SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

LOS ANGELES COUNTY OFFICE OF EDUCATION
INDUSTRIAL PERMIT TESTIMONY
STATE WATER RESOURCES CONTROL BOARD (SWRCB) HEARINGS
JANUARY 27, 2005

Good Morning...My name is Roger Chang and I represent the Los Angeles County Office of Education or "LACOE" as we are commonly referred to.

We are the nation's largest regional educational agency and assist in the administration of the 80 school district and 13 community colleges located in Los Angeles County. There are over 1.7 million students in the districts we represent. Our goal is to help the county's public school students achieve the best possible education.

Let me start by saying LACOE and the educational community very much appreciates that the SWRCB has recognized that public schools are "Non-Traditional" governmental agencies.

Further, the educational community fundamentally agrees that we must protect our environment and to that end we have many districts who participate in environmentally friendly programs such as: integrated pest management; hazardous waste management; fats, oil and grease management; and solid waste management and recycling programs. The curriculum of every school district includes some environmental studies.

The biggest obstacle for the educational community to accept the proposed revisions is the added cost and the immediate loss of benefits to children. Both the Federal and State budgets do not provide funding to implement the revised Industrial Permit.

The state's on going fiscal crisis continues to make it extremely difficult for school districts to accomplish all of their mandated educational goals. To add more requirements and associated costs will put schools further behind.

Ultimately, for every additional dollar spent on storm water compliance...schools have one less dollar to spend on educating children. Educational programs like class size reduction, improved student achievement test scoring, and Americans with Disabilities Act requirements are in direct competition for Industrial Permit compliance.

If a school district has to spend an additional $500...that's about 30 less books they cannot provide.

If a school district has to spend an additional $2,000...that's one less metal detector to screen for weapons being carried on to a campus.

If a school district has to spend $4,000...that's a replacement job to fix a leaking school roof or a repainting job to cover over gang graffiti.

And what do school districts get for the added cost of implementing the Industrial Permit? What immediate benefits will these additional regulations give schools?

What the educational community does not understand is if schools are not polluting dischargers...why do we have to adopt more strict requirements? If schools are already in compliance...is the value of additional compliance mechanisms an equitable trade if they come at the expense of educational programs? Schools have immediate problems that have to be addressed. The environmental community has immediate actions that have to be addressed and resolution of both concerns come at the expense of each other.

The bottom line is that the educational community would like to be exempted from these revisions. The educational community still endorses being regulated under the existing Industrial Permit. We realize that we should not be totally unregulated. However, we feel these additional regulations come at too high a price for the educational community. This is especially relevant now because of the proposed change in how education will be funded in the future.

Lastly, I would hope that whatever regulations are finally adopted...and again, I hope that the educational community is exempted...that a regional board cannot pass additional regulations and completely reverse the policy that the SWRCB has adopted.

In April 2003, the SWRCB passed the Small MS4 storm water permit. That permit contained policies that the educational community believed would govern post construction design requirements and provide for exemption for school districts that were in the middle of construction or that had submitted their construction projects to the Division of the State Architect by April 2003 with final approval by the State Allocation Board by December 31, 2004.

The Los Angeles Regional Water Quality Control Board (LA Regional Board) notified one of our school districts that it was their intent to retro-actively enforce a January 2000 regional resolution that will take away every major post-construction design exemption that the SRWCB granted to the educational community.

Moreover, the LA Regional Board wants to enforce their post construction design requirement retro-actively to January 2000. If the LA Regional Board ultimately decides to enforce this action, it has the potential to force some school districts into bankruptcy and disrupt the education process for thousands of students.

My point is...if the SWRCB grants the educational community an exemption...we would hope that the LA Regional Board could not take it away retro-actively. I have provided documentation regarding my comments today and the LA Regional Board request and our response.

The LACOE very much appreciates the opportunity to address the SWRCB with our concerns.

Questions regarding these comments should be made to:
Roger Chang
Los Angeles County Office of Education
Telephone: (562) 940-1645 Email: chang_roger@lacoe.edu

Los Angeles County Office of Education

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October 12, 2004

Mr. Jonathan Bishop, Executive Officer
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013-2343

Dear Mr. Bishop:

This letter is in response to a request for comments regarding the attached June 30, 2004, draft letter, addressed to Mr. Roy Romer, Superintendent of the Los Angeles Unified School District (LAUSD). The request for comments was made by Mr. Xavier Swamikannu, Chief of the Los Angeles Coastal Unit, at the June 30, 2004, LAUSD/City of Los Angeles Integrated Resources Plan meeting. Mr. Swamikannu explained that the letter is a draft and had not yet been reviewed by your legal counsel.

Since my initial conversation with Mr. Swamikannu, it is my understanding that the Los Angeles Regional Water Quality Control Board (Regional Board) intends to distribute a letter similar to the final LAUSD letter to all school districts in Los Angeles County. However, every school and community college district located in Region 4 (Los Angeles County, Ventura County, and portions of Kern and Santa Barbara counties) where the Regional Board intends to require retroactive post-construction Standard Urban Storm Water Mitigation Plan (SUSMP) compliance, as outlined in your draft letter, should receive the same information.

Your draft letter directs LAUSD to comply **retroactively** with certain storm water pollutant mitigation requirements that have been in effect since January 26, 2000. This retroactive compliance would result in significant costs for districts in Region 4. In addition, many districts feel that this issue was already addressed at the State Water Resources Control Board (State Board) hearings (on October 28, 2002, December 2, 2002, and April 30, 2003) on the Small Municipal Separate Storm Sewer Systems (Small MS4) Permit.

At the June 30, 2004, meeting, Mr. Swamikannu emphasized the following three points:

Intention to Enforce Resolution No. R-00-02 (January 26, 2000)

It is the intent of the Regional Board to enforce Resolution No. R-00-02 enacted on January 26, 2000. This resolution requires new development and redevelopment projects in Los Angeles County to control the discharge of storm water pollutants by adopting post-construction design standards specified by the SUSMP.

Small MS4 Exclusions Do Not Apply to School Districts

The Small MS4 Permit, which **excludes** school districts from specified retroactive post-construction requirements, does **not** apply to LAUSD or any other school or community college district in Region 4 because no district is required (designated) to comply with the Small MS4 as yet. Further, the Regional Board still expects districts to adopt SUSMP criteria, consistent with Resolution No. R-00-02, after they are notified to comply with the Small MS4.

Additionally, the "Grandfathered Projects" exclusion, which was negotiated to cover those construction projects submitted to the Division of the State Architect prior to the approval of the Small MS4 Permit, and approved for funding by the State Allocation Board by December 31, 2004, is not applicable to the LAUSD or any other district because no district has been designated as yet.

Retroactive Compliance is Required

The post-construction control requirements have been in effect since January 26, 2000. Compliance is effective back to January 26, 2000, and **all new construction and modernization projects authorized for approval from January 26, 2000, to the present must retroactively comply** with the post-construction SUSMP.

I am very concerned about the Regional Board's intentions for the following reasons:

- Modified post-construction requirements were discussed at great length at the State Board Small MS4 hearings. The State Board, after extensive testimony from districts, approved less-costly post-construction requirements for school and community college districts. The education community was led to believe that the post-construction standards developed for the Small MS4 would be the basis for post-construction compliance in the Phase 2 Construction Permit and that numerical post-construction design requirements would be generally applicable to parking lots **only.**

- Since January 26, 2000, LAUSD has designed, built, and opened multiple schools in compliance with their understanding of Phase 1 regulations. Since the inception of Resolution No. R-00-02, LAUSD has received notification from

the State Department of General Services, Division of the State Architect; the County of Los Angeles; and the City of Los Angeles that the LAUSD is **not** governed by Resolution No. R-00-02.

- LAUSD and many other school and community college districts have millions of dollars invested in construction plans which have already been approved by the State Office of Public School Construction, and which do **not** incorporate the post-construction SUSMP requirements. Mandating retroactive compliance could require redesign and rebidding of contracts, and could lead to costly litigation instead of building more classrooms.

- Schools and community colleges are not sources of storm water pollution. The requirement to both design and build an infra-structure to capture and treat storm water, **and** create a maintenance program to clean and inspect school grounds to reduce storm water pollution is redundant, and strains education budgets that are already required to fund compliance with new state-mandated maintenance requirements.

- The intended actions of your letter may be in direct conflict with the intent of the Governor's Executive Order S-2-03 passed in November 2003.

- The State Board recognized that educational agencies are different from general government, and created a "Non-Traditional" category to address education's unique needs. Many of the special considerations granted by the State Board would be retroactively eliminated by the proposed actions in your letter.

It is my hope that the Regional Board can find some common ground to work with the education community. Education agencies could be a major partner with all regional boards in educating the general population on many environmental issues, including storm water pollution. LAUSD, for example, is working on many environmental programs in excess of any storm water permit requirement (e.g., Integrated Pest Management program, Food, Oil and Grease program, and Solid Waste Collection program). The Regional Board does not have the tools or resources to reach the next generation of voters, business owners, and residents that schools **can** reach. A partnership between educational agencies and the Regional Board would be major step in creating and implementing education programs beyond the Small MS4.

I would recommend that the Regional Board require educational agencies to place extra emphasis on educational programs related to this issue in exchange for allowing them to comply with the post-construction design standards that the State Board has already granted to education.

Thank you for the opportunity to share my concerns. If you have any questions regarding this letter, please contact me at (562) 940-1645.

Sincerely,

Roger Chang

Roger Chang
Regionalized Business Services Coordinator
Division of Business Advisory Services

RC:mc/mb
Attachment

cc: Mr. Shelton, Los Angeles County Office of Education (LACOE)
Ms. Simons, LACOE
Mr. Villanueva, LACOE

California Regional Water Quality Control
Los Angeles Region
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June 30, 2004

Mr. Roy Romer
Superintendent of Schools
Office of the Superintendent
333 S. Beaudry Ave., 24th Floor
Los Angeles, CA 90017

STORM WATER MANAGEMENT PROGRAM FOR LOS ANGELES UNIFIED SCHOOL DISTRICT FACILITIES

Dear Mr. Romer:

This letter is to inform you of the federal storm water regulations and permitting requirements that are applicable to school district facilities in the Los Angeles Region, and also provide clarification on a couple of issues in regard to post construction design standards as identified by the Los Angeles Unified School District (LAUSD) staff during a meeting on February 17, 2004.

There are three National Pollutant Discharge Elimination System (NPDES) permits for storm water discharges, that may apply to LAUSD:

General Industrial Activity Storm Water Permit

The General Industrial Activity Storm Water Permit (GIASP) (Permit No. 97-03-DWQ) is an NPDES permit that regulates discharges associated with ten (10) broad categories of industrial activities. For LAUSD, the coverage under GIASP is limited to school bus maintenance yards at this time. LAUSD for all such facilities must already have submitted a Notice of Intent for coverage to the State Water Resources Control Board, prepared and implemented a Storm Water Pollution Prevention Plan (SWPPP), and conducted monitoring as required.

General Construction Activity Storm Water Permit

The General Construction Activity Storm Water Permit (GCASP) (Permit No. 99-08-DWQ) is an NPDES permit that regulates discharges associated with projects that disturb one or more acres of soil. LAUSD must have already submitted for all construction projects that disturb one or more acres of land, a Notice of Intent for coverage to the State Water Resources Control Board, and prepared and implemented a SWPPP. The SWPPP must identify and implement adequate post construction controls. GCASP states that Post construction Best Management Practices (BMPs) "must be consistent with all local post construction storm water management

Draft - For discussion purpose only.

requirements, policies, and guidelines." The Los Angeles Regional Water Quality Control Board (Regional Board) has adopted Resolution No. R-00-02 on January 26, 2000 for new development and redevelopment projects in Los Angeles County to control the discharge of storm water pollutants in post construction storm water (See Attachment). For post construction BMPs, the Resolution requires all construction projects subject to coverage under the GCASP to meet, at minimum, numeric design standards specified under the Standard Urban Storm Water Mitigation Plan (SUSMP) which are applicable to all Phase 1 MS4 municipalities in the Los Angeles Region.

Small Municipal Separate Storm Sewer Systems Permit

The Small Municipal Separate Storm Sewer Systems (MS4) Permit (Permit No. 2003-0005-DWQ) is an NPDES permit that regulates discharges from traditional Small MS4s such as serving a population of 50,000 people or more, or that are subject to high growth, currently not being permitted under Phase I MS4 Permit, and non-traditional MS4s such as federal and state facilities including school districts. An "MS4" is a conveyance or system of conveyances designed or used for collecting or conveying storm water. Under the Small MS4 Permit, non-traditional Small MS4s, such as the LAUSD, are not automatically designated for coverage. Rather, the Regional Board must first designate a non-traditional Small MS4s before it is required to apply for coverage under this General Permit. Due to current resource limitations at the Regional Board, it is unlikely that LAUSD will be designated for coverage under the Small MS4 Permit during the upcoming fiscal year (July 2004 to June 2005). Hence, the Small MS4 Permit provisions do not currently apply to LAUSD.

At the February 17, 2004 meeting, LAUSD staff were under the impression that only school parking lots were subject to post construction design standards, despite the express language in Resolution No. R-00-02. The confusion seems to have arisen because of Attachment 4 in the Small MS4 Permit, which contains the same categories and definitions as in the Los Angeles County SUSMP. These categories are not applicable, because the Regional Board has not yet designated LAUSD as an entity subject to permit coverage under the Small MS4 Permit. The Regional Board expects that, after formal designation, the LAUSD will develop for implementation a comprehensive plan for post construction control measures consistent with the SUSMP numerical design criteria that are applicable to all Phase 1 MS4 municipalities in the Los Angeles Region.

Also at the February 17, 2004 meeting, a question arose as to the date when the post construction control requirements became effective. While the Small MS4 Permit states that it "does not require redesign of K-12 school or community college facilities that have been submitted to the Department of General Services, Division of the State Architect before adoption of the permit, and which receive final approval from the State Allocation Board or the Public Works Board, as appropriate, on or before December 31, 2004," the above provisions do not apply to LAUSD presently. As stated before, the post construction control requirements

in the GCASP as interpreted in Resolution No. R-00-02, are applicable and have been in effect since January 26, 2000.

In summary, the only governing NPDES permit for a post construction control program applicable to LAUSD at this time is the GCASP. In the Los Angeles Region, a post construction control program being implemented under the GCASP is required to meet, at a minimum, the numerical design standards specified under the SUSMP per Resolution No. R-00-02. This means that the entire project area must be considered for compliance with the SUSMP design standards, not just parking lots. The date for compliance has been in effect since January 26, 2000.

We appreciate the proactive steps taken by the LAUSD in preparation for designation for coverage under the Small MS4 Permit. We also applaud LAUSD for their Leadership Excellence through the Administrator Development (LEAD) program as well as their cooperative participation toward implementation of the City of Los Angeles Integrated Resources Plan (IRP) to meet City's wastewater, urban runoff and recycled water needs through the year 2020. We also note the adoption of a Resolution on Sustainability and the Design and Construction of High Performance Schools by the LAUSD Board of Education on October 27, 2003. The Resolution was adopted to develop BMPs that will result in efficient use of water resources, and maximize beneficial use of storm water runoff.

If you have any further questions or comments, please feel free to contact Michael Yang at (213) 620-2093 on my staff.

Sincerely,

Dennis A. Dickerson
Executive Officer

Enclosure

cc: Michael Lauffer, Office of Chief Counsel, State Water Resources Control Board
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board
Jarma Bennett, Division of Water Quality, State Water Resources Control Board
Dan Lafferty, Los Angeles County Department of Public Works
Angelo Bellomo, Los Angeles Unified School District
Roger Chang, Los Angeles County Office of Education
Tom Duffy, California's Coalition for Adequate School Housing
Andy Lipkis, Tree People

Draft - For discussion purpose only.

State of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION

Resolution No. R-00-02

APPROVING THE
STANDARD URBAN STORM WATER MITIGATION PLAN
FOR
MUNICIPAL STORM WATER AND URBAN RUNOFF MANAGEMENT PROGRAMS
IN LOS ANGELES COUNTY

WHEREAS, THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION FINDS:

1. On July 15, 1996, a municipal separate storm sewer system permit (Los Angeles County MS4 Permit) was issued to the County of Los Angeles and 85 incorporated cities to control and minimize the discharge of pollutants associated with storm water and urban runoff. This permit became Regional Board Order No. 96-054, Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles.

2. On June 30, 1999, a municipal storm water permit was issued to the City of Long Beach (City of Long Beach MS4 Permit) which removed the City of Long Beach from Board Order No. 96-054, giving the City of Long Beach its own distinct Municipal Storm Water and Urban Runoff NPDES permit, Regional Board Order No. 99-060, "Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the City of Long Beach".

3. On August 19, 1999, a statewide general storm water permit for construction activity (Statewide Construction Storm Water Permit) was adopted by the State Water Resources Control Board (State Board). This permit became State Board Order No. 99-08-DWQ, and applies to construction projects that disturbs five acres or more or is part of a larger common plan of sale in the Los Angeles region.

4. Many of the rivers and streams in Los Angeles County are formally designated as impaired, pursuant to Section 303 (d) of the federal Water Pollution Control Act, for specific pollutants that are commonly found in storm water and urban runoff.

5. Storm water runoff carries with it many pollutants in varying concentrations that are suspended in, and or dissolved, in the runoff. The sources of these pollutants include nearly all properties that have been developed since the pollutants originate through the many diverse activities of habitation and land use. Pollutants generated from individual property developments vary greatly in the concentration or loading of each pollutant. Generally, the relative contribution of the pollutant from runoff from any individual property development will represent only a small portion of the entire loading of a water body given the many square miles of land upon which storm water runoff is generated. When the individual contributions from tens of thousands of discrete property units are aggregated, the pollutant loading becomes significant. The resultant pollutant loads results in the impairment of that water body and the conveyance of pollutants, including sediments, metals, complex organic compounds, oil and grease, nutrients, and pesticides to the ocean and harbors within Los Angeles County. The loading of pollutants generated in the Los Angeles area are being measured through the monitoring program being conducted by the Los Angeles County Department of Public Works in conformance with its obligations as the Principal Permittee under the Los Angeles CountyMS4 Permit.

6. The nature of property use is related to the types and quantities of pollutants that are transported from that property during a rainfall event.

7. As property is developed or redeveloped, the utilization of Best Management Practices provide an opportunity to reduce the loading of pollutants to water bodies. This is accomplished by various techniques and can be passive (source reduction) or active (treatment). As property is developed from undisturbed lands, the project can be designed to incorporate Structural or Treatment Control (Best Management Practices (BMPs) that would normally not be available or practical to use on property that has been in urban use.

8. BMPs are effective means of reducing pollutants and Structural or Treatment Control BMPs can be "designed-into" a project in a cost effective way and in a manner that is either transparent to or which enhances the use to which the property has been placed. Some BMPs encourage the setting aside of areas as a greenbelt to allow storm water runoff to flow over areas which are permeable, thereby allowing all or a portion of the runoff to infiltrate. Other BMPs can be designed and built into structures such as catch basins that incorporate replaceable filters to absorb oily wastes or by installing screens to prevent litter from passing through the system and into the water body.

9. Arrays of Structural or Treatment control BMPs are available to developers of both new and redevelopment properties. The use of BMPs is already required by the terms of the Los Angeles County and Long Beach Municipal Storm Water and Urban Runoff NPDES permits.

10. The ability of any BMP to be effective is limited by the volume of water that the BMP is exposed to in any discrete period of time. A BMP that can only be effective for a small volume of storm water runoff is inherently less effective than one sized to accommodate a larger volume of water.

11. Storm water runoff will normally convey a disproportionate loading of pollutants in the initial period runoff is generated during a storm event. Storm events generating up to 0.75 inches of precipitation, measured over a 24-hour period, constitute 85 percent of the total amount of runoff that can be expected during an average wet season. Designing a BMP to be able to accommodate this amount of runoff will result in the application of a BMP intervention to all but 15% of the total runoff during a year, and usually all of the critical runoff that occurs in the early phase of the precipitation event, commonly referred to as the "first Flush."

12. Both the Los Angeles County MS4 Permit (Part III.A.1.c) and the City of Long Beach MS4 Permits contain provisions related to the adoption of Standard Urban Storm Water Mitigation Plans (SUSMPs) requiring their development and implementation.

13. Standard Urban Storm Water Mitigation Plans are required for a specified set of enumerated projects and the permit specifically identifies seven distinct categories for which SUSMPs are required to be prepared. The permit specifically states that the seven categories of projects are the minimum categories requiring SUSMPs.

14. Standard Urban Storm Water Mitigation Plans are also required for development or redevelopment of Parking Lots 5,000 square feet or greater and Locations in Environmentally Sensitive Areas. These categories have been added to advance efforts to control storm water pollution beyond the minimum in Los Angeles County.

15. Standard Urban Storm Water Mitigation Plans are required to be approved by the Regional Board Executive Officer following which they are to be implemented by the Permittees and used by the Permittees as the minimum criteria for the approval of project specific Urban Storm Water Mitigation Plans and the issuance of grading or building permits to project applicants.

16. The Statewide Construction Storm Water Permit requires that Storm Water Pollution Prevention Plans (State SWPPPs) contain post-construction BMPs that will be implemented after construction is complete.

17. Section 402 (p) of the Clean Water Act requires the Administrator of the United States Environmental Protection Agency or her designated agent, in this instance, the Regional Board, to require as part of the storm water program "controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods, and such other provisions as the Administrator or the State determines appropriate for the control of such pollutants." [USC Section 1342 (p)(3)(B)].

18. A recent decision of the United States 9th Circuit Court of Appeals, *Defenders of Wildlife v. Browner* (1999) Case No. 98-71080, provides additional support and clarification of the authority of the Administrator and the Regional Board to impose additional controls on storm water pollution. The Court in *Defenders of Wildlife v. Browner* said that the USEPA and the States have discretion under the law to determine what pollution controls are appropriate to achieve compliance.

19. Pursuant to the requirements of Regional Board Order No. 96-054, Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, the Regional Board Executive Officer received a proposal for Standard Urban Storm Water Mitigation Plans submitted by the Principal Permittee.

20. Upon the review of the Regional Board Executive Officer, the Standard Urban Storm Water Mitigation Plan submitted for the seven applicable categories was deemed inadequate. A revised SUSMP proposal was developed subsequent to a discussion of the proposal's conceptual foundation at a public workshop held on August 10, 1999. This workshop was well attended with over 80 municipal representatives and interested parties participating.

21. On August 16, 1999, a public notice was issued indicating that the Standard Urban Storm Water Mitigation Plans proposed by the Principal Permittee would be augmented by the addition of criteria related to specifying numerical design criteria for BMP construction. The matter was noticed for the Regional Board's September meeting to allow the issue to be discussed before the Board although no formal action of the Regional Board itself is required for SUSMP approval.

22. On September 16, 1999, the Regional Board conducted a public hearing on the Standard Urban Storm Water Mitigation Plan proposal as amended by the Executive Officer. At that hearing, the Regional Board Executive Officer suggested additional time would be necessary to develop a more comprehensive proposal incorporating the comments received at the public hearing.

23. Between September 16, 1999 and January 25, 2000, the Regional Board Executive Officer met with interested parties to discuss comments and concerns from interested parties.

24. The Southern California Council of Governments (SCAG) has indicated its interest in obtaining funding to prepare a regional plan(s) to address storm water pollution and identify regional treatment solutions for implementation.

25. On December 7, 1999, the Regional Board Executive Officer released a revised Standard Urban Storm Water Mitigation Plan document to interested parties.

THEREFORE BE IT RESOLVED THAT:

. The Regional Board endorses the Standard Urban Storm Water Mitigation Plan prepared by the Regional Board Executive Officer and noticed to the public on December 7, 1999 and the concepts therein relating to numerical storm water mitigation standards for Best Management Practices; and

2. The Regional Board directs the Regional Board Executive Officer to approve the Standard Urban Storm Water Mitigation Plan at the earliest opportunity incorporating changes made and formally approved by the Regional Board at the January 26, 1999 Board Hearing;

3. The Regional Board adopts the approved requirements as provisions applicable to the SUSMP requirements for the City of Long Beach.

4. The Regional Board adopts the numerical mitigation standards for storm water, endorsed herein, as the minimum design criteria for review of post-construction BMPs in the Los Angeles Region for construction projects subject to coverage under the Statewide Construction Storm Water Permit.

5. The Regional Board encourages the Permittees and all interested parties to work together in a spirit of cooperation to effect the implementation of the Standard Urban Storm Water Mitigation Plan at the earliest possible date, and

6. The Regional Board encourages the efforts by the Southern California Council of Governments and area Council of Governments (COGs) to develop regional plans and identify regional solutions to address storm water pollution from new development and redevelopment.

I, Dennis Dickerson, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of a Resolution adopted by the California Regional Water Quality Control Board, Los Angeles Region, on January 26, 2000.

ORIGINAL SIGNED BY

DENNIS A. DICKERSON
Executive Officer