

## Los Angeles Regional Water Quality Control Board

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### VIA EMAIL ONLY

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**IN RE PETITIONS CHALLENGING 2012 LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (ORDER NO. R4-2012-0175): LOS ANGELES WATER BOARD COMMENTS ON RECEIVING WATER LIMITATIONS QUESTIONS  
SWRCB/OCC FILES A-2236(a) THROUGH (kk)**

Dear Ms. Wadhvani:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) is hereby providing comments in response to the two questions posed in the State Water Resources Control Board's (State Water Board) July 8, 2013 letter regarding the Los Angeles Water Board's compliance alternative to the receiving water limitations (RWLs) contained in Order No. R4-2012-0175, *Waste Discharge Requirements for MS4 Discharges within the Coastal Watersheds of Los Angeles County, Except those Discharges Originating From the City of Long Beach MS4* (Los Angeles County MS4 Permit). The State Water Board invited comments on whether the watershed management program (WMP)/enhanced watershed management program (EWMP) compliance alternative contained in the Los Angeles County MS4 Permit is an appropriate approach for the State Water Board to consider if it chooses to revise the RWLs provisions in MS4 permits, which are set forth in State Water Board Order WQ 99-05. The Los Angeles Water Board appreciates the opportunity to provide its perspective on this important issue.

As an initial matter, the Los Angeles Water Board wishes to clarify that, by including the WMP/EWMP compliance alternative in the Los Angeles County MS4 Permit, it did not revise or otherwise modify the RWLs provisions in the permit. The RWLs provisions in the Los Angeles County MS4 Permit were carried over from the 2001 Los Angeles County MS4 Permit, consistent with Order WQ 99-05, and continue to require compliance with water quality standards.<sup>1</sup> The Los Angeles Board, consistent with federal law, has simply provided permittees the flexibility on how to achieve and demonstrate compliance with RWLs provisions through a WMP/EWMP.

<sup>1</sup> Los Angeles Water Board Order No. R4-2012-0175, Part V.A., pp. 38-39.

As explained below, the WMP/EWMP compliance alternative is an appropriate approach for the State Water Board to consider if it chooses to revise the RWLs provisions in MS4 permits, as currently set forth in Order WQ 99-05. This approach is appropriate in the Los Angeles Region because there have been numerous watershed based total maximum daily loads (TMDLs) adopted that contain wasteload allocations assigned to MS4 discharges. The Los Angeles Water Board and MS4 permittees have spent significant time and resources in developing and reviewing implementation and monitoring plans for these TMDLs.

Further, many MS4 permittees have already been collaborating on a watershed scale to successfully implement actions identified in those plans. The purpose of the WMP/EWMP approach is to provide a framework for permittees to implement the requirements of the Los Angeles County MS4 Permit in an integrated and collaborative fashion to address water quality priorities on a watershed scale, including complying with the requirements of RWLs provisions, TMDL provisions, non-stormwater discharge prohibitions, and minimum control measures that comprise a permittee's baseline storm water management program (SWMP).

The Los Angeles Water Board will first discuss the RWLs provisions in Order WQ 99-05 by setting forth the water quality benefits of the RWLs provisions and some of the implementation challenges experienced by the Board. Next, the Board will discuss the WMP/EWMP compliance alternative in the 2012 Los Angeles County MS4 Permit and explain why it is an appropriate approach.

### **State Water Board Order WQ 99-05**

Order WQ 99-05 appropriately requires MS4 dischargers to comply with water quality standards. As both a policy and legal matter, MS4 permits must include provisions to protect and enhance water quality and must include water quality based requirements to achieve this objective. MS4 permits, as with all NPDES permits, are intended to support the objective of the federal Clean Water Act "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."<sup>2</sup> Water quality standards, which are the basis for the RWLs in MS4 permits, are the foundation for achieving this objective. To ensure that discharges do not cause or contribute to exceedances of water quality standards, RWLs provisions are included in all NPDES permits issued pursuant to Clean Water Act section 402. Further, Clean Water Act section 402(p)(3)(B)(iii) provides specific authorization to USEPA or states to include other provisions the state determines appropriate for the control of pollutants in MS4 discharges.<sup>3</sup>

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<sup>2</sup> 33 U.S.C. § 1251(a).

<sup>3</sup> In addition, in its Phase I Stormwater Regulations, Final Rule, USEPA elaborated on these requirements, stating that, "permits for discharges from municipal separate storm sewer systems must require controls to reduce the discharge of pollutants to the maximum extent practicable, and where necessary water quality-based controls." (55 Fed. Reg. 47990, 47994 (Nov. 16, 1990).) USEPA reiterated in its Phase II Stormwater Regulations, Final Rule, that MS4 "permit conditions must provide for attainment of applicable water quality standards (including designated uses), allocations of pollutant loads established by a TMDL, and timing requirements for implementation of a TMDL." (64 Fed. Reg. 68722, 68737 (Dec. 8, 1999.)) USEPA Region IX has also affirmed the agency's position that MS4 discharges must meet water quality standards in a series of comment letters on MS4 permits issued by various California regional water boards. (See, e.g., letter from Alexis Strauss, Acting Director, Water Division, USEPA Region IX, to Walt Pettit, Executive Director, State Water Board, re: SWRCB/OCC File A-1041 for Orange County, dated January 21, 1998.) California Water Code section 13377 also requires that NPDES permits include limitations necessary to implement water quality control plans. The inclusion of RWLs is also consistent with the Ninth Circuit Court of Appeal's ruling in *Defenders of Wildlife v. Browner* (1990) 191 F.3d 1159, 1166, that the permitting authority  
(footnote continued on next page)

Both the State Water Board and Los Angeles Water Board have previously concluded that discharges from MS4s contain pollutants that have the reasonable potential to cause or contribute to excursions above water quality standards.<sup>4</sup> As such, RWLs are necessary to include in MS4 permits to ensure that individual and collective discharges from the MS4 do not cause or contribute to exceedances of water quality standards necessary to protect the beneficial uses of the receiving waters.

The Los Angeles Water Board is fully supportive of the goal of the RWLs provisions in Order WQ 99-05. In adopting Order WQ 99-05, the State Water Board recognized the need for water quality based requirements to protect water quality. The State Water Board also recognized the need for complementary provisions to ensure that, when MS4 discharges impacted water quality, there was a workable pathway to further control MS4 discharges with the ultimate objective of achieving water quality standards. The Board sees tremendous value in the language of Order WQ 99-05 as it emphasizes the required water quality outcomes (i.e., compliance with water quality standards) that should drive MS4 permittees' implementation of their SWMPs, including selection and design of best management practices (BMPs) and other control measures. As such, it provides consistent and clear performance targets for BMPs and other control measures.

In addition, the State Water Board recognized in Order WQ 99-05 that, in most cases, achievement of water quality standards by MS4 discharges cannot happen overnight as it takes time to plan and implement BMPs and other control measures. The Los Angeles Water Board has also recognized that, for many pollutants, immediate compliance by an MS4 discharger may be simply impossible. The Water Boards have generally recognized this by developing TMDLs that contain implementation schedules that give permittees the necessary time to comply. It is important to note that, in some cases, even traditional point sources do not have to meet RWLs immediately if a TMDL provides an implementation schedule for the traditional point sources.

While the Los Angeles Water Board supports the inclusion of RWLs provisions in MS4 permits, implementation of the provisions set forth in Order WQ 99-05 has not resulted in the water quality outcomes that the Los Angeles Water Board had hoped for. The Board has concluded that there are several reasons for this.

First, when an exceedance of a RWL was detected, due to the highly interconnected nature of the MS4s in the Los Angeles Region and thus the comingling of MS4 discharges of multiple permittees, accountability for the exceedance was often not assumed by an individual permittee or even a group of permittees. This was also exacerbated in part due to the limited monitoring locations, all of which were at locations in the lower portions of major rivers (i.e., mass emissions stations) intended to characterize the collective impact of discharges from multiple MS4 permittees on receiving waters.

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has discretion regarding the nature and timing of requirements that it includes as MS4 permit conditions to attain water quality standards. ((1990) 191 F.3d, 1159, 1166.)

<sup>4</sup> See, e.g., State Water Board Order WQ 2001-15 (Building Industry Association of San Diego), pp. 7-8 ("Urban runoff is causing and contributing to impacts on receiving waters throughout the state and impairing their beneficial uses. In order to protect beneficial uses and to achieve compliance with water quality objectives in our streams, rivers, lakes, and the ocean, we must look to controls on urban runoff.")

Second, while the provisions of Order WQ 99-05 set forth a process for addressing RWLs exceedances if a MS4 discharge was determined to have caused or contributed to the exceedances, the requirements for the process lacked specificity as to required actions. One key difficulty is the meaning of the so-called "iterative approach." The specific language in Order WQ 99-05 is subject to widely different interpretations by permittees and stakeholders. A popular interpretation amongst permittees is that the iterative approach is, in essence, a "trial and error" approach. While schedules and monitoring are mentioned, there are no parameters regarding expectations of timeframes or type(s) of additional monitoring needed. There is also little guidance on reporting or compliance evaluations. Because of this, the Board has received very few RWL Compliance Reports from permittees over the last decade despite frequent exceedances of water quality standards. On a rare occasion when a permittee has submitted a RWL Compliance Report, the report lacked specificity of actions to be taken (including proposed actions, a schedule, and additional monitoring) and a technically robust nexus to address the RWLs exceedances.<sup>5</sup> This is largely because the RWLs provisions, as written, gives permittees wide discretion on the level of detail to include in their plan to address RWLs exceedances. Many permittees also never came up with a definitive schedule to take action or achieve compliance. Some permittees also continued to implement the same BMPs over and over again, despite the fact that RWLs exceedances persisted, leading to the conclusion that the BMPs were not adequately controlling pollutants in MS4 discharges. Without greater specificity regarding expectations for such a plan, such as clear requirements for additional monitoring (including outfall data) and quantitative analysis to determine whether BMPs and control measures are expected to address the RWL exceedance(s), the provisions have not been effective in encouraging robust action plans and schedules to achieve compliance.

Third, despite the incorporation of the RWLs provisions of Order WQ 99-05 in the 2001 Los Angeles County MS4 Permit and other MS4 permits in the region, the emphasis continued to be on implementation of standard SWMPs (i.e., the same program elements and the same required level of effort for each element) by all permittees with little regard for the specific water quality issues of concern within the jurisdiction or surrounding area. This is due in part to the lack of provisions in Order WQ 99-05 requiring permittees to proactively evaluate (i.e., prior to SWMP and BMP implementation) the most appropriate SWMP elements and BMPs with the goal of achieving water quality standards. Rather, the RWLs provisions in Order WQ 99-05 are largely reactive in that permittees are only required to take certain actions to evaluate and modify their BMPs and control measures once there has been an exceedance of a RWL. In sum, there was little connection between implementation of the general RWLs provisions and the traditional programmatic requirements that had historically been the "bread and butter" of permit implementation.

Lastly, Order WQ 99-05 has not provided transparency to the public in a permittee's selection of BMPs and control measures. As previously noted, the RWLs provisions, as written, allow permittees to formulate a plan to address RWL exceedances. However, these plans are not subject to public review and comment.

### **2012 Los Angeles County MS4 Permit**

The Los Angeles Water Board adopted its fourth iteration of the Los Angeles County MS4 Permit on November 8, 2012. As required by federal law, one of the most significant additions to

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<sup>5</sup> The Los Angeles Water Board notes that it received the vast majority of the RWLs Compliance Reports after the Board had issued notices of violations to several permittees that discharge to Santa Monica Bay in 2008.

the fourth iteration of the permit was the incorporation of water quality based requirements to implement 33 watershed-based TMDLs.<sup>6</sup> The number of TMDLs in the Los Angeles Region is unprecedented in other regions in California. These TMDLs address hundreds of waterbody-pollutant combinations and cover every coastal watershed in Los Angeles County. Most of the TMDLs include implementation schedules that include the necessary time for MS4 permittees to achieve compliance with water quality standards. Most of these TMDLs also require MS4 permittees to develop detailed implementation and monitoring plans and to submit these plans for approval by the Board. Over the last several years, the Board and MS4 permittees have spent significant time and resources in developing, reviewing, and implementing those plans. Many permittees have also already been collaborating on a watershed scale to successfully implement actions identified in those plans. These permittees have reiterated their continuing commitment to implement watershed solutions to address all impairments in regional waters.

By incorporating these TMDL provisions, the Board recognized the need to make connections between the water quality based requirements of the permit (i.e., RWLs and TMDL provisions) and the programmatic elements of the permit (i.e., SWMP and non-storm water discharge prohibitions) by crafting the integrative framework of the WMPs/EWMPs.<sup>7</sup> Another way that the Board formed this connection is through the addition of outfall monitoring in order to better establish the linkage between MS4 discharges and receiving water quality. In addition, the Board wanted to encourage permittees to continue to work collaboratively on a watershed scale (including working with non-traditional stakeholders such as water agencies), as they had been during TMDL development and implementation.

The RWLs provisions in Part V.A. of the 2012 Los Angeles County MS4 Permit are the same as those included in the 2001 permit, consistent with Order WQ 99-05.<sup>8</sup> Thus, as with the 2001 permit, permittees are still required to comply with water quality standards. The Los Angeles Water Board, however, crafted another set of provisions, namely the WMP/EWMP provisions, which work in connection with the existing RWLs provisions.<sup>9</sup> The WMP/EWMP provisions also work in connection with the TMDL provisions and other programmatic sections of the permit.<sup>10</sup> The WMP/EWMP approach allows permittees the flexibility to customize the programmatic elements of the permit based on the required water quality outcomes, which is compliance with applicable water quality based effluent limitations (WQBELs) and water quality standards. WMPs/EWMPs must ensure that discharges from the permittee's MS4: 1) achieve applicable WQBELs in the TMDL provisions pursuant to the corresponding compliance schedules; 2) do not cause or contribute to exceedances of RWLs; and 3) do not include non-storm water discharges that are a source of pollutants.<sup>11</sup> WMPs/EWMPs must also ensure that controls are

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<sup>6</sup> In contrast, when the Board adopted the 2001 Los Angeles County MS4 Permit, there were no TMDLs in effect with wasteload allocations assigned to MS4 dischargers.

<sup>7</sup> This watershed management paradigm is consistent with federal regulations that support the development of permit conditions, as well as implementation of SWMPs, at a watershed scale. (See 40 C.F.R. §§ 122.26(a)(3)(ii), 122.26(a)(3)(v), and 122.26(d)(2)(iv).)

<sup>8</sup> Los Angeles Water Board Order No. R4-2012-0175, pp. 38-39.

<sup>9</sup> See generally *id.*, Part VI.C., pp. 47-66.

<sup>10</sup> Participation in a WMP/EWMP is voluntary and may be developed individually or by several permittees within a watershed. *Id.*, Parts VI.C.1.b. and VI.C.1.e., p. 47. Permittees that do not elect to develop a WMP/EWMP are subject to the baseline RWLs and storm water management program requirements and must demonstrate compliance with applicable WQBELs and RWLs through monitoring data. *Id.*, Part VI.C.4.e., p. 58.

<sup>11</sup> *Id.*, Part VI.C.1.d., p. 47.

implemented to the maximum extent practicable by implementing the minimum control measures that comprise a permittee's baseline SWMP.<sup>12</sup> In sum, achieving water quality standards remains the centerpiece of the WMP/EWMP approach.

The WMP/EWMP provisions include a more thorough and specific iterative process than that contained in Order WQ 99-05. The incorporation of 33 watershed-based TMDLs supported the need for a more proactive and rigorous iterative process, as the ultimate goal of a TMDL is to establish a plan so that a waterbody attains and maintains water quality standards. These provisions require permittees to establish a clear linkage between their MS4 discharges and receiving water quality. The WMP/EWMP provisions provide much more specific language than that of Order WQ 99-05, such as requiring an upfront quantitative "reasonable assurance" analysis (through modeling) that demonstrates that the proposed actions will achieve the required water quality outcomes.<sup>13</sup> This means that before permittees start implementing BMPs and control measures, they are required to do a technical analysis so that BMPs and control measures are selected and designed with the required water quality outcomes in mind. In this regard, this is not a strict "trial and error" approach. Rather, permittees have the opportunity to evaluate, *ex ante*, what they think will work and then target resources to implement those measures. The WMP/EWMP framework also requires clear, specific timeframes that are as short as possible and measurable milestones to ensure progress toward water quality requirements.

Permittees must also execute an integrated monitoring and assessment program to determine progress towards achieving RWLs and WQBELs.<sup>14</sup> The WMP/EWMP provisions work in conjunction with outfall monitoring to ensure that the program is resulting in the anticipated water quality outcomes and requires adaptive management when anticipated outcomes are not achieved. As part of the adaptive management process, permittees must modify strategies, control measures, and BMPs, as necessary, based on analysis of monitoring data to ensure that applicable WQBELs and RWLs and other milestones set forth in the WMP/EWMP are achieved in the required timeframes.<sup>15</sup>

The WMP/EWMP approach provides permittees flexibility on how to demonstrate compliance with permit requirements, including RWLs provisions. These compliance mechanisms provide an incentive and clear framework for permittees to craft comprehensive pathways to achieve compliance with RWLs – both those addressed by TMDLs and those not addressed by TMDLs. Specifically, the WMP/EWMP approach allows permittees to demonstrate compliance with interim TMDL deadlines (interim WQBELs and applicable interim RWLs) through implementation of actions in an approved WMP/EWMP.<sup>16</sup> Further, the EWMP approach allows permittees to demonstrate compliance with final WQBELs and associated RWLs within a

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<sup>12</sup> *Ibid.*

<sup>13</sup> *Id.*, Part VI.C.5.b.iv.(5)., pp. 63-64.

<sup>14</sup> *Id.*, Part VI.C.7., p. 66.

<sup>15</sup> *Id.*, Part VI.C.8., pp. 66-67.

<sup>16</sup> *Id.*, Part VI.C.3., p. 53 and Part VI.E.2.d.i.(4), pp. 143-144. In addition, regardless of a permittee's participation in a WMP or EWMP, the Los Angeles County MS4 Permit provides that a permittee's full compliance with the applicable TMDL requirements pursuant to the compliance schedules in the permit constitutes a permittee's compliance with the RWLs for the particular pollutant addressed by the TMDL. This is because the Los Angeles Water Board recognized that, in the case of impaired waters subject to a TMDL, the RWLs for the pollutants addressed by the TMDL may be exceeded during the period of TMDL implementation. *Id.*, Part VI.E.2.c., p. 143.

drainage area by implementing regional, multi-benefit retention projects that capture the runoff volume from the 85<sup>th</sup> percentile, 24-hour storm event, as well as all non-storm water that would otherwise discharge through the MS4 to receiving waters.<sup>17</sup> The permit also allows permittees to identify and address other waterbody pollutant combinations not otherwise covered by a TMDL in the same manner, including requirements to conduct: (1) an upfront reasonable assurance analysis that the proposed actions will be adequate to achieve the RWLs; (2) monitoring; (3) adaptive management based on monitoring results.<sup>18</sup> In this way, the permit provides a mechanism for water quality improvement without the administrative delay of developing and approving a TMDL.

The WMP/EWMP compliance mechanisms are contingent upon participating permittees being in *full compliance* with all requirements and dates for their achievement articulated in the permit and approved WMP/EWMP. These also include specific actions that permittees are required to implement during development of their WMP/EWMPs (up until WMP/EWMP approval), as follows: (1) a permittee must provide timely notice of its intent to develop a WMP or EWMP; (2) a permittee must meet all interim and final deadlines for development of a WMP or EWMP; (3) for the area to be covered by the WMP or EWMP, a permittee must target implementation of watershed control measures in its existing SWMP, including watershed control measures to eliminate non-storm water discharges of pollutants through the MS4 to receiving waters, *to address known contributions of pollutants from MS4 discharges that cause or contribute to exceedances of RWLs*; and (4) a permittee receives final approval of its WMP or EWMP within 28 or 40 months, respectively.<sup>19</sup> If a permittee fails to meet any requirement or date for its achievement, the permittee is subject to the provisions of Part V.A. for the waterbody-pollutant combination(s) that were to be addressed by the WMP/EWMP.<sup>20</sup> In sum, the WMP/EWMP approach allows permittees to implement approved control measures that are expected to ultimately achieve WQBELs and RWLs and provides permittees with the certainty that, if they do so in accordance with approved schedules, their actions would constitute compliance with applicable WQBELs and RWLs provisions.

WMPs/EWMPs also ensure an open and transparent process, as well as an opportunity for meaningful stakeholder input and review. This includes a technical advisory committee (TAC) that will advise and participate in the development of the WMPs/EWMPs from early on in the development process through the date of WMP/EWMP approval.<sup>21</sup> The composition of the TAC may include at least one permittee representative from each Watershed Management Area for which a WMP/EWMP will be developed, and must also include a minimum of one public representative from a non-governmental organization with public membership, and staff from the Los Angeles Water Board and USEPA Region IX.<sup>22</sup> The WMPs/EWMPs are also subject to stakeholder review and comment prior to approval by the Los Angeles Water Board.

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<sup>17</sup> *Id.*, Part VI.C.1.g., pp. 48-49 and Part VI.E.2.e.i.(4), pp. 144-145. In drainage areas within the EWMP area where retention of the 85<sup>th</sup> percentile, 24-hour storm event is not feasible, permittees shall demonstrate compliance with final WQBELs and RWLs through monitoring data, just as is required in a WMP. *Id.*, Part VI.C.1.g.v., p. 49 and Part VI.E.2.e.i.(1)-(3), pp. 144-145.

<sup>18</sup> See generally *id.*, Part VI.C.2., pp.49-53.

<sup>19</sup> *Id.*, Part VI.C.2.d, pp. 52-53, and Part VI.C.3.b., p. 53. A permittee's compliance with these requirements will be evaluated at various junctures, including through review of the permittee's annual reports.

<sup>20</sup> *Id.*, Part VI.C.2.c., p. 52 and Part VI.E.2.d.i.(4)(c), pp. 143-144.

<sup>21</sup> *Id.*, Part VI.C.1.f.v., pp. 47-48.

<sup>22</sup> *Ibid.*

The Los Angeles Water Board is aware that some petitioners have alleged that the WMP/EWMP provisions violate federal anti-backsliding and/or anti-degradation requirements. The Board disagrees with these contentions. The Board will be providing a more detailed response to these contentions in its response to the petitions. However, the Board has the following brief comments. First, it is unclear whether the federal anti-backsliding provisions in Clean Water Act section 402(o) and 40 C.F.R. section 122.44(l) apply to RWLs.<sup>23</sup> Second, to the extent that the anti-backsliding provisions apply, the WMP/EWMP provisions do not violate the anti-backsliding provisions. Consistent with the 2001 Los Angeles County MS4 Permit, the 2012 Los Angeles County MS4 Permit continues to require compliance with RWLs in Part V.A. of the permit. Thus, Los Angeles County MS4 permittees are still required to comply with water quality standards, although the Board, consistent with federal law, has simply provided permittees the flexibility on how to achieve and demonstrate compliance with RWLs provisions through a WMP/EWMP. Third, there are several statutory and regulatory exceptions to the anti-backsliding provisions. One of these exceptions is new information that was not available at the time the previous permit was issued.<sup>24</sup> When the previous permit was adopted in 2001, there were no TMDLs in effect with wasteload allocations assigned to MS4 discharges. The 2012 Los Angeles County MS4 Permit includes new provisions implementing 33 watershed-based TMDLs adopted since 2001 that are applicable to MS4 discharges. Had these TMDLs been in place in 2001, the 2001 Los Angeles County MS4 Permit might have included different provisions. The inclusion of these TMDLs reflects a paradigm shift from a prescriptive programmatic approach to water quality improvement to a watershed management approach and more specific water quality based requirements. The WMP/EWMP approach allows permittees to schedule implementation of control measures in consideration of all water quality priorities to achieve compliance with water quality standards as soon as possible and consistent with applicable TMDL implementation schedules. Further, the WMP/EWMP plans that will be submitted to the Board, and eventually approved, will be based on new information from modeling and monitoring of the effectiveness of BMPs and other control measures. And, as previously noted, the permittees will have to periodically reevaluate and revise their WMPs/EWMPs based on new information learned through the adaptive management process. For these reasons, the WMP/EWMP does not violate federal anti-backsliding requirements.

Lastly, the WMP/EWMP provisions do not violate federal and state anti-degradation provisions. The 2012 Los Angeles County MS4 Permit does not allow receiving waters to be degraded. In order to get the benefit of the compliance mechanisms in a WMP/EWMP, permittees must, up until WMP/EWMP approval: (1) continue to implement watershed control measures in their existing SWMPs; (2) continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters; and (3) implement watershed control measures, where possible from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash WQBELs and all other final WQBELs and RWLs by the applicable compliance deadlines occurring prior to approval of a WMP or EWMP.<sup>25</sup>

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<sup>23</sup> The Los Angeles Water Board first notes that section 402(o) of the Clean Water Act refers only to "effluent limitations." RWLs are not "effluent limitations." In addition, while the Board recognizes that 40 C.F.R. section 122.44(l) initially refers to "effluent limitations, standards, or conditions," all further references in subdivision (l) only refer to "effluent limitations."

<sup>24</sup> 33 U.S.C. § 1342(o)(2)(B)(i); 40 C.F.R. § 122.44(l)(2)(i)(B)(1).

<sup>25</sup> Los Angeles Water Board Order No. R4-2012-0175, Part VI.C.4.d., pp. 57-58.



## Conclusion

For the reasons explained above, the WMP/EWMP compliance alternative is an appropriate approach for the State Water Board to consider if it chooses to revise the RWLs provisions in MS4 permits, as currently set forth in Order WQ 99-05. Achieving water quality standards remains the centerpiece of the WMP/EWMP approach. The WMP/EWMP approach: (1) establishes a better connection between SWMPs and water quality based requirements; (2) provides for greater specificity and thus accountability to address water quality requirements, including exceedances of RWLs; (3) provides a more proactive and rigorous iterative process, while recognizing that, for some pollutants, immediate compliance is not possible; and (4) also provides greater transparency and opportunities for stakeholder input. Based on the Board's experiences with the first three iterations of the Los Angeles County MS4 Permit, the Los Angeles Water Board firmly believes that, as a whole, the 2012 Los Angeles County MS4 Permit is more likely to actually result in attainment of water quality standards than the prior 2001 permit.

Lastly, the Los Angeles Water Board realizes that its WMP/EWMP approach may be one of several alternative approaches that the State Water Board should consider as other regional water boards may also have appropriate alternatives that take into account their own unique MS4 circumstances. The Board recognizes that the design of the WMP/EWMP approach is largely supported by the established TMDLs and implementation and monitoring plans in the Los Angeles Region, which have resulted in wide-spread water quality based collaboration among MS4 permittees. The Board understands that the WMP/EWMP approach may not be as effective of an approach for other regions that have not yet developed a comprehensive suite of TMDLs and made corresponding commitments to implementation and monitoring to address water quality impairments.

If you have any questions, please contact me at [sunger@waterboards.ca.gov](mailto:sunger@waterboards.ca.gov) or at (213) 576-6605.

Sincerely,



Samuel Unger, PE  
Executive Officer

Enclosures: Exhibit A – Petitioners and their Counsel of Record Contact List  
Exhibit B – MS4 Dischargers Mailing List

cc: See next page

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Exhibit A- Petitioners and Their  
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Exhibit B – MS4 Dischargers List

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