



LA PERMIT GROUP

For more information please contact:
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Who are we?

The Los Angeles Permit Group is a consortium of 62 municipalities (see attached list) that was formed to ensure Los Angeles' stormwater is managed properly, both for flood control and water quality protection. The Group's genesis was in 2007 starting with the Los Angeles Stormwater Quality Partnership, when 8 cities representing areas throughout Los Angeles County decided to partner to find opportunities to collaborate with other municipalities and the Los Angeles Regional Water Quality Control Board. This partnership expanded in 2011 to form the LA Permit Group. Since then, the LA Permit Group's participation has grown to its current 62 voting agencies; each voting agency will be a permittee under the new National Pollutant Discharge Elimination System (NPDES) Permit. Several other stakeholders participate in or provide input to the LA Permit Group, including other municipalities, environmental organizations, elected officials and water agencies.

Why was the LA Permit Group formed?

Municipalities in Los Angeles County must, as required under the federal Clean Water Act, obtain a National Pollutant Discharge Elimination System Permit (NPDES Permit) for urban runoff from the municipality's drainage system. The NPDES Permit is issued by the Los Angeles Regional Water Quality Control Board and identifies conditions and requirements that the municipalities must comply with in order to protect the area's water resources (including beaches, lakes and streams). Meeting these permit requirements has proved to be a daunting task for municipalities, both from a technical and a financial standpoint. The LA Permit Group was formed, therefore, to accomplish several important objectives, including:

- Promoting constructive collaboration and problem-solving between the regulated community (municipalities) and the Los Angeles Regional Water Quality Control Board (LARWQCB)
- Assisting in development of a new NPDES Permit that is capable of integrating the protection of water quality with other watershed objectives in a cost-effective and science-based manner
- Focusing limited municipal resources on implementation of water quality protection activities that are efficient, effective and sustainable

What are the challenges to achieving these objectives?

Ubiquitous Sources and Cost-Prohibitive Traditional Solutions: The Clean Water Act requires that storm drain system owners/operators obtain a NPDES Permit as these systems can discharge to waters of the United States. Under a NPDES Permit, it is the municipality's responsibility to control pollution so that it does not degrade the quality of these waters. This is challenging for municipalities because pollutants come from millions of sources, including residents, businesses, automobiles and virtually all human activities in an urban area. Controlling these sources is a massive undertaking that requires significant financial commitment of limited public funds that is currently well beyond the ability of most municipalities to support.

Complex Ecology: While the goal to protect a water body's ecological health may be determined by regulation, it is often not known what it will take to achieve the goal. Despite years of study, experimentation and pilot projects, it is clear that additional studies, monitoring and data analyses may be necessary to find the right combination of programs and practices that can achieve water quality goals. In some cases, the solution to pollutant reduction is source control or the identification of a legacy pollutant. Even more challenging is trying to find the most cost-effective solutions. An integrated iterative approach is needed to provide the data and studies necessary to identify the right combination to achieve the water quality goals. In addition to efforts implemented by municipalities, coordination with non-profits, community groups and other regulatory agencies will be required to develop and implement the work necessary to meet the water quality goals.

Best Solutions May Not Be in Permittees' Control: There are many examples of effective and cost-efficient solutions that involve preventing water quality pollution in the first place, rather than trying to remove or treat the pollution after it enters the stormwater system. Recently passed legislation, which will eliminate most of the copper contained in automobile brake pads, will singlehandedly do more, and at significantly less cost, to meet water quality standards for copper than massive amounts of treatment systems. However, these superior solutions are often not within the control of municipalities to implement, requiring legislation or action by other entities.

Stormwater Cannot Be Managed for a Single Objective: When the stormdrain system was built, it was constructed with the purpose of flood prevention. However, the unintended consequence of this system is that it carries pollutants to waters of the United States. In some cases, the solutions that are best for water quality are also effective for flood control, but in other cases, they compete. Furthermore, in drought-prone southern California, stormwater is also being closely looked at for its water supply potential. Add to this, the habitat and recreational opportunities that can be created or impacted by stormwater, and it is easy to see how challenging it is to manage these various objectives.

New Permit Will Be Significantly More Complex: Under the current permit, there are only two Total Maximum Daily Loads (TMDLs) which must be met. TMDLs are the maximum amount of pollutants the water body can handle in relation to its dependent ecosystem and the designated beneficial uses (e.g. recreational, commercial fishing, wildlife habitat, etc.) TMDLs are established for water bodies that are designated as impaired for the particular pollutant, as documented in the LARWQCB's Basin Plan. Under the new Permit being developed, the number of TMDLs that must be complied with is expected to increase to 32 - many of these have multiple pollutants associated with them (see attached list)! This means that managing and monitoring stormwater will require new approaches and strategies for the new Permit to be feasible. It also means that the LARWQCB and the permittees need to engage in constructive dialogue about practical and economical ways to achieve the desired water quality results.

The LA Permit Group's Commitment

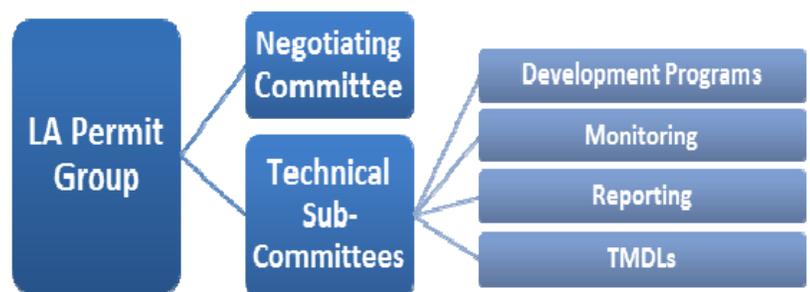
For these and many other reasons, regulating stormwater quality is difficult for both the LARWQCB and the municipalities subject to its permitting. Water quality is also of great concern to many other stakeholders who are involved in stormwater Permit development, including nature conservancies, environmental groups, businesses, residents and the elected officials who must figure out how to fund stormwater compliance programs while still providing vital local services. Based on these challenges, the LA Permit Group has committed itself to the following:

- We will organize ourselves so that our proposed solutions and approaches are clear, focused and well thought out
- We will advocate use of the best science available to guide the expenditure of public funds for the most cost-effective water quality results
- We will work constructively with the LARWQCB and any other willing stakeholders to develop the best NPDES Permit possible

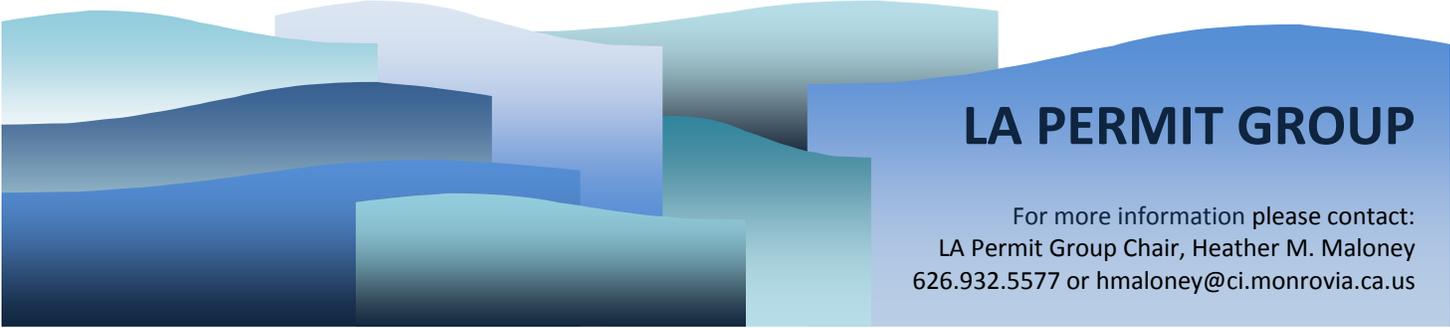
The LA Permit Group believes strongly that by organizing the NPDES permittees into a cohesive group, that a better Permit will be the result. The LARWQCB benefits by receiving coherent and consistent input that has been thoroughly vetted by the permittees. The region and its residents benefit by focusing limited public funds on achieving the best water quality results possible. The environment benefits by focusing on developing a permit based on the best science and best practices available.

How is the LA Permit Group organized?

The LA Permit Group has established technical working groups to address the key areas listed below. Each of the Technical sub-committees provides recommendations to the LA Permit Group. The role of the Negotiating Committee (which includes members from all major watersheds in the Los Angeles region) is to coordinate discussions among permittees, the LARWQCB, and other stakeholders and to represent the Group's consensus.



- Development Programs — addresses development planning (new and redevelopment), grading and construction site practices and post-construction stormwater run-off water quality standards.
- Total Maximum Daily Loads (TMDLs) — addresses how the Total Maximum Daily Load requirements will be incorporated into the NPDES Permit. The TMDL group is developing recommendations to advocate cost-effective TMDL implementation strategies with reasonable compliance schedules.
- Monitoring — addresses the various monitoring programs in the Permit and TMDLs. The Monitoring group is analyzing the Permit and TMDL compliance activities, as well as other NPDES Permits throughout the State of California, and recommended an integrated, watershed based monitoring program.
- Reporting — addresses the reporting format in order to streamline and reduce administrative time compiling the Annual Report and TMDL compliance reports. In addition, the Reporting Group is responsible for analyzing the non-stormwater discharges, minimum control measures and economics of the Permit.



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Voting Agencies

Agoura Hills	Lakewood
Alhambra	Lawndale
Arcadia	Los Angeles
Artesia	Lynnwood
Azusa	Malibu
Baldwin Park	Manhattan Beach
Bell	Monrovia
Bell Gardens	Montebello
Bellflower	Monterey Park
Beverly Hills	Paramount
Bradbury	Pasadena
Burbank	Pico Rivera
Calabasas	Pomona
Carson	Redondo Beach
Claremont	Rolling Hills
Commerce	Rolling Hills Estates
Covina	Rosemead
Culver City	San Dimas
Diamond Bar	San Gabriel
Duarte	San Marino
El Monte	Santa Clarita
Gardena	Santa Fe Springs
Glendale	Santa Monica
Glendora	Sierra Madre
Hawthorne	South El Monte
Hermosa Beach	South Gate
Hidden Hills	Torrance
Huntington Park	Vernon
Industry	West Covina
Inglewood	West Hollywood
La Verne	Westlake Village

TOTAL MAXIMUM DAILY LOADS (TMDL) BY WATERSHED MANAGEMENT AREA (WMA)

- A. Santa Clara River Watershed Management Area
 - 1. Santa Clara River Nitrogen Compounds TMDL
 - 2. Upper Santa Clara River Chloride TMDL
 - 3. Lake Elizabeth, Munz Lake, and Lake Hughes Trash TMDL (*Lake Elizabeth only*)
 - 4. Santa Clara River Estuary and Reaches 3, 5, 6, and 7 Indicator Bacteria TMDL

- B. Santa Monica Bay Watershed Management Area
 - 1. Santa Monica Bay Beaches Bacteria TMDL
 - 2. Santa Monica Bay Nearshore and Offshore Debris TMDL
 - 3. Santa Monica Bay TMDL for DDTs and PCBs (*USEPA established*)

 - 4. Malibu Creek Subwatershed
 - a. Malibu Creek and Lagoon Bacteria TMDL
 - b. Malibu Creek Watershed Trash TMDL
 - c. Malibu Creek Watershed Nutrients TMDL (*USEPA established*)

 - 5. Ballona Creek Subwatershed
 - a. Ballona Creek Trash TMDL
 - b. Ballona Creek Estuary Toxic Pollutants TMDL
 - c. Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL
 - d. Ballona Creek Metals TMDL
 - e. Ballona Creek Wetlands TMDL for Sediment and Invasive Exotic Vegetation (*USEPA established*)

 - 6. Marina del Rey Subwatershed
 - a. Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL
 - b. Marina del Rey Harbor Toxic Pollutants TMDL

- C. Dominguez Channel and Greater Harbors Waters Watershed Management Area
 - 1. Los Angeles Harbor Bacteria TMDL (Inner Cabrillo Beach and Main Ship Channel)
 - 2. Machado Lake Trash TMDL
 - 3. Machado Lake Nutrient TMDL
 - 4. Machado Lake Pesticides and PCBs TMDL
 - 5. Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL

- D. Los Angeles River Watershed Management Area
 - 1. Los Angeles River Watershed Trash TMDL
 - 2. Los Angeles River Nitrogen Compounds and Related Effects TMDL
 - 3. Los Angeles River and Tributaries Metals TMDL
 - 4. Los Angeles River Watershed Bacteria TMDL
 - 5. Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL (*USEPA established*)
 - 6. Los Angeles Area Lakes TMDLs¹ (*USEPA established for Lake Calabasas, Echo Park Lake, and Peck Road Park Lake*)

¹ Los Angeles Area Lakes TMDL includes multiple watershed management areas.

LA County MS4 Permit – List of TMDLs by Watershed Management Area

- E. San Gabriel River Watershed Management Area
 - 1. San Gabriel River and Impaired Tributaries Metals and Selenium TMDL (*USEPA established*)
 - 2. Legg Lake Trash TMDL
 - 3. Los Angeles Area Lakes TMDLs¹ (*USEPA established for Legg Lake and Puddingstone Reservoir*)

- F. Los Cerritos Channel and Alamitos Bay Watershed Management Area
 - 1. Los Cerritos Channel Metals TMDL (*USEPA established*)
 - 2. Colorado Lagoon OC Pesticides, PCBs, Sediment Toxicity, PAHs, and Metals TMDL

- G. Middle Santa Ana River Watershed Management Area (Santa Ana Region TMDL)
 - 1. Middle Santa Ana River Watershed Bacteria Indicator TMDL

¹ Los Angeles Area Lakes TMDL includes multiple watershed management areas.