calleguas.com  
Name: Tony Goff  
Type: normal  
Subscription type: mail  
Date joined: April 18, 2001  
Lyris Member ID: 12842

---

Email Address: theorivas@aol.com  
Name: Teodoro Rivas  
Type: normal  
Subscription type: mail  
Date joined: June 02, 2002  
Lyris Member ID: 18400

---

Email Address: thomas@council.lacity.org  
Name: Mark Ridley-Thomas  
Type: normal  
Subscription type: mail



Date joined: July 24, 2002  
Lyris Member ID: 19065

---

Email Address: thughes@opw-fc.com  
Name: Tim Hughes  
Type: normal  
Subscription type: mail  
Date joined: February 27, 2001  
Lyris Member ID: 11832

---

Email Address: tim.t.strawn@exxonmobil.com  
Name: Tim Strawn  
Type: normal  
Subscription type: mail  
Date joined: August 15, 2002  
Lyris Member ID: 19323

---

Email Address: tjd@san.lacity.org  
Name: Tim De Moss  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18799

---

Email Address: tjkim@ladpw.org  
Name: Tj Kim  
Type: normal  
Subscription type: mail  
Date joined: July 28, 2002  
Lyris Member ID: 19106

---

Email Address: tjminami@san.lacity.org  
Name: Traci J. Minamide  
Type: normal  
Subscription type: mail  
Date joined: July 09, 2003  
Lyris Member ID: 23068

---

Email Address: tklinger@co.la.ca.us  
Name: Thomas Klinger  
Type: normal  
Subscription type: mail  
Date joined: March 18, 2002  
Lyris Member ID: 17538

---

Email Address: tlancaster@cstenv.com  
Name: Todd Lancaster  
Type: normal  
Subscription type: mail  
Date joined: June 09, 2003  
Lyris Member ID: 22761

---

Email Address: toms@ci.commerce.ca.us  
Name: City of Commerce  
Type: normal  
Subscription type: mail



Date joined: July 22, 2002  
Lyris Member ID: 18898

---  
Email Address: toparks@adelphia.net  
Name: Linda Parks  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19062

---  
Email Address: tpiasky@biasc.org  
Name: Tim Piasky  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18789

---  
Email Address: tterauchi@ci.gardena.ca.us  
Name: City of Gardena  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18911

---  
Email Address: urashima@earthlink.net  
Name: Mary Urashima  
Type: normal  
Subscription type: mail  
Date joined: November 29, 2000  
Lyris Member ID: 9326

---  
Email Address: vaguada@carson.ca.us  
Name: City of Carson  
Type: normal  
Subscription type: mail  
Date joined: July 22, 2002  
Lyris Member ID: 18895

---  
Email Address: vchee@ci.beverly-hills.ca.us  
Name: Vincent Chee  
Type: normal  
Subscription type: mail  
Date joined: March 19, 2002  
Lyris Member ID: 17591

---  
Email Address: vck@wishtoyo.org  
Name: Damon Wing  
Type: normal  
Subscription type: mail  
Date joined: July 17, 2002  
Lyris Member ID: 18801

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Email Address: vconway@lacsd.org  
Name: Victoria O. Conway  
Type: normal  
Subscription type: mail

Date joined: April 22, 2003  
Lyris Member ID: 22129

---

Email Address: vince\_brar@ci.cerritos.ca.us  
Name: Vince Brar  
Type: normal  
Subscription type: mail  
Date joined: October 09, 2002  
Lyris Member ID: 19842

---

Email Address: vwatt@parks.ca.gov  
Name: Valerie Watt  
Type: normal  
Subscription type: mail  
Date joined: July 20, 2001  
Lyris Member ID: 14152

---

Email Address: vyardemian@aqmd.gov  
Name: Vasken Yardemian  
Type: normal  
Subscription type: mail  
Date joined: January 25, 2002  
Lyris Member ID: 16772

---

Email Address: waters.personal@mail.house.gov  
Name: Maxine Waters  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19067

---

Email Address: waxman.personal@mail.house.gov  
Name: Henry A. Waxman  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19048

---

Email Address: wcis@chevron.com  
Name: Wayne Ishimoto  
Type: normal  
Subscription type: mail  
Date joined: December 18, 2000  
Lyris Member ID: 9756

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Email Address: websterdyw@comcast.net  
Name: Debbie Webster  
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Subscription type: mail  
Date joined: May 30, 2003  
Lyris Member ID: 22646

---

Email Address: websterdyw@msn.com  
Name: Debbie Webster  
Type: normal  
Subscription type: mail

Date joined: April 24, 2003  
Lyris Member ID: 22188

---

Email Address: weiss@council.lacity.org  
Name: Jack Weiss  
Type: normal  
Subscription type: mail  
Date joined: July 24, 2002  
Lyris Member ID: 19055

---

Email Address: wtgrandin@aol.com  
Name: Wayne Grandin  
Type: normal  
Subscription type: mail  
Date joined: October 06, 2002  
Lyris Member ID: 19799

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Email Address: zine@council.lacity.org  
Name: Dennis Zine  
Type: normal  
Subscription type: mail  
Date joined: July 23, 2002  
Lyris Member ID: 19036

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**From:** Rebecca Christmann  
**To:** Carlos Urrunaga; Joel Hanson; Theresa Rodgers  
**Date:** 7/30/2007 1:34:03 PM  
**Subject:** Lyris Posting

Theresa, Please send the following message to the long list I will bring you.

Joel, Please send this message out you the SMBRC lyris list.

Carlos, Please send this to your County Contact to send out to the cities.

Thank you,  
Rebecca

.....  
The California Regional Water Quality Control Board, Los Angeles Region has posted the Response to Comments pertaining to the Los Angeles Municipal Storm Water Permit (NPDES Permit No. CAS004001) reopener on the Regional Board website at:

<http://www.waterboards.ca.gov/losangeles/html/programs/stormwater/lams4.html>

The public hearing will be held on August 9, 2007, at the Metropolitan Water District Board Room, 700 North Alameda Street in Los Angeles.

**CC:** Michael Levy; Renee DeShazo

LYRIS MAILING

LIST NAME: 303(d)  
 DATE MAILED: 7/30/07

DATEJOINED_	EMAILADDR_	FULLNAME_
3/10/2005 10:12	DLaff@ladpw.org	Daniel J. Lafferty
4/12/2006 8:13	Elizabeth.Laskowska@lacity.org	Elizabeth Laskowska
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
11/2/2005 14:00	Gerhardt.Hubner@ventura.org	Gerhardt Hubner
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
2/28/2005 16:05	JVALENTINE@CITYOFPASADENA.NET	Jim Valentine
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
7/18/2007 14:28	Kalam.Cheung@lacity.org	Kalam Cheung
12/1/2006 11:26	Leila.Barker@lacity.org	Leila Barker
3/1/2005 11:45	MLansdell@ci.gardena.ca.us	Mitchell Lansdell
3/7/2005 14:37	MarkCapron@vrzd.com	Mark E. Capron
3/11/2005 10:39	Melinda.Talent@ventura.org	Melinda Talent
2/21/2006 13:29	MichaelM@lwa.com	Michael Marson
3/4/2005 10:47	Nancy.Settle@Ventura.Org	Nancy Settle
3/17/2005 20:27	RES00CNI@VERIZON.NET	Irma Gallegos
3/4/2005 6:57	RKUBOMO@ladpw.org	Rod Kubomoto
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
3/11/2005 8:36	Richard.Hauge@ventura.org	Richard Hauge
3/2/2005 9:47	Ronald.Sheets@OjaiSan.org	Ronald Sheets
4/11/2006 14:14	Wing.Tam@lacity.org	Wing Tam
12/13/2005 9:31	adavis@rbf.com	Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in	sam
3/1/2005 18:45	aharrington@ci.claremont.ca.us	Andrea Harrington
12/17/2005 8:28	aheil@lacsds.org	Ann Heil
7/10/2007 14:38	alice.gordon@arcadis-us.com	Alice Gordon
3/28/2005 13:31	amarsh@pirnie.com	Anita Marsh
4/19/2006 4:26	annadbrat@yahoo.com	A Bee
2/26/2007 10:31	april@fuscoe.com	April McMillian
2/28/2005 14:01	arigg@pvestates.org	Allan Rigg
12/28/2004 7:34	asaponara@treadwellrollo.com	Anthony Saponara
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9/7/2005 13:25	aubrey.baure@brooks.af.mil	Aubrey Baure
3/2/2005 13:11	barbara_klos@urscorp.com	Barbara A. Klos
3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
11/17/2005 11:20	bbax@lacsds.org	Beth Bax
3/14/2005 9:14	bcarson@toaks.org	Robert Carson
3/1/2005 14:49	biniguez@bellflower.org	Bernardo Iniguez
3/1/2005 9:59	blwilliams@ci.ventura.ca.us	Robert L. Williams
3/1/2005 11:07	bmichaelis@ci.san-dimas.ca.us	Blaine Michaelis
3/2/2005 12:01	bottorffm@verizon.net	Ron Bottorff
3/28/2005 15:13	boylehm@cdm.com	Heather Boyle
3/11/2002 0:00	bradmilner@kennedyjenks.com	Brad Milner
1/4/2005 10:00	bruce@safetygeni.com	Bruce Lokkesmoe
7/18/2006 19:43	bscheiwe@lacorps.org	Brent Scheiwe
3/16/2005 9:48	bteaford@ci.burbank.ca.us	Bonnie Teaford
9/20/2006 14:25	ca3@imsinfo.com	Cory R. Espinoza
2/28/2005 21:25	calcropdoc@yahoo.com	David Holden



3/2/2005 7:13 canderson@ci.azusa.ca.us  
5/4/2006 16:09 carla.cummings@westonsolutions.com  
1/25/2006 7:05 cathy.chang@culvercity.org  
7/20/2006 15:30 charlie.yu@lacity.org  
8/22/2006 9:49 chilgert@vtnwest.com  
9/17/2003 0:00 chuck.cleeves@hdrinc.com  
3/1/2005 7:20 cinciog@ladpw.org  
1/12/2007 8:20 cm\_consulting@comcast.net  
5/14/2007 9:46 cmattingly@ci.port-hueneme.ca.us  
8/15/2006 15:07 cmitchell@mbcnet.net  
8/1/2002 0:00 collins-6666@msn.com  
10/1/2004 13:12 courtney.morgan@hydromail.com  
2/28/2005 15:13 cperez@newhall.com  
4/5/2005 8:39 csjoberg@ladpw.org  
2/23/2006 9:23 cthrush@jacksonandperkins.com  
7/17/2006 17:05 currunaga@waterboards.ca.gov  
2/21/2006 12:34 cykhr@earthlink.net  
3/11/2005 16:06 danflorescu@caaprofessionals.com  
3/13/2007 14:10 dapt@rbf.com  
3/6/2006 10:57 darrell.siegrist@ventura.org  
1/20/2005 13:51 dave@integratedwater.com  
3/1/2005 8:57 david.thomas@ventura.org  
7/3/2002 0:00 dblankenhorn@entrix.com  
3/4/2005 14:24 dburhenn@burhenngest.com  
3/1/2005 14:22 ddavis@ci.ventura.ca.us  
2/13/2007 9:57 deana@aquabiocleanup.com  
4/21/2006 9:39 dezurawski@ucdavis.edu  
2/21/2007 15:14 dfranks@flowscience.com  
3/1/2005 10:42 dfrost@ci.camarillo.ca.us  
3/2/2005 13:42 dlippman@lvmwd.com  
3/1/2005 9:35 dliu@environcorp.com  
9/23/2005 9:12 dnarrieta@aol.com  
3/17/2006 14:34 donna.chen@lacity.org  
11/26/2003 0:00 dwebster@calrestrats.com  
2/28/2005 14:47 dwpi@chevrontexaco.com  
2/28/2005 9:05 earl.lapensee@rcslade.com  
1/5/2007 11:53 engrnish@aol.com  
9/12/2006 14:36 ewu@waterboards.ca.gov  
3/29/2005 16:00 fddryden@juno.com  
9/26/2005 23:43 fkrieger@msn.com  
3/3/2005 15:51 fleming.terrence@epa.gov  
4/16/2001 0:00 frieszbp@bv.com  
8/6/2002 0:00 gary.wortham@tetrattech.com  
11/18/2005 9:18 gerry.pepper@borax.com  
11/26/2002 0:00 ggrene@downeyca.org  
3/9/2005 10:45 ghildeb@ladpw.org  
1/22/2002 0:00 gilw@lwa.com  
10/6/2004 8:54 gogos0@bp.com  
4/1/2006 19:08 gpalhegyi@geosyntec.com  
12/22/2006 8:49 gregory.savitske@tetrattech-ffx.com  
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Carla Cummings  
Cathy Chang  
Charlie Yu  
christopher hilgert  
Chuck Cleeves  
Carrie Inciong  
Cliff Moriyama  
Carrie Mattingly  
Charles T. Mitchell  
J. Roger Collins  
Courtney Morgan  
Cris Perez  
Carl W. Sjoberg  
Christine Thrush  
Carlos Urrunaga  
Crystal Kirk  
Dan Florescu  
Daniel Apt  
Darrell Siegrist  
Dave Parkinson  
David F. Thomas  
David Blankenhorn  
Dave Burhenn  
Don Davis  
Deana Vitela  
Dale Zurawski  
Dianne Franks  
Doug Frost Jr.  
david lippman  
David Liu  
David Arrieta  
Donna Chen  
Debbie Webster  
David W. Pierce  
Earl LaPensee  
David Nishimura  
Eric Wu  
Franklin D. Dryden  
Fred Krieger  
Terrence Fleming  
Brian Friesz  
Gary Wortham  
Gerry Pepper  
Gerry Greene  
Gary Hildebrand  
Gil Wheeler  
Stefan Gogosha  
Gary Palhegyi P.E.  
Gregory Savitske  
Daniel E. Grisét  
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10/24/2005 11:59 gwlaforge@aei-casc.com	Gary W. LaForge
3/2/2005 16:00 hashimoto.janet@epa.gov	Janet Hashimoto
1/6/2006 14:08 hazem.gabr@sce.com	Hazem Gabr
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4/25/2006 14:31 hgallardy@ladpw.org	Heather Gallardy
6/22/2007 18:29 hgest@burhenngest.com	Howard Gest
7/11/2006 10:00 hmaloney@ci.monrovia.ca.us	Heather Maloney
6/11/2003 0:00 hmerenda@santa-clarita.com	Heather Merenda
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3/1/2005 15:11 jgregg@coastal.ca.gov	Jack H. Gregg
1/25/2006 7:47 jgully@lacs.d.org	Joseph R. Gully
3/1/2005 9:21 jhall@waterboards.ca.gov	Jessica Hall
3/1/2005 12:56 jharmon@weho.org	Jan Harmon
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3/2/2005 16:53 jhunter@jlha.net	John Hunter
4/24/2004 16:38 jhussain@onyxes.com	Javed Hussain
4/12/2006 14:14 jim.lamm@ballonacreek.org	Jim Lamm
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7/21/2005 9:10 jnewman@waterboards.ca.gov	Jenny Newman
6/19/2006 15:58 jodi.l.clifford@usace.army.mil	Jodi Clifford
7/17/2006 13:22 jpereira@ladpw.org	Jason Pereira
3/1/2005 15:07 jranells@ci.la-verne.ca.us	JR Ranells
3/8/2005 10:51 jreinhardt@lvmwd.com	Jeff Reinhardt
1/24/2006 16:50 jtopel@waterboards.ca.gov	Jack Topel
4/14/2005 12:52 jtruhan@mwdh2o.com	Joyce T. Clark
4/5/2007 16:20 justin@calcattlemen.org	Justin Oldfield
5/16/2005 7:40 jwoolf@rainforrent.com	Joel Woolf
3/3/2005 13:05 jyoshino@ci.walnut.ca.us	Jack Yoshino
3/1/2005 16:50 kamcdonnell@mactec.com	Kathleen McDonnell
2/28/2005 14:58 karen.turney@ch2m.com	Karen Turney
10/30/2003 0:00 kathleen.enve@verizon.net	Kathleen MCGowan
8/1/2005 11:23 kdgilbert@ucdavis.edu	Kristine Gilbert
6/15/2006 16:08 ken.franklin@lacity.org	Kenneth Franklin
7/25/2007 11:40 kevin.coyne@ventura.org	Kevin Coyne
10/23/2006 16:00 kfarfsing@cityofsignalhill.org	Kenneth C. Farfsing
3/8/2005 15:09 kharris@waterboards.ca.gov	Ken Harris
3/4/2005 10:03 kimberlycolbert@caaprofessionals.com	Kimberly Colbert
9/26/2006 23:35 kimo@pukashell.net	A. Kimo Morris Ph.D.
2/15/2006 16:17 kjames@healthebay.org	Kirsten James



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7/24/2006 11:31	kkatona@lacbos.org	Karly Katona
3/3/2005 9:18	kkeeling@bonterraconsulting.com	Kristin Keeling
2/7/2007 19:44	kmheim@ucla.edu	Karyn M. Heim
11/28/2006 13:07	koletty@usc.edu	Stephen Koletty PhD
4/28/2005 13:15	kozelka.peter@epa.gov	Peter Kozelka
2/28/2005 10:16	kris@scap1.org	Kris Whisenhunt
3/14/2007 16:53	krubin@ladwp.com	Katherine Rubin
10/11/2005 15:34	ksusilo@geosyntec.com	Ken Susilo
6/14/2006 9:30	kthompson@mail.wqa.org	Kelley Thompson
3/20/2002 0:00	kwf@san.lacity.org	Kris Flaig
12/2/2004 15:22	kwong@semprautilities.com	Karen Wong
3/1/2005 11:37	lag@sbck.org	Leigh Ann Grabowsky
3/8/2005 7:43	lance.baroldi@claytonindustries.com	Lance Baroldi
2/12/2007 10:18	laurie_solis@urscorp.com	laurie solis
9/29/2005 10:09	laustin@geosyntec.com	Lisa Austin
3/2/2005 16:36	lbehjan@simiValley.org	Laura Behjan
3/27/2007 15:01	lchipponeri@wineinstitute.org	Lucinda Chipponeri
2/13/2007 9:52	leighanner@westbasin.org	Leighanne Reeser
12/20/2006 15:37	leo@wecklabs.com	Leo Raab
1/23/2006 15:45	leoj@saic.com	Jonathan S. Leo
7/17/2002 0:00	lgallardo@waterboards.ca.gov	Laura Gallardo
9/20/2006 8:23	lhornik@torrnet.com	Loriana Hornik
11/9/2004 14:20	liyingxia@hotmail.com	sunny li
4/2/2004 13:13	llarsen@rbf.com	Laura Larsen
1/19/2005 10:42	lmartinez@biasec.org	Lisa Martinez
10/4/2006 15:48	lnye@waterboards.ca.gov	L. B. Nye
2/28/2005 11:12	lorettac@ci.irwindale.ca.us	Loretta Corpis
6/8/2005 15:05	lwarios@hotmail.com	Lisa Larios
4/14/2006 8:03	malibugrants@aol.com	Barbara A. Cameron
2/27/2002 0:00	mark.pumford@ci.oxnard.ca.us	Mark Pumford
1/18/2002 0:00	marym@water.ca.gov	Mary M. Miller
7/24/2007 9:46	masoliman@dpw.lacounty.gov	Maged Soliman
6/28/2005 16:14	masood.choudhury@verizon.com	Masood Choudhury
10/18/2005 9:54	mbaker@crglabs.com	Mark D. Baker
7/11/2006 16:12	mcohen@rwglaw.com	Matthew Cohen
5/16/2001 0:00	mel.oleson@boeing.com	Melvin Oleson
3/28/2005 15:37	mgold@healthebay.org	Mark Gold
4/2/2007 15:01	mgoode@waterboards.ca.gov	Mitchell Goode
1/14/2002 0:00	michael@hulsenv.com	J. Michael Huls Rea
3/1/2005 10:07	mike.shay@redondo.org	Michael Shay
10/19/2005 14:39	mike@wspa.org	Mike Wang
3/9/2005 21:13	mkirrene@verizon.net	Michael J. Kirrene
3/3/2005 10:09	mlcoffee@nossaman.com	Mary Lynn Coffee
7/12/2006 16:21	mlevy@waterboards.ca.gov	Michael Levy
1/25/2006 18:01	mpestrel@ladpw.org	Mark Pestrella
3/26/2007 14:40	mpeterson@kpcc.org	Molly Peterson
4/4/2007 9:11	mpf@stateside.com	Melissa Patra Farmer
1/23/2007 13:12	mpoole@nossaman.com	Melissa Poole
3/4/2005 14:59	mrnolan@socal.rr.com	Nolan Farkas
3/1/2005 9:27	msubbotin@newhall.com	Mark Subbotin
9/23/2004 12:04	mtaylor@bna.com	Matthew Taylor

11/30/2005 7:54	mtruong@ch2m.com	man truong
6/25/2007 11:55	mvoong@waterboards.ca.gov	Man Voong
11/29/2006 11:09	neal.shapiro@smgov.net	Neal Shapiro
7/23/2007 15:50	nidia@northeastrees.org	Nidia Garcia
10/25/2006 11:03	oac06_07@yahoo.com	Dillon Henry
8/18/2003 0:00	ocramer@santa-clarita.com	Oliver Cramer
6/20/2002 0:00	patrick.covert@valero.com	Patrick M. Covert
9/23/2005 9:17	paul.tantet@ventura.org	Paul Tantet
7/24/2007 16:26	penny.weiand@lacity.org	Penny Weiand
3/21/2006 13:52	peterye@chinesedaily.com	peterye
10/24/2005 11:14	pgouveia@waterboards.ca.gov	Patricia Gouveia
5/9/2006 13:52	pjenkin@sbcglobal.net	Paul Jenkin
8/16/2005 14:27	pmcgaw@archernorris.com	Peter W. McGaw
2/24/2006 12:06	powerskj@yahoo.com	Kevin Powers
3/11/2005 11:47	rbraden@sfcity.org	Robert M. Braden
1/27/2006 11:04	rchristmann@waterboards.ca.gov	Rebecca Christmann
2/20/2003 0:00	rhawkins@earthlink.net	Robert C. Hawkins
4/28/2006 8:51	richard.a.haimann@mwhglobal.com	Richard Haimann
3/1/2005 9:15	rkruger@monrovia.com	Reiner Kruger
7/17/2002 0:00	rmaestu@waterboards.ca.gov	Rafael Maestu
3/4/2005 11:50	rmontevideo@rutan.com	Richard Montevideo
3/1/2005 9:00	rnack@rbf.com	Richard Nack
9/26/2006 13:49	rnf92679@yahoo.com	Raul N. Fernandez
8/5/2002 0:00	robert_wu@dot.ca.gov	Bob Wu
3/7/2005 7:30	roger.james@worldnet.att.net	Roger B James
4/4/2005 7:39	rorton@lvmwd.com	Randal Orton
7/11/2006 15:55	rsams@waterboards.ca.gov	Robert Sams
7/12/2001 0:00	sali@waterboards.ca.gov	Syed Ali
2/28/2005 16:10	sarinamoraleschoate@santafesprings.org	Sarina Morales-Choate
4/18/2007 9:25	sbeltran@allenmatkins.com	Shanda Beltran
3/7/2005 11:28	sbroten@icfconsulting.com	Scott Broten
3/13/2005 18:15	sbrower@gsalaw.com	Sasha Brower
5/23/2002 0:00	sgreen@lacsds.org	Sharon Green
7/19/2006 17:36	shanda.beltran@lw.com	shanda beltran
3/26/2002 0:00	sharris@lakewoodcity.org	Lisa Ann Rapp
9/20/2004 19:06	shcarr@san.lacity.org	seth carr
2/28/2005 17:29	shellis@lwa.com	Shelli St.Clair
3/1/2005 15:07	skennedy@enfact.net	Sheila Kennedy
2/19/2004 12:23	slupton@winston.com	Scott Lupton
3/1/2005 11:18	smcclary@ci.fillmore.ca.us	Steve McClary
3/28/2005 15:36	smith.davidw@epa.gov	David W. Smith
7/1/2004 11:44	snasserie@waterboards.ca.gov	Susana Nasserie
2/28/2005 10:33	spaulsen@flowscience.com	Susan C. Paulsen Ph.D. P.E.
6/6/2005 15:06	spomrehn@lakewoodcity.org	Scott Pomrehn
11/19/2004 10:52	srojas@newhall.com	Sam Rojas
7/18/2002 0:00	ssaneie@san.lacity.org	Shahrouzeh Saneie
4/12/2007 11:02	sschaless@ladpw.org	T Scott Schales
3/7/2005 8:36	steve.granade@navy.mil	Steve Granade
3/3/2005 13:11	stuber.robyn@epa.gov	Robyn A. Stuber
8/9/2004 15:51	sturney@ci.arcadia.ca.us	Susannah Turney
3/2/2005 9:44	susanstark10@sbcglobal.net	Susan Stark
6/29/2006 13:31	suzanne@lasgrwc.org	Suzanne Dallman

1/6/2005 15:15 tbilezikjian@rbf.com  
3/18/2002 0:00 tklinger@co.la.ca.us  
8/27/2004 16:17 tlange@santa-clarita.com  
4/12/2006 12:46 tmoorhouse@cleanlake.com  
3/3/2005 13:22 tnanson@simivalley.org  
3/2/2005 11:01 toleary@longbeach.gov  
8/26/2004 12:56 trodgers@waterboards.ca.gov  
3/3/2005 9:08 tsmith@bonterraconsulting.com  
3/24/2005 14:57 ummorow127@yahoo.com  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
4/22/2003 0:00 vconway@lacsds.org  
2/15/2007 11:03 vhevener@lynwood.ca.us  
7/20/2001 0:00 vwatt@parks.ca.gov  
10/11/2006 14:13 wbotha@daley-heft.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
3/1/2005 9:35 winter@theriverproject.org  
10/6/2002 0:00 wtgrandin@aol.com  
3/22/2005 10:27 ysim@ladpw.org  
7/11/2006 7:25 zora.baharians@lacity.org

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Thomas Klinger  
Travis Lange  
Thomas Moorhouse  
Tim Nanson  
Tom Leary  
Theresa Rodgers  
Thomas E Smith Jr  
Andrew Amorao  
Vanessa Tubaces  
Victoria O. Conway  
Vanessa Hevener  
Valerie Watt  
Wentzelee Botha  
William Funderburk  
Melanie Winter  
Wayne Grandin  
Sim, Youn  
Zora Baharians

LYRIS MAILING

LIST NAME: Marinas Boating, and Fishing  
 DATE MAILED: 7/30/07

DATEJOINED_	EMAILADDR_	FULLNAME_
3/2/2005 9:56	Citymanager@hiddenhillscity.org	Cherie L. Paglia
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
11/2/2005 14:00	Gerhardt.Hubner@ventura.org	Gerhardt Hubner
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
12/30/2004 1:29	Joemamabush@netzero.com	Joe Bell
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
7/18/2007 14:29	Kalam.Cheung@lacity.org	Kalam Cheung
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
2/22/2005 9:27	aahlering@ladpw.org	Andrew Ahlering
12/13/2005 9:31	adavis@rbf.com	Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in	sam
1/3/2001 0:00	aharrington@ci.claremont.ca.us	Andrea Harrington
10/1/2001 0:00	ahunter@sanpedro.com	Alan Hunter
9/8/2005 10:08	allen.camp@sfcoc.com	Allen F. Camp
12/28/2004 7:34	asaponara@treadwellrollo.com	Anthony Saponara
11/15/2005 12:22	ashlic@lwa.com	Ashli Desai
3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
9/24/2005 15:30	belascodave@sbcglobal.net	David Belasco
3/1/2005 9:59	blwilliams@ci.ventura.ca.us	Robert L. Williams
7/18/2006 19:43	bscheiwe@lacorps.org	Brent Scheiwe
9/20/2006 14:25	ca3@imsinfo.com	Cory R. Espinoza
3/2/2005 7:13	canderson@ci.azusa.ca.us	Chet F. Anderson
1/11/2001 0:00	cardoza_angel@yahoo.com	Angel Cardoza Jr.
5/4/2006 16:09	carla.cummings@westonsolutions.com	Carla Cummings
1/25/2006 7:05	cathy.chang@culvercity.org	Cathy Chang
7/20/2006 15:30	charlie.yu@lacity.org	Charlie Yu
7/15/2005 17:52	chris@nautilusenvironmental.com	Chris Stransky
2/28/2005 13:13	cleanwater@sfo.com	Daniel Cooper
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11/16/2006 14:00	garypoe@windowsonourwaters.org	Gary Poe
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10/24/2005 11:59	gwlaforge@aei-casc.com	Gary W. LaForge
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6/22/2007 18:29	hgest@burhenngest.com	Howard Gest
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Theresa Rodgers  
Thomas Sullivan  
Victoria O. Conway  
David DuVarney  
Wentzelee Botha  
Wayne Ishimoto  
Marcia Hanscom  
Youn Sim  
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10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
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5/30/2006 10:34	ghaseg3112@aol.com	Glen Hasegawa
3/9/2005 10:45	ghildeb@ladpw.org	Gary Hildebrand
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12/22/2006 8:49	gregory.savitske@tetrattech-ffx.com	Gregory Savitske
1/16/2007 8:05	gvillarreal@rbf.com	Gian Villarreal
10/24/2005 11:59	gwlaforge@aei-casc.com	Gary W. LaForge
3/2/2005 16:00	hashimoto.janet@epa.gov	Janet Hashimoto
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1/25/2006 7:47	kgully@lacs.org	Joseph R. Gully
3/1/2005 9:21	jhall@waterboards.ca.gov	Jessica Hall
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7/21/2005 9:10	jnewman@waterboards.ca.gov	Jenny Newman
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1/6/2005 15:15	tbilezikjian@rbf.com	Tanya Bilezikjian
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10/11/2006 14:13	wbotha@daley-heft.com	Wentzelee Botha
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10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
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7/18/2007 14:29	Kalam.Cheung@lacity.org	Kalam Cheung
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3/4/2005 6:57	RKUBOMO@ladpw.org	Rod Kubomoto
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
10/3/2006 11:17	Vernon@polb.com	James Vernon
4/11/2006 14:14	Wing.Tam@lacity.org	Wing Tam
12/13/2005 9:31	adavis@rbf.com	Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in	sam
1/3/2001 0:00	aharrington@ci.claremont.ca.us	Andrea Harrington
12/17/2005 8:28	aheil@lacs.org	Ann Heil
3/28/2005 13:31	amarsh@pirnie.com	Anita Marsh
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10/3/2006 11:16	arms@polb.com	Matt Arms
12/28/2004 7:34	asaponara@treadwellrollo.com	Anthony Saponara
11/15/2005 12:22	ashlic@lwa.com	Ashli Desai
3/2/2005 13:11	barbara_klos@urscorp.com	Barbara A. Klos
3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
11/17/2005 11:20	bbax@lacs.org	Beth Bax
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10/3/2006 11:15	cammc@jlha.net	Cameron McCullough
5/4/2006 16:09	carla.cummings@westonsolutions.com	Carla Cummings
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3/10/2005 10:12	DLaff@ladpw.org	Daniel J. Lafferty
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4/12/2006 8:13	Elizabeth.Laskowska@lacity.org	Elizabeth Laskowska
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
10/26/2000 0:00	JHunter@JLHA.Net	John Hunter
2/28/2005 16:05	JVALENTINE@CITYOFPASADENA.NET	Jim Valentine
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9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
12/1/2006 11:26	Leila.Barker@lacity.org	Leila Barker
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3/4/2005 6:57	RKUBOMO@ladpw.org	Rod Kubomoto
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
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4/19/2007 9:52	kward@waterboards.ca.gov	Kim Ward
3/18/2002 0:00	kweston@converseconsultants.com	Ken Weston
3/20/2002 0:00	kwf@san.lacity.org	Kris Flaig
2/12/2007 10:18	laurie_solis@urscorp.com	laurie solis
9/29/2005 10:09	laustin@geosyntec.com	Lisa Austin

12/20/2006 15:37	leo@wecklabs.com	Leo Raab
4/4/2007 10:09	lgilbane@csulb.edu	Lisa Gilbane
9/20/2006 8:23	lhornik@torrnet.com	Loriana Hornik
12/19/2006 11:27	lisa.carlson@lacity.org	Lisa Carlson
2/7/2001 0:00	lisa.williams@lsa-assoc.com	Lisa Williams
3/24/2004 11:19	llarsen@rbf.com	Laura Larsen
1/19/2005 10:42	lmartinez@biasc.org	Lisa Martinez
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12/12/2006 5:56	lokun@waterboards.ca.gov	Lori Okun
2/28/2005 11:12	lorettac@ci.irwindale.ca.us	Loretta Corpis
6/8/2005 15:05	lwarios@hotmail.com	Lisa Larios
3/17/2005 14:19	mariki@ladpw.org	Menerva Ariki
1/18/2002 0:00	marym@water.ca.gov	Mary M. Miller
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3/2/2005 14:40	matt_lyons@lbwater.org	Matt Lyons
10/18/2005 9:54	mbaker@crglabs.com	Mark D. Baker
7/11/2006 16:12	mcohen@rwglaw.com	Matthew Cohen
3/18/2002 0:00	mgagan@rosekindel.com	Michael S. Gagan
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10/19/2005 14:39	mike@wspa.org	Mike Wang
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1/25/2006 18:01	mpestrel@ladpw.org	Mark Pestrella
3/26/2007 14:40	mpeterson@kpcc.org	Molly Peterson
4/4/2007 9:11	mpf@stateside.com	Melissa Patra Farmer
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6/25/2001 0:00	mw@winefieldassoc.com	Matt Winefield
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7/25/2006 15:49 scain@waterboards.ca.gov  
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1/3/2006 11:39 sewers@dslextreme.com  
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2/28/2005 17:29 shellis@lwa.com  
3/1/2005 15:07 skennedy@enfact.net  
2/19/2004 12:23 slupton@winston.com  
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2/28/2005 10:33 spaulsen@flowscience.com  
6/6/2005 15:06 spomrehn@lakewoodcity.org  
4/12/2007 11:02 sschales@ladpw.org  
1/9/2002 0:00 stovermw@ix.netcom.com  
8/9/2004 15:51 sturney@ci.arcadia.ca.us  
3/2/2005 9:44 susanstark10@sbcglobal.net  
6/29/2006 13:34 suzanne@lasgrwc.org  
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3/6/2007 8:05 tfung@dot.ca.gov  
3/2/2005 11:01 toleary@longbeach.gov  
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3/3/2005 9:08 tsmith@bonterraconsulting.com  
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2/15/2007 11:03 vhevener@lynwood.ca.us  
10/19/2005 14:45 vndesai@san.lacity.org  
10/11/2006 14:13 wbotha@daley-heft.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
3/1/2005 9:35 winter@theriverproject.org  
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T Scott Schales  
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Susannah Turney  
Susan Stark  
Suzanne Dallman  
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Tom Fung  
Tom Leary  
Theresa Rodgers  
Thomas E Smith Jr  
Vanessa Tubaces  
Victoria O. Conway  
Vanessa Hevener  
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Melanie Winter  
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2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
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9/23/2005 9:17	paul.tantet@ventura.org	Paul Tantet
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2/24/2006 12:06	powerskj@yahoo.com	Kevin Powers
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3/10/2005 11:15 scottquady@vrsd.com  
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4/11/2006 17:56 snissman@lacbos.org  
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Shelli St.Clair  
David W. Smith  
Susana Nasserie  
Susan Nissman  
Susan C. Paulsen Ph.D. P.E.  
T Scott Schales  
Susan Stark  
Tanya Bilezikjian  
Tom Fung  
Thomas Moorhouse  
Tim Nanson  
Theresa Rodgers  
Thomas E Smith Jr  
Vanessa Tubaces  
Victoria O. Conway  
David DuVarney  
Wentzelee Botha  
William Funderburk  
Sim, Youn  
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2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
7/18/2007 14:29	Kalam.Cheung@lacity.org	Kalam Cheung
9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
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3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
3/28/2005 15:13	boylehm@cdm.com	Heather Boyle
3/2/2005 20:04	brader@popsound.com	Brian Rader
3/16/2005 9:48	bteaford@ci.burbank.ca.us	Bonnie Teaford
9/20/2006 14:25	ca3@imsinfo.com	Cory R. Espinoza
5/4/2006 16:09	carla.cummings@westonsolutions.com	Carla Cummings
1/25/2006 7:05	cathy.chang@culvercity.org	Cathy Chang
7/20/2006 15:30	charlie.yu@lacity.org	Charlie Yu
3/1/2005 7:20	cinciong@ladpw.org	Carrie Inciong
5/30/2006 12:12	clayton.yoshida@ladwp.com	Clayton Yoshida
2/28/2005 13:13	cleanwater@sfo.com	Daniel Cooper
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6/1/2006 8:25	csaylan@earthlink.net	charles saylan
4/5/2005 8:39	csjoberg@ladpw.org	Carl W. Sjoberg
7/17/2006 17:05	currunaga@waterboards.ca.gov	Carlos Urrunaga
3/11/2005 16:06	danflorescu@caaprofessionals.com	Dan Florescu
3/13/2007 14:10	dapt@rbf.com	Daniel Apt
1/20/2005 13:51	dave@integratedwater.com	Dave Parkinson
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9/12/2006 14:36	ewu@waterboards.ca.gov	Eric Wu
4/5/2005 9:52	fchin@ladpw.org	Frank Chin
3/3/2005 15:51	fleming.terrence@epa.gov	Terrence Fleming
8/6/2002 0:00	gary.wortham@tetrattech.com	Gary Wortham
10/5/2006 10:00	ggreene@downeyca.org	Gerald Greene
10/12/2005 15:50	gmarsh@waterboards.ca.gov	Glenda Marsh
12/22/2006 8:49	gregory.savitske@tetrattech-ffx.com	Gregory Savitske
10/9/2002 0:00	griset@scag.ca.gov	Daniel E. Griset
1/16/2007 8:05	gvillarreal@rbf.com	Gian Villarreal
10/24/2005 11:59	gwlaforge@aei-casc.com	Gary W. LaForge
3/2/2005 16:00	hashimoto.janet@epa.gov	Janet Hashimoto
4/25/2006 14:31	hgallardy@ladpw.org	Heather Gallardy
6/22/2007 18:29	hgest@burhenngest.com	Howard Gest
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3/16/2005 9:48	bteaford@ci.burbank.ca.us	Bonnie Teaford
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5/30/2006 12:12	clayton.yoshida@ladwp.com	Clayton Yoshida
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1/20/2005 13:51	dave@integratedwater.com	Dave Parkinson
2/19/2004 14:05	dbechtold@targheeinc.com	Debra Bechtold
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2/28/2005 9:05	earl.lapensee@rcslade.com	Earl LaPensee
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3/7/2005 7:30 roger.james@worldnet.att.net	Roger B James
2/28/2005 12:43 rreinhard@mofo.com	Robert Reinhard
7/11/2006 15:55 rsams@waterboards.ca.gov	Robert Sams
3/16/2002 0:00 rstewart3@earthlink.net	Peggy Stewart
2/16/2006 15:25 ruby.maldonado@rdmd.ocgov.com	Ruby Maldonado
5/30/2007 21:16 saeedtabatabaeepour@yahoo.com	Saeed Tabatabaeepour
2/28/2005 16:10 sarinamoraleschoate@santafesprings.org	Sarina Morales-Choate
3/7/2005 11:28 sbrotten@icfconsulting.com	Scott Broten
2/16/2006 15:26 scott.jakubowski@rdmd.ocgov.com	Scott D. Jakubowski
2/16/2006 15:22 scrumby@ci.seal-beach.ca.us	Sean Crumby
5/23/2002 0:00 sgreen@lacsds.org	Sharon Green
3/26/2002 0:00 sharris@lakewoodcity.org	Lisa Ann Rapp
2/28/2005 17:29 shellis@lwa.com	Shelli St.Clair
10/10/2002 0:00 sloriso@rkacivil.com	Steve Loriso
2/19/2004 12:23 slupton@winston.com	Scott Lupton
3/28/2005 15:36 smith.davidw@epa.gov	David W. Smith
2/3/2004 16:07 smonk@cdpr.ca.gov	Steven Monk
10/5/2000 0:00 snasserie@waterboards.ca.gov	Susana Nasserie
2/28/2005 10:33 spaulsen@flowscience.com	Susan C. Paulsen Ph.D. P.E.
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2/14/2006 15:56 steven.maghy@aes.com  
1/9/2002 0:00 stovermw@ix.netcom.com  
6/15/2006 12:07 sunil@gswater.com  
2/14/2006 15:57 susan.damron@ladwp.com  
3/2/2005 9:44 susanstark10@sbcglobal.net  
6/29/2006 13:34 suzanne@lasgrwc.org  
2/10/2005 13:59 tbell@bgsgroup.net  
1/6/2005 15:15 tbilezikjian@rbf.com  
3/6/2007 8:05 tfung@dot.ca.gov  
3/2/2005 11:01 toleary@longbeach.gov  
10/5/2000 0:00 trodgers@waterboards.ca.gov  
3/3/2005 9:08 tsmith@bonterraconsulting.com  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
4/22/2003 0:00 vconway@lacs.d.org  
10/11/2006 14:13 wbotha@daley-heft.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
10/6/2002 0:00 wtgrandin@aol.com  
4/4/2006 16:22 ysim@ladpw.org  
5/16/2005 8:12 zbaharia@san.lacity.org  
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Suzanne Dallman  
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Tom Fung  
Tom Leary  
Theresa Rodgers  
Thomas E Smith Jr  
Vanessa Tubaces  
Victoria O. Conway  
Wentzelee Botha  
William Funderburk  
Wayne Grandin  
Youn Sim  
Zora Bahariance  
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6/8/2006 15:40	Gail.Robinson@ventura.org	Gail Robinson
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
11/2/2005 14:00	Gerhardt.Hubner@ventura.org	Gerhardt Hubner
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
7/18/2007 14:29	Kalam.Cheung@lacity.org	Kalam Cheung
3/7/2005 14:37	MarkCapron@vrsd.com	Mark E. Capron
6/15/2006 8:34	Martin.Hernandez@ventura.org	Martin Hernandez
3/11/2005 10:39	Melinda.Talent@ventura.org	Melinda Talent
3/4/2005 10:47	Nancy.Settle@Ventura.Org	Nancy Settle
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3/11/2005 8:36	Richard.Hauge@ventura.org	Richard Hauge
2/28/2005 13:12	WJPRanch@aol.com	Bob Pinkerton
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2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
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3/14/2005 9:14	bcarson@toaks.org	Robert Carson
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3/2/2005 12:01	bottorffm@verizon.net	Ron Bottorff
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2/28/2005 13:13	cleanwater@sfo.com	Daniel Cooper
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12/1/2005 15:43	patrick.kelley@farmcreditwest.com	Patrick J. Kelley
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4/28/2006 10:26	pvcwd.agwater@verizon.net	Michael Miller
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1/27/2006 11:04	rchristmann@waterboards.ca.gov	Rebecca Christmann
6/20/2007 10:56	rhorton@nossaman.com	Robert Horton
4/28/2006 8:51	richard.a.haimann@mwhglobal.com	Richard Haimann



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2/28/2005 12:43	rreinhard@mofa.com	Robert Reinhard
7/11/2006 15:55	rsams@waterboards.ca.gov	Robert Sams
11/14/2005 15:41	rveiga@waterboards.ca.gov	rebecca veiga nascimento
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3/13/2005 18:15	sbrower@gsalaw.com	Sasha Brower
3/10/2005 11:15	scottquady@vrsd.com	Scott Quady
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1/6/2005 15:15	tbilezikjian@rbf.com	Tanya Bilezikjian
3/6/2007 8:05	tfung@dot.ca.gov	Tom Fung
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2/28/2005 12:53	trak@trakenviro.com	Bradford S. Newman
10/5/2000 0:00	trodgers@waterboards.ca.gov	Theresa Rodgers
3/3/2005 9:08	tsmith@bonterraconsulting.com	Thomas E Smith Jr
3/24/2005 14:57	ummorow127@yahoo.com	Andrew Amorao
3/11/2005 12:43	vanessatubaces@caaprofessionals.com	Vanessa Tubaces
4/22/2003 0:00	vconway@lacsds.org	Victoria O. Conway
10/26/2005 11:04	vlhaller@aol.com	Verne Haller
7/20/2001 0:00	vwatt@parks.ca.gov	Valerie Watt
3/1/2005 14:31	wbobbkiewicz@ci.santa-paula.ca.us	Wally Bobkiewicz
10/11/2006 14:13	wbotha@daley-heft.com	Wentzelee Botha
11/18/2005 5:14	wfunderburk@sfcfirm.com	William Funderburk
5/4/2006 16:20	ychu@waterboards.ca.gov	Yanchi Chu
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2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
7/18/2007 14:29	Kalam.Cheung@lacity.org	Kalam Cheung
9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
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10/12/2005 15:50	gmarsh@waterboards.ca.gov	Glenda Marsh
12/22/2006 8:49	gregory.savitske@tetrattech-ffx.com	Gregory Savitske
10/9/2002 0:00	griset@scag.ca.gov	Daniel E. Griset
1/16/2007 8:05	gvillarreal@rbf.com	Gian Villarreal
10/24/2005 11:59	gwlaforge@aei-casc.com	Gary W. LaForge
3/2/2005 16:00	hashimoto.janet@epa.gov	Janet Hashimoto
4/25/2006 14:31	hgallardy@ladpw.org	Heather Gallardy
6/22/2007 18:29	hgest@burhenngest.com	Howard Gest
11/17/2005 11:07	houstgrp@pacbell.net	Laura Cottrell
2/3/2003 0:00	howard@fuscoe.com	Howard Wen
11/4/2005 12:06	info@smcca.org	George Wolfberg
3/1/2005 14:16	jbeller@san.lacity.org	Jeffrey Beller
4/15/2003 0:00	jcolston@ocsd.com	James Colston
5/9/2006 12:33	jcox@waterboards.ca.gov	Joanne Cox
3/3/2005 11:08	jcruz@ladpw.org	Jemellee Cruz
4/13/2007 16:56	jfordyce@waterboards.ca.gov	Jennifer Fordyce
3/1/2005 14:53	ygibson@torrnet.com	Jeffery W. Gibson
1/25/2006 7:47	ygully@lacs.org	Joseph R. Gully
3/2/2005 16:53	yhunter@jlha.net	John Hunter
4/24/2004 16:38	jhussain@onyxes.com	Javed Hussain
7/13/2005 13:28	jjensen@waterboards.ca.gov	Joanna Jensen
3/1/2005 10:55	jkelly@toaks.org	JoAnne Kelly
4/14/2003 0:00	jmiller3@ch2m.com	Judi Miller
12/19/2006 13:38	jmorton@igc.org	Jess Morton
7/21/2005 9:10	jnewman@waterboards.ca.gov	Jenny Newman
12/19/2006 10:07	jpereira@dpw.lacounty.gov	Jason Pereira

7/17/2006 13:22	jpereira@ladpw.org	Jason Pereira
1/24/2006 16:50	jtopel@waterboards.ca.gov	Jack Topel
4/5/2007 16:20	justin@calcattlemen.org	Justin Oldfield
3/1/2005 16:51	kamcdonnell@mactec.com	Kathleen McDonnell
10/30/2003 0:00	kathleen.enve@verizon.net	Kathleen McGowan
6/15/2006 16:08	ken.franklin@lacity.org	Kenneth Franklin
7/25/2007 11:40	kevin.coyne@ventura.org	Kevin Coyne
10/23/2006 16:00	kfarfsing@cityofsignalhill.org	Kenneth C. Farfsing
3/8/2005 15:09	kharris@waterboards.ca.gov	Ken Harris
3/4/2005 10:03	kimberlycolbert@caaprofessionals.com	Kimberly Colbert
2/15/2006 16:17	kjames@healthebay.org	Kirsten James
6/22/2004 12:29	kjones@dot.ca.gov	Keith Jones
3/3/2005 9:18	kkeeling@bonterraconsulting.com	Kristin Keeling
11/28/2006 13:07	koletty@usc.edu	Stephen Koletty PhD
4/28/2005 13:15	kozelka.peter@epa.gov	Peter Kozelka
3/14/2007 16:53	krubin@ladwp.com	Katherine Rubin
10/11/2005 15:34	ksusilo@geosyntec.com	Ken Susilo
5/22/2006 12:45	kthompson@mail.wqa.org	Kelley Thompson
4/19/2007 9:52	kward@waterboards.ca.gov	Kim Ward
3/20/2002 0:00	kwf@san.lacity.org	Kris Flaig
2/12/2007 10:18	laurie_solis@urscorp.com	laurie solis
9/29/2005 10:09	laustin@geosyntec.com	Lisa Austin
3/3/2005 17:10	lcessna@torrnet.com	Linda Cessna
2/13/2007 9:52	leighanner@westbasin.org	Leighanne Reeser
12/20/2006 15:37	leo@wecklabs.com	Leo Raab
9/20/2006 8:24	lhornik@torrnet.com	Loriana Hornik
12/19/2006 13:40	lisa.carlson@lacity.org	Lisa Carlson
2/7/2001 0:00	lisa.williams@lsa-assoc.com	Lisa Williams
4/2/2004 13:13	llarsen@rbf.com	Laura Larsen
1/19/2005 10:42	lmartinez@biasec.org	Lisa Martinez
10/4/2006 15:48	lnye@waterboards.ca.gov	L. B. Nye
2/28/2005 11:12	lorettac@ci.irwindale.ca.us	Loretta Corpis
6/27/2005 14:56	louise.rishoff@asm.ca.gov	Louise Rishoff
4/14/2006 8:03	malibugrants@aol.com	Barbara A. Cameron
3/17/2005 14:19	mariki@ladpw.org	Menerva Ariki
3/1/2005 9:12	mark.davis@ventura.org	Mark Davis
1/18/2002 0:00	marym@water.ca.gov	Mary M. Miller
7/24/2007 9:46	masoliman@dpw.lacounty.gov	Maged Soliman
10/18/2005 9:54	mbaker@crglabs.com	Mark D. Baker
1/4/2006 11:50	mbearzi@earthlink.net	Dr. Maddalena Bearzi
7/11/2006 16:13	mcohen@rwglaw.com	Matthew Cohen
3/28/2005 15:37	mgold@healthebay.org	Mark Gold
3/1/2005 10:07	mike.shay@redondo.org	Michael Shay
10/19/2005 14:39	mike@wspa.org	Mike Wang
3/9/2005 21:13	mkirrene@verizon.net	Michael J. Kirrene
3/3/2005 10:09	mlcoffee@nossaman.com	Mary Lynn Coffee
7/12/2006 16:22	mlevy@waterboards.ca.gov	Michael Levy
1/25/2006 18:01	mpestrel@ladpw.org	Mark Pestrella
3/26/2007 14:40	mpeterson@kpcc.org	Molly Peterson
4/4/2007 9:11	mpf@stateside.com	Melissa Patra Farmer
3/4/2005 14:59	mrnolan@socal.rr.com	Nolan Farkas
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11/29/2006 11:09 neal.shapiro@smgov.net  
7/20/2006 11:29 nstevens@ladpw.org  
10/25/2006 11:03 oac06\_07@yahoo.com  
4/18/2007 11:41 ogalang@dpw.lacounty.gov  
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12/19/2006 10:10 peggy.nguyen@lacity.org  
7/24/2007 16:26 penny.weiland@lacity.org  
10/24/2005 11:14 pgouveia@waterboards.ca.gov  
8/16/2005 14:27 pmcgaw@archernorris.com  
2/24/2006 12:06 powerskj@yahoo.com  
1/27/2006 11:04 rchristmann@waterboards.ca.gov  
3/27/2001 0:00 rdeshazo@waterboards.ca.gov  
3/5/2001 0:00 reproger@aol.com  
9/23/2005 9:31 rez1@earthlink.net  
4/28/2006 8:51 richard.a.haimann@mwhglobal.com  
5/10/2007 10:06 rob.osborne@redondo.org  
8/15/2002 0:00 robert\_wu@dot.ca.gov  
3/7/2005 7:30 roger.james@worldnet.att.net  
1/26/2006 7:28 rorton@lvmwd.com  
2/28/2005 12:43 rreinhard@mofo.com  
7/11/2006 15:55 rsams@waterboards.ca.gov  
4/24/2003 0:00 schroederdj@cdm.com  
1/3/2006 11:39 sewers@dslextreme.com  
8/9/2005 19:51 sgreen@lacsds.org  
7/19/2006 17:36 shanda.beltran@lw.com  
9/20/2004 19:06 shcarr@san.lacity.org  
2/28/2005 17:29 shellis@lwa.com  
3/1/2005 15:07 skennedy@enfact.net  
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10/5/2000 0:00 snasserie@waterboards.ca.gov  
4/11/2006 17:56 snissman@lacbos.org  
2/28/2005 10:33 spaulsen@flowscience.com  
4/12/2007 11:02 sschales@ladpw.org  
3/2/2005 9:44 susanstark10@sbcglobal.net  
11/6/2006 10:42 swalther@lacsds.org  
1/6/2005 15:15 tbilezikjian@rbf.com  
3/6/2007 8:05 tfung@dot.ca.gov  
7/1/2004 11:31 trodgers@waterboards.ca.gov  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
4/22/2003 0:00 vconway@lacsds.org  
10/11/2006 14:13 wbotha@daley-heft.com  
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Peter W. McGaw  
Kevin Powers  
Rebecca Christmann  
Renee Deshazo  
J. Roger Collins  
David Reznick  
Richard Haimann  
Rob Osborne  
Bob Wu  
Roger B James  
Dr. Randal Orton  
Robert Reinhard  
Robert Sams  
Donald Schroeder  
Anna Sklar  
Sharon N. Green  
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Shelli St.Clair  
Sheila Kennedy  
David W. Smith  
Susana Nasserie  
Susan Nissman  
Susan C. Paulsen Ph.D. P.E.  
T Scott Schales  
Susan Stark  
Shelly Walther  
Tanya Bilezikjian  
Tom Fung  
Theresa Rodgers  
Vanessa Tubaces  
Victoria O. Conway  
Wentzelee Botha  
William Funderburk  
Youn Sim  
Zora Baharians

**RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT  
(NPDES NO. CAS004001)**

**Table 1. List of commenters submitting written comments before the close of the public comment period.**

Letter Number	Commentor	Date Received
1	Donald L. Wolfe, County of Los Angeles Department of Public Works	June 25, 2007
2	Tracy Egoscue, Santa Monica Baykeeper and Mark Gold, Heal the Bay	June 25, 2007

Note: The letter number above corresponds to the first number in the Comment Number field in Table 2.

**Table 2. Responsiveness summary for written comments submitted before the close of the public comment period.**

COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION	
1.1	The County is committed to meeting water quality standards for bacteria in Marina del Rey Harbor (MDRH). Since adoption of the MDR Bacteria TMDL in 2003, the County has funded or participated in various studies and projects in excess of \$4.5 million.	The Regional Board acknowledges the actions taken to date by the County of Los Angeles to improve water quality and achieve water quality standards in MDRH. Staff notes, however, that approximately \$2.2 million of the \$4.5 million spent on studies and projects were not County monies, but funds awarded to the County from various grant programs. Additionally, staff notes the extensive litigation the County has mounted to challenge the storm water permit during the last six years, all of which has taken County and State resources away from efforts to improve water quality and attain water quality standards.  Additionally, irrespective of the efforts undertaken to date, exceedances of water quality standards continue in Marina del Rey Harbor and at Mothers' Beach. Since April 1, 2007, there have been 12 exceedance days of water quality standards at Mothers' Beach and Basins D, E and F within MDRH. These exceedances result in significant costs to the MDR communities in terms of lost tourism and related revenues, lost recreational opportunities, and illnesses incurred by the public due to poor water quality in MDRH and at Mother's Beach.		NO
1.2	The MS4 Permit should be amended to incorporate BMPs from the MDRH implementation plan and monitoring to determine if compliance is being achieved, not numeric limits. This approach would be consistent with USEPA's guidance on the incorporation of TMDLs into storm water permits. On November 22, 2002, USEPA issued a memorandum that rejected	This comment is the same as Comment 1.1.2 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.	NO	

F I N I S H



RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
	<p>placing numeric limits based on TMDLs in storm water permits, recognizing that numeric limits are neither feasible nor appropriate given the variability of storm water runoff and the current lack of knowledge as to sources of pollutants and effective treatment for those pollutants.</p>	<p>The USEPA memorandum referenced is not a policy, but a "non-binding" "guidance" memorandum containing general recommendations that may or may not be applicable to a given TMDL. It notes that "there may be other approaches that would be appropriate in particular situations," and that USEPA would make each permitting decision on a case-by-case basis considering the particular circumstances of each. (See USEPA November 22, 2002 Memorandum at pages 5-6.) Furthermore, the proposed permit amendment is not contrary to the recommendations in the memorandum. The memorandum's recommendations relate specifically to municipal "storm water" discharges. Specifically, the memorandum states that EPA recognizes that "storm water discharges are due to storm events that are highly variable in frequency and duration and are not easily characterized," and therefore numeric effluent limits may be infeasible or inappropriate. The provisions of this amendment, however, do not relate to storm events, and in fact, storm events are specifically excluded from these provisions. This reopener only relates to dry weather discharges, which are by definition not storm discharges, but rather days with less than 0.1 inch of rain. Such non storm water discharges are primarily nuisance flows, such as watering lawns, washing cars, and other incidental and nominal discharges of urban living that flow into the storm drains. The provisions are included as receiving water limitations because the TMDL's waste load allocations are expressed as 'exceedance days' in the water body, i.e., receiving water limitations.</p>	<p>The MS4 permit is abundantly clear that unauthorized non storm water discharges to the MS4 system are prohibited. Similar prohibitions were contained in the 1990 and 1996 LA MS4 permits. Prohibiting non-storm water discharges from the MS4, which cause exceedances of bacteria standards is the intent of the TMDL, and consistent with the permit. It is the same approach taken to incorporate the analogous</p>

RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.3	<p>Inclusion of numeric limits is also directly contrary to the recommendations of the panel of experts convened by the State Water Resources Control Board. In its report, The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water associated with Municipal, Industrial and Construction Activities (June 2006), the panel specifically concluded that it is not feasible at this time to set enforceable numeric effluent criteria for municipal BMPs and in particular urban discharges. The panel reaches this conclusion because of the difficulty in determining the specific causative agents or the level of control needed to address a specific beneficial use impairment in a receiving water, and because no protocol exists that enables an engineer to design with certainty a BMP that will produce the desired result.</p>	<p>provisions of the Santa Monica Bay Beaches Bacteria (SMBBB) TMDL into the MS4 Permit in September 2006.</p> <p>Furthermore, in the case of the MDRH Bacteria TMDL, the watershed is 2.9 square-miles; responsible agencies have undertaken a study to identify the sources of bacteria (Mother's Beach and Back Basins Bacteria TMDL Non-Point Source Study, February 2007); and there is ample knowledge regarding effective treatment of bacteria. These circumstances lend credence on scientific and technical grounds to incorporating numeric receiving water limits into the permit for dry weather discharges from the MS4 to MDRH and Mother's Beach.</p>	NO
	<p>The panel neither deliberated nor made any determination on how non-storm water discharges from MS4s that adversely affect receiving waters are to be addressed in storm water permits. Further, the proposed limits are receiving water limitations, not effluent limitations. While the State Water Board has convened workshops to discuss the panel's report, the State Board has not yet taken any action on the report. To reiterate, this panel's report does not address non-storm water discharges from point sources like the MS4. This proposed action deals with non-storm water discharges.</p>	<p>This comment is similar to Comment 11.4 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p>	
	<p>In addition, nothing in the record supports the claim that complying with the permit provisions that implement the dry weather WLAs would be infeasible or inappropriate. In fact,</p>		

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RESPONSE TO COMMENTS ON THE PROPOSED REOPENER OF THE COUNTY OF LOS ANGELES  
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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.4	<p>The Regional Board should not incorporate numeric bacteria limits into the Permit while the issue is being examined of whether fecal bacteria from non-point sources accurately indicate the presence of human pathogens.</p> <p>A recent study found no correlation between the risk of illness from waterborne pathogens and fecal indicators (total coliforms, fecal coliforms and enterococcus) at a beach where non point sources were the dominant fecal source. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg 2005), Recreational Water Contact and Illness in Mission Bay, California, Southern California Coastal Water Research Project, Technical Report 449.</p>	<p>the County of Los Angeles is in the process of complying with the provisions. The County has already completed two out of three low-flow diversion projects, with the third scheduled for completion in 2008. The Mothers' Beach Water Quality Circulation Project was completed in October 2006. Additional programs continue to be implemented, while existing programs are continually evaluated to assess effectiveness. See also response to Comment 1.2.</p> <p>This comment is the same as Comment 11.5 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p> <p>It is well documented that discharges from storm drains during dry and wet weather carry significant loads of bacteria to the shoreline in southern California. Noble et al. found that freshwater outlets, which included storm drains, failed to meet bacterial indicator standards in almost 60% of the samples, the worst of all of the strata evaluated in the regional shoreline monitoring program. Most of the standard failures near freshwater outlets were for multiple indicators and occurred repetitively throughout the five-week summer study period. (Noble, Rachel T., Dorsey, J., Leecaster, M., Mazur, M., McGee, C., Moore, D., Victoria, O., Reid, D., Schiff, K., Vainik P., Weisberg, S. 1999. Southern California Bight 1998 Regional Monitoring Program, Vol. 1: Summer shoreline microbiology. Southern California Coastal Water Research Project, Westminster, CA.)</p> <p>It has also been documented that storm drains discharging to the shoreline of Santa Monica Bay contain human pathogens. Noble et al., cited above, showed through molecular tests the presence of human enteric virus genetic</p>	NO

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		<p>material in 7 of the 15 freshwater outlets, with 73% of these detections coinciding with levels of fecal coliforms that exceeded bacterial indicator thresholds.</p> <p>Furthermore, it was well documented in a landmark epidemiological study at Santa Monica Bay beaches that there are significantly increased health risks from swimming and otherwise engaging in water recreation in the ocean in the vicinity of flowing storm drains (Haile, R.W., Alamillo, J., Barret, K., Cressey, R., Dermont, J., Ervin, C., Glasser, A., Harawa, N., Harmon, P., Harper, J., McGee, C., Millikan, R.C., Nides, M., Witte, J.S. 1996. An epidemiological study of possible adverse health effects of swimming in Santa Monica Bay, Santa Monica Bay Restoration Project; Haile, R.W., Witte, J.S., Gold, M., Cressey, R., McGee, C., Millikan, R.C., Glasser, A., Harawa, N., Ervin, C., Harmon, P., Harper, J., Dermont, J., Alamillo, J., Barret, K., Nides, M., Wang, G. 1999. The health effects of swimming in ocean water contaminated by storm drain runoff. Epidemiology 10(4):355-363.). While there may be unknowns regarding the myriad sources of bacteria within a watershed, in light of these scientific findings, it is appropriate that the Regional Board not wait to regulate these discharges given that the health of thousands of beachgoers is at stake.</p> <p>While the integrity of the bacteria water quality standards is not presently before the Regional Board, the evidence submitted by the County does not overvill the volumes of extensive data to the contrary. The Mission Bay Study was conducted after an extensive amount of work was done to identify and eliminate all anthropogenic sources of bacteria to Mission Bay; this is not the case with the MDRH. In addition, the Study cautioned against extrapolating its findings beyond the study area.</p>	

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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.5	Incorporating numeric limits into the permit could result in the division of resources that could otherwise be devoted to permit programs and compliance with the TMDL. If a citizen lawsuit were to be filed against any of the responsible jurisdictions, including the County, significant funds and employee resources of that agency would have to be diverted from permit and TMDL programs to address that lawsuit. The proposed amendment, to the extent it imposes requirements not subject to the iterative process, invites those lawsuits.	<p>These facts were already established by regulation when the TMDL was adopted. And the County's contentions in this regard were also rejected by the Regional Board in September 2006 when the SMBBB TMDL was incorporated into the MS4 permit.</p> <p>It is not appropriate to establish an iterative approach to regulate non-storm water, point source discharges. The iterative approach was designed as a component of MEP compliance, and MEP is directed to storm water discharges, not non-stormwater. In any event, compliance with the iterative process is not a safe harbor from citizen's suits, and therefore an iterative approach as opposed to that proposed provides no greater protection from such lawsuits.</p> <p>Furthermore, given the lack of reported compliance with the iterative approach over the last six years, and the lack of evidence of myriads of citizens suits having been filed (very few such suits have ever been filed to enforce the storm water permit), this claim has no practical basis. The County has neither explained nor submitted evidence to support how these permit provisions would themselves stimulate more lawsuits.</p> <p>Under either an iterative approach, or under the proposed receiving water limitations approach, the County is required to attain the WLAs. Only failing to attain the WLAs gives rise to citizens' suits. The County has proffered no evidence that the cost of actually attaining the WLAs would be different under an iterative approach. Failing to comply with the permit provisions, including the WLAs, is an appropriate basis for a citizens' suit.</p> <p>This comment essentially reflects the County's desire that it does not wish to be subject to enforcement for failing to comply with the permit conditions. Nevertheless, section 505 of the Clean Water Act, creating a citizen's right of action to enforce the Act's provisions, is the national policy</p>	NO

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1.6	The amendment's proposed language is ambiguous. The Regional Board should insert the word 'non storm water' in proposed Part 1.B and Part 2.6.	<p>Even if preventing the County from being subjected to citizens' suits, as opposed to ensuring compliance with water quality standards, was a proper basis upon which to determine permit limits, the County has proffered no evidence to support its claim. The County has submitted no budget set aside to defend against spurious or even legitimate citizens suits. The County has submitted no explanation as to why these provisions would spur inappropriate citizens' suits. The County has submitted no estimate or evidence to support an estimate, of how much money such litigation might cost. The County has submitted no explanation or supportive evidence of how those moneys would affect the County's storm water compliance budget. Nor has the County submitted evidence that it is unable to obtain funding for such litigation without harming its compliance efforts. In fact the County has spent significant moneys during the last six years to litigate the LA County MS4 Permit. Finally, the County has submitted no evidence to rebut the presumption inherent in citizens' suits provisions of the CWA, that private enforcement will promote compliance with the Act.</p> <p>Finally, with respect to the alleged diversion of resources, staff are sensitive to the claim, given the vast resources the Regional Board, State Board, and the Attorney General's Office has been forced to expend to defend against the permittees', including the County's, wholly unsuccessful challenge to this permit over the last six years, up to the California Supreme Court.</p> <p>established by Congress, and it is not incumbent on the Regional Board to endeavor to circumvent that policy.</p>	NO
	This comment is the same as Comment 1.B.15 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated		



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COMMENT NUMBER	SUMMARY OF COMMENT	RESPONSE	REVISION
1.7	The proposed Part 2.6 should be renumbered as Part 2.3 and made a part of the iterative process. Part 2.3 of the MS4 Permit currently sets forth the iterative process to reach water quality objectives. This is the process recommended by EPA and ordered by the State Water Resources Control Board. See State Board Order WQ 99-05.	without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.  The current wording in Part 1.B and Part 2.6, which refers to 'Summer Dry Weather' is consistent with the regulatory language of the TMDL. The term 'summer dry weather' is clearly defined in the TMDL and in Part 5. DEFINITIONS of the MS4 Permit starting on page 57. It would be redundant to insert the word 'non storm water'.  This comment is the same as Comment 1.B.9 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.  The USEPA's Wet Weather TMDL Policy and State Board WQO 99-05 discuss the use of an iterative approach to controlling pollutants in storm water discharges. For non-storm water discharges from MS4s that cause or contribute to exceedances of a water quality standard, the appropriate response is to prohibit the discharges or require compliance with the water quality standards.  The key reasons for not employing an iterative approach to implement the MDRH Bacteria Summer Dry Weather WLAs are: (1) The WLAs do not regulate the discharge of storm water; and (2) The harm to the public from violating the WLAs is dramatic both in terms of health impacts to exposed beachgoers, and the economic cost to the region associated with related illnesses.	NO
1.8	The Regional Board is without authority to reopen the Permit and amend it because the Permit has expired and a new permit application has been submitted.	As the County notes, "the terms and conditions" of the permit have been administratively extended. Those terms and conditions include the reopeners.	NO

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	<p>Instead the Regional Board must address any modification through issuance of a new permit.</p> <p>23 Cal. Code Reg. Section 2235.4 provides that the terms and conditions of an expired permit are automatically continued pending issuance of a new permit if all requirements of the Federal NPDES regulations on continuation of expired permits are complied with.</p> <p>40 C.F.R. Section 122.62(a) provides that permits may be modified only during their terms. Although the Permit's provisions remain in effect during the current application process pursuant to 23 Cal. Code Reg. Section 2235.4 and 40 C.F.R. Section 122.6, nothing in either of these sections allows modification as opposed to issuance of a new permit.</p>	<p>No authority stands for the proposition that an administratively extended permit cannot be reopened. The two regulations cited by the County are not on point. 23 Cal. Code Regs 2235.4 merely recites that permits are administratively extended until they are reissued, and that a permittee is required to continue abiding by the terms of the existing permit when a new permit has not yet been issued. These provisions recognize the fact that often resource constraints prevent the Regional Board from reissuing permits immediately upon expiration. That is the case with the Los Angeles MS4 permit.</p> <p>Presently, the Regional Board's storm water staff's primary attention is directed to reissuance of the Ventura County MS4 permit. The Regional Board's approach to storm water regulation is generally intended to be relatively consistent across the region. Regional Board staff are working diligently with the Ventura County stakeholders to adopt an MS4 permit that is effective, enforceable, and feasible, while ensuring attainment of water quality standards. Staff does not believe it prudent to duplicate the efforts, by having two identical process run simultaneously (in Ventura and Los Angeles County), and in any event, the Regional Board lacks the staff to undertake such an effort without dramatically delaying the reissuance of both permits. Staff anticipates that many of the stakeholder concerns can be addressed in Ventura before a draft LA MS4 permit is issued, thus minimizing the ultimate time needed to readopt the LA MS4 permit. Staff expects that the Ventura MS4 permit will be presented to the Regional Board for adoption in the Fall of 2007. After that permit is adopted, the LA MS4 reissuance process will commence.</p>	<p>Nevertheless, the Marina Del Rey Harbor TMDL, like the SMBBB TMDL, both regulations adopted by the Regional</p>



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		<p>Board, require compliance with certain of their provisions prior to the time that the LA MS4 permit can be reissued. The only way to ensure compliance is to incorporate the relevant provisions into the MS4 permit. Moreover, federal regulations require that NPDES permits incorporate the terms and conditions of TMDL waste load allocations. While reissuing the permit would be preferable, timely doing so is not feasible. Accordingly, reopening the permit is the only option that would timely implement federal regulations, and the Regional Board's regulations (the TMDLs).</p> <p>The County also cites to 40 C.F.R. Section 126.62(a)(3), which does not exist. Presumably the County intended to reference 122.62, which discusses the circumstances under which a permit may be reopened. The referenced subdivision ((a)(3)) includes the phrase "Permits may be modified during their terms for this cause only as follows". The County construes the words "during their terms" as imposing a limitation upon the ability to reopen a permit.</p> <p>Notably, the permit contains a specific reopener to incorporate modifications to the basin plan. Since the proposed modification is based upon a reopener provided in the permit, either subdivision (a)(7) or (a)(3) could provide authority for the modification, and subdivision (a)(7) does not include the phrase "during their terms". Nevertheless, the permit's reopener does use the phrase "during its term".</p> <p>The County interprets the words "during its term" to infer a prohibition on reopening the permit "after its term". That interpretation is not tenable for a variety of reasons. First, staff notes that the purpose of the limits on an agency's ability to modify a permit "during its term" is to provide the permittee a five-year safe harbor such that, except in certain identified circumstances, the permittee has assurances that</p>	

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		<p>during the five-year life of the permit, efforts undertaken to comply with the permit will be reasonably likely to be all that are required of the permittee. To fulfill the purposes of the Clean Water Act, however, the regulations authorize an agency to modify a permit at an interim time if certain circumstances, applicable here, exist. These include implementing newly adopted basin plan provisions (including TMDLs). But, the purpose of the safe harbor has already been achieved during any period of administrative extension. The permittee has already had the benefit of the five year limitation.</p> <p>Second, the County's interpretation would violate public policy, as it would effectively strip a permit's reopener, and thus the Regional Board's ability to update a permit to implement new regulations, until such time as the Regional Board can adopt a new permit. That would render many discharges beyond the Regional Board's jurisdiction for what may be, depending upon the permit at issue, several years "after its term". That is not consistent with the intent of the legislature in enacting the Clean Water Act. Nowhere is there support for the contention that the public must suffer a public health risk penalty during administrative extension.</p> <p>Third, grammatically, the County's interpretation does not follow. The words "during their terms" are not words of limitation; the limitations in the subdivision are "may be modified ... only as follows". If anything, the words "during their terms" limit the restrictions on modifying the permit. In other words, the plain meaning of the regulation only effects a limitation upon what the Regional Board may do during the term of the permit. The regulation does not address the post-term circumstances. That makes sense. After five years a new permit may be issued that includes any provisions as are appropriate. Thus, focusing on the phrase "during its term" as the County has done compels the</p>	

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1.9	There is no lawful basis for making one permittee responsible for another permittee's compliance.	<p>Staff does not believe that interpretation would be consistent with the intent of the Clean Water Act, either. Staff believes the better interpretation is that "the terms and conditions of the permit" are administratively extended, including the reopeners and limits on reopening the permit. Thus, to the extent the terms of a permit are administratively extended, so too is the term of the permit. Thus the terms of the limits on reopeners apply during administrative extension, as they would during the ordinary term.</p> <p>Reopening the permit at this time is wholly appropriate given that compliance with the summer dry weather provisions of the TMDL is required by March 18, 2007. All co-permittees under the LA County MS4 Permit have been on notice since 2001 that the staff report/fact sheet of the Los Angeles County MS4 permit anticipated the incorporation of TMDLs. Additionally, the implementation provisions of the TMDL state that the regulatory mechanism for implementing the TMDL will be through the MS4 Permit (Basin Plan Table 7-5.1). Moreover, the permit modifications do not impose requirements on any new agencies, but only makes requirements that are already applicable to some of the permittees for Santa Monica Bay Beaches' discharges, equally applicable to those agencies' discharges to Marina Del Rey Harbor.</p>	NO
	This comment is the same as Comment 1.B.11 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.		

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1.10	<p>The Permit's provisions must be supported by adequate findings. Water Code Sections 13263 and 13377; Code of Civil Procedure Section 1094.5. The proposed amendment does not meet this requirement. To include the proposed amendment in the Permit, the Regional Board must first make the following findings to support the amendment:</p> <ol style="list-style-type: none"> <li>1. A finding identifying the sources of the bacteria at issue.</li> <li>2. A finding that it is technically feasible to comply with the terms of this amendment.</li> <li>3. A finding that the terms of the amendment can be met through cost-effective programs that will be accepted by the public.</li> <li>4. A finding that the amendment will not require the permittees to adopt controls or implement programs that go beyond the maximum extent practicable standard applicable to municipal storm water permits, 33 U.S.C. Section 1342(p)(3)(B)(iii) in order to comply with the amend.</li> <li>5. A finding that the terms of the amendment are reasonably achievable.</li> <li>6. A finding that the Regional Board has considered all factors set forth in the Water Code Section 13241, including (a) the environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto, (b) water quality</li> </ol>	<p>The provision is derived directly from the TMDL, which was not challenged. The permittees are jointly responsible because they are discharging to and from a joint system. There are several safe harbors articulated in the fact sheet that would obviate liability by a particular jurisdiction. Moreover, nothing would prevent a permittee within a relevant subwatershed from seeking indemnity from another permittee in the same manner as joint tortfeasors, to the extent the permittee has not actually caused the violation.</p> <p>This comment is the same as Comment 11.12 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006. The comment is simply reiterated without any showing by the County to explain how the staff response provided during the previous proceeding was insufficient.</p> <p>The permit provisions do contain adequate findings, and the provisions of the authorities cited by the commenter have been complied with. The findings requested by the commenter are not necessary. The findings proposed by the County are not required to support an amendment to the permit to implement the State and federally approved TMDL that assigned the waste load allocations to these permittees. This permit modification specifically incorporates those waste load allocations, in the manner specified by the TMDL, to the permittees within the Marina del Rey Watershed.</p> <p>1) No authority is cited for the proposition that the Regional Board must identify sources of bacteria that may cause exceedances before incorporating conditions in NPDES permits to require permittees to prevent the discharge of bacteria in amounts that violate standards. Nevertheless, a source analysis is already set forth in the TMDL regulation at Basin Plan Chapter 7-5.</p>	NO



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	<p>conditions that could reasonably be achieved through the coordinated control of all facts which affect water quality in the areas, and (c) economic considerations.</p> <p>7. A finding that the amendment is reasonable in light of the Water Code Section 13241 facts.</p>	<p>2) The feasibility of the terms of the amendment is not before the Regional Board at this time. The waste load allocations were already established in a prior regulation, and federal regulations require that they be incorporated into the relevant NPDES permits. Those regulations, however, were adopted in contemplation of the fact that they are technically feasible. The MDRH jurisdictions indicated their intent to comply by diverting dry weather discharges to sanitary sewers, two out of three diversions have already occurred.</p> <p>3-5) Both the Defenders of Wildlife decision and the Rancho Cucamonga decision affirm the Regional Board's authority to require strict compliance with water quality standards, including for discharges of storm water from MS4s. The unauthorized non-storm water discharges are subject to the prohibitions contained in Parts 1 and 2.1. The MEP standard is applicable only to discharges of storm water not to non-storm water discharges. The proposed prohibition is applicable to non-storm water discharges.</p> <p>6-7) The reopener will implement a federally mandated and approved TMDL into a federal NPDES permit, consistent with all federal requirements. Neither the LA/Burbank decision, nor any other authority requires an economic analysis under such circumstances. As noted in the LA/Burbank decision, NPDES permits must implement water quality standards irrespective of cost considerations. This action does not exceed the federal standard which is abundantly clear that the discharge of unauthorized non-storm water flows containing pollutants causing or contributing to violation of WQS or WQOs is prohibited.</p> <p>The permit contains discharge prohibitions language and receiving water limitations language that prohibit any discharges that cause or contribute to violation of WQS or WQOs, See Part 1 and 2.1.</p>	

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1.11	<p>Pursuant to the notice of hearing, the County requests that the following studies, memorandum and documents in the Regional Board's files be brought to the hearing and included in the administrative record:</p> <ol style="list-style-type: none"> <li>1. The Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial Total Maximum Daily Load Dry- and Wet-Weather Implementation Plan.</li> <li>2. Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.</li> <li>3. The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities (State Water Resources Control Board Panel of Experts, June 2006).</li> <li>4. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg (2005), Recreational Water Contact and Illness in Mission Bay, California; Southern California Coastal Water Research Project, Technical Report 449.</li> <li>5. Lee, C. M., T. Lin, C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006) Sediments as a Reservoir for Fecal Indicators Bacteria at Three Santa Monica Bay Beaches; Water Research. In press.</li> <li>6. Noble, R. T., Griffith, J. F., Blackwood, A. D., Fuhrman, J. A. Gregory, J. B. Hernandez, X., Liang, X., Bera, A. A., and Schiff, K., Multiered Approach Using Quantitative PCR to Track Sources of Fecal Pollution Affecting Santa Monica Bay, California. Applied and Environmental Microbiology (February 2006).</li> <li>7. EPA memorandum, dated November 22, 2002, entitled, Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAS) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs.</li> <li>8. Letter dated May 31, 2007, from the Santa Monica BayKeeper and NRDC to the County of Los Angeles</li> </ol>	<p>The following items enumerated in the County's letter are already part of the administrative record and will be brought to the hearing per your request: 1, 2, 3, 7.</p> <p>Items 4, 5, 6, and 9 are not part of the Administrative Record for this proposed action; the County has not submitted these documents to staff. The County had the opportunity to submit evidence for the consideration of the Board by June 25, 2007, and did not timely do so. Nevertheless, the County has been invited to provide an offer of proof as to their contents, establish the documents' relevance, and demonstrate good cause for late inclusion.</p> <p>Item 8 is a 60-day notice of intent to sue the County of Los Angeles and the City of Malibu for violations of the storm water permit. Regional Board staff believes the document has no relevance to this proceeding. The fact that on one occasion NRDC et al may be exercising its rights to file a citizen's suit does not have a bearing upon whether the MDRH TMDL should be incorporated into the MS4 in the same manner as the SMBBB TMDL. Nevertheless, the County has been invited to submit an offer of proof as described above. See also response to Comment 1.5.</p>	NO

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1.12	<p>The Regional Board should defer consideration of the proposed amendment at this time. Moreover, any amendment should incorporate an iterative, BMP-based approach to achieve the desired water quality goals.</p> <p>9. Ishii, S., Hansen, D. L. Hicks, R. E., Sadowsky, M. J., Beach Sand and Sediments are Temporal Sinks and Sources of Echerichia Coli in Lake Superior Environ. Sci. Technology, 41 (7). Web Release Date: March 1, 2007.</p>	<p>This comment is similar to Comment 11.23 the County made during the proceeding to incorporate the SMBBB TMDL summer dry weather WLAs into the MS4 permit in September of 2006.</p> <p>No compelling reason has been set forth to delay consideration of the proposed amendment. Awaiting the Permit's renewal would be inconsistent with the terms of the TMDL, which requires compliance with dry weather WLAs by March 18, 2007. Furthermore, 40 CFR section 122.44(d) requires that NPDES permits be consistent with the assumptions and requirements of any available waste load allocation. The regulatory provisions of the TMDL state that the primary mechanism for implementing the TMDL will be through the MS4 Permits (Basin Plan Chapter 7-5). Failing to incorporate the waste load allocation into the permit would be contrary to federal regulations. See also response to Comment 1.7.</p>	NO
2.1	<p>This reopener is consistent with the September 14, 2006 amendment of the LA County MS4 NPDES Permit which incorporated the Santa Monica Bay Beaches Bacteria TMDL WLAs for summer dry weather. Although Marina del Rey Watershed is a subwatershed of the Santa Monica Bay Watershed, this reopener is required because there are separate summer dry weather Bacteria TMDLs for each. Santa Monica Baykeeper and Heal the Bay support the</p>	<p>Comment noted.</p>	NO

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2.2	<p>proposed LA MS4 reopener to incorporate the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL WLAs for summer dry weather.</p> <p>All monitored locations in MDR must meet state beach bacteria health standards 100% of the time during summer dry weather from April 1 to October 31. Data collected since April 1, 2007 show at least 10 exceedance days of the MDR Bacteria TMDL requirements from summer dry weather. Seven of these exceedance days were at Mothers Beach, a beach frequented by families.</p>	<p>On April 26, 2007, a section 13225 and 13267 enforcement letter was sent by the Executive Officer to the jurisdictional group requiring the submittal of information regarding the exceedances at Mothers' Beach; the response is currently under review.</p>	NO

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