



August 15, 2013

Emel G. Wadhvani
Senior Staff Counsel
State Water Resources Control Board
1001 I Street
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Re: SWRCB/OCC File A-2236(a) Through (kk)

Dear Ms. Wadhvani:

The City of National City ("City" or "National City") is pleased to submit these comments on the State Water Resources Control Board's ("State Board") receiving water limitations ("RWL") language and the two questions the State Board has asked about the Los Angeles County MS4 Permit's ("LA Permit") RWL approach. The City is happy to see the State Board ask these questions, it looks forward to the early fall State Board workshop on the topic, and it urges the State Board to make meaningful revisions to the current RWL language. Revisions to the current RWL language are particularly important in light of the 9th Circuit Court of Appeals' decision issued August 8, 2013¹, which is more fully discussed below.

I. Why the Current RWL Language is a Concern to National City

National City is located in southwest San Diego County, and is bordered by the City of San Diego, the City of Chula Vista, and unincorporated portions of San Diego County. The City covers approximately 9 square miles and has a population of approximately 55,000 residents. National City lies entirely within the San Diego Bay Watershed, and is located within the Sweetwater and Pueblo San Diego sub-watersheds. Although the City comprises only about 1.6% of the San Diego Bay Watershed, it is one of the most densely populated areas in the watershed.

As with many cities during the great recession, National City struggles with decreasing revenue sources and increasing demands for services. These fiscal challenges require the City Council to carefully balance its expenditures to make sure that the residents of National City are receiving the best value for its limited resources, including for its water quality program. Many of the residents of National City struggle economically as well. Approximately 20% of the City's resident have incomes listed below the poverty level and the average household income of National City's residents is well below California's average.

¹ *Natural Resources Defense Council v. County of Los Angeles* (9th Cir. August 8, 2013) ____ F.3d ____ [Dock. No. 10-56017].

The financial realities facing the City and its residents require the City to make difficult spending choices in order to continue to fund all essential governmental services, including, among other things, water quality improvement programs. The current RWL language, as interpreted by the 9th Circuit Court of Appeals,² upsets the City's careful balancing of its limited resources by forcing the City to chase all pollutants, at all times, in all receiving waters, regardless of the relative water quality benefits of such efforts. This is not good policy, either from a fiscal or from a water quality perspective.

The State Board's current RWL language and its potential revision are particularly vital issues for National City because of the Regional MS4 Permit recently adopted by the San Diego Regional Water Quality Control Board. The Regional MS4 Permit contains the State Board's current RWL language, which has been interpreted as requiring strict compliance with water quality standards. At the same time, however, the Regional MS4 Permit includes mandatory water quality improvement plans ("WQIPs"), that require significant expenditure of funds and effort outside of National City with no corresponding compliance benefits such as those found in the LA Permit. This mandatory WQIP approach without RWL language reform, in our opinion, is not an appropriate way to approach the issue and will place a significant strain on National City's already overstrained municipal budget.³

From the City's perspective, therefore, the current RWL language presents real challenges and drives decisions that inhibit the achievement of superior water quality results. National City therefore urges the State Board to revise the current approach through a precedential order that would apply to, among other things, the Regional MS4 Permit.

II. Why the Receiving Water Limitations Language Can and Should be Revised

The current RWL language thus presents both fiscal and water quality challenges for the City. Revising the RWL language could alleviate the fiscal challenges by allowing the City to focus its resources on the highest water quality benefits. Of course, the City must still be held accountable through specific, enforceable requirements, and the City is not looking for a free pass. Rather, the State Board should use this opportunity to make meaningful revisions to the RWL language that continue to hold discharges accountable for their actions but also allow for a broader, more integrated approach to solving water quality problems.

The State Board has the power to make such changes, and should do so through a state-wide precedential order. The legal support for the revisions to the RWL language is briefly set forth below.

A. Initial Development of the RWL Language

The current RWL language was originally developed based what case law has subsequently made clear was a misunderstanding of requirements of the Clean Water

² *Natural Resources Defense Council v. County of Los Angeles* (9th Cir. 2011) 673 F.3d 880, *rev'd on other grounds by* 133 S.Ct. 710 (2013).

³ This problem has been made worse by the 9th Circuit's August 8, 2013 decision. That decision appears to suggest that dischargers may be held jointly liable for receiving water exceedances, even without specific evidence that the individual discharger actually discharged the pollutants causing or contributing to the exceedance. To avoid such liability without evidence, dischargers will be compelled to turn inward and focus only on their discharges.

Act. In 1991, the State Board concluded that Section 402(p)(3)(B) of the Act required that MS4 permits must contain effluent limitations based on water quality standards in accordance with Section 301 of the Act.⁴ The State Board reasoned that the maximum extent practicable ("MEP") standard in Section 402(p)(3)(B) only modified the technology-based requirements of Section 301, and left in place the water quality-based requirements of Section 301, even if those requirements were more stringent than MEP. The State Board thus concluded that MS4 permits had to contain water quality-based effluent limitations pursuant to Section 301.

Subsequent State Board decisions expressly confirmed that the State Board intended the RWL language to implement the requirement of Section 301(b)(1)(C) to include more stringent effluent limitations necessary to meet water quality standards.⁵ Based on this misinterpretation of the Act, the State Board promulgated "the strongest and clearest possible language to protect water quality." In 1999, the State Board refined its approach and issued the RWL language that currently applies to all MS4 permits.⁶

The confusion about whether Section 301 applied to Section 402(p)(3)(B) was understandable prior to 1999 because no precedential legal decision had yet addressed the question. In 1999, however, the 9th Circuit Court of Appeals unequivocally resolved this question.⁷ The 9th Circuit held that Section 402(p)(3)(B) was unambiguous and completely replaced the requirements of Section 301 for MS4 permits. Therefore, neither the technology-based nor water quality-based requirements of Section 301 applied to MS4 permits. Because Section 402(p)(3)(B) was unambiguous, no deference to EPA's interpretation was required or permitted. Congress had spoken and its decision governed. The 9th Circuit thus held that MS4 permits issued under Section 402(p)(3)(B) did not need to include water quality-based effluent limitations that mandated strict compliance with water quality standards. In other words, the legal premise on which the State Board's RWL language was based was wrong.

B. Clarification in the State Board's 2001 BIA Order

In 2001, the State Board had the opportunity to clarify its RWL language in light of the 9th Circuit's decision in *Browner*.⁸ As the State Board acknowledged, it had not previously addressed the implications of *Browner* and the holding that MS4 permits did not need to require strict compliance with water quality standards. The State Board then properly interpreted its RWL language in a manner consistent with *Browner* and found that the language "does not require strict compliance with water quality standards." Rather, compliance with water quality standards "is to be achieved over time, through an iterative approach requiring improved BMPs."

The State Board declined to eliminate, as it could have done under *Browner*, the need to address water quality standards at all in MS4 permits in California. The State Board found that a technology-based standard alone would ignore the impacts urban runoff was having on receiving waters. The State Board thus pursued a middle course in which strict compliance with water quality standards would not generally be required, but where water quality standards would still be addressed through an iterative approach, which seeks compliance over time. This approach, the State Board found, "is protective of water quality, but at the same time considers the difficulties of achieving full compliance

⁴ State Board Order No. WQ 91-03.

⁵ State Board Order No. WQ 98-01.

⁶ State Board Order No. 99-05.

⁷ *Defenders of Wildlife v. Browner* (9th Cir. 1999) 191 F.3d 1159.

⁸ State Board Order No. 2001-15.

through BMPs that must be enforced throughout large and medium municipal storm sewer systems.”

The State Board’s 2001 precedential interpretation of the RWL language remains the State Board’s last precedential order on the subject. Had the iterative approach as articulated in the State Board’s 2001 Order been uniformly applied, many of the City’s current concerns would have been ameliorated. Such an iterative approach establishes a high bar—the ultimate achievement of water quality standards—but also recognizes the difficulties faced by MS4s in achieving those standards because of the open nature of MS4 systems, significant variability in rainfall and technical and financial feasibility.

Unfortunately, not all the Regional Boards, nor the courts and third parties applied this language uniformly. Ultimately, the RWL language was interpreted based on the original misapplication of Section 301 to MS4 permits, and was applied to require strict compliance with water quality standard, as most recently reflected in the 9th Circuit’s 2011 and 2013 decisions involving the 2001 LA permit.

C. The NRDC Case

The 9th Circuit in 2011 issued an opinion, subsequently reversed on other grounds, that interprets the State Board’s RWL language to require strict compliance with water quality standards, uncoupled from the iterative process as expressed in the State Board’s 2001 Order.⁹ The 9th Circuit’s opinion appears to turn the State Board’s 2001 precedential decision on its head. Rather than finding the iterative process to be an integral part of the State’s effort to achieve compliance with water quality standards over time through improved BMPs, the 9th Circuit held that strict compliance with water quality standards was required and was subject to independent enforcement separate from the iterative process.

The 9th Circuit’s decision appears rooted in the same misunderstanding of Section 402(p)(3)(B) and Section 301 of the Act that existed at the time of the original development of the RWL language. The 9th Circuit quoted with support from non-MS4 cases that are based on the strict application of water quality standards. For example, the 9th Circuit noted that “[o]nly by enforcing the water-quality standards themselves as the limits could the purpose of the CWA and the NPDES system be effectuated.” The 9th Circuit rejected the notion (which, of course, it previously had supported in *Browner*) that Section 402(p)(3)(B) was a “lesser standard.” The 9th Circuit reasoned that “Defendants’ position that they are subject to a less rigorous or unenforceable regulatory scheme for their storm-water discharges cannot be reconciled with the significant legislative history showing Congress’s intent to bring MS4 operators under the NPDES-permitting system.”

Although the 9th Circuit’s decision was reversed by the United States Supreme Court on other grounds, its interpretation of the RWL language was not addressed by the Supreme Court. The 9th Circuit’s decision can thus be interpreted as a fundamental shift away from the State Board’s approach in its 2001 precedential order. To make matters worse, the 9th Circuit on August 8, 2013, on remand from the Supreme Court, reconsidered its previous opinion and again held the Los Angeles Flood Control District liable for the quality of the receiving water, even though there was no evidence of a discharge of the standard exceeding pollutants from the Flood Control District’s MS4.¹⁰ The 9th Circuit’s

⁹ *Natural Resources Defense Council v. County of Los Angeles* (9th Cir. 2011), 673 F.3d 880, *rev’d on other grounds* by 133 S.Ct. 710 (2013).

¹⁰ In its 2011 opinion, the 9th Circuit had rejected the contention that the mass-emissions monitoring station data conclusively established the Flood Control District’s liability. The 9th Circuit held that there must be

new decision emphasizes even more the need for RWL reform because it appears to hold permittees liable for the quality of the receiving waters absent any evidence of an individual contribution to the problem. The City acknowledges that some at the State Board and at the various Regional Board may believe that the 9th Circuit's decisions are consistent with the current RWL language and do not reflect a change in approach. However, this position appears hard to reconcile with an objective comparison of the statements in the State Board's 2001 precedential order (in which the State Board stated that its RWL language does not require strict compliance with water quality standards) with the 9th Circuit's decisions (in which the Court held that the RWL language requires strict compliance with water quality standards, apparently even absence evidence of an individual discharge).

D. The Current Situation and the State Board's Authority to Revise the RWL Language

The 9th Circuit's decisions have resulted in significant concerns from municipal discharges, who have requested that the State Board address the issue through a reconsideration of its current RWL language. The issue has been raised directly with the State Board in connection with the Caltrans Permit and the Phase II Permit. The issue was also the crucial policy issue raised in connection with the LA Permit and the San Diego Regional Permit, both of which are subject to pending petitions to the State Board. Resolution of the RWL language issue by the State Board is the most important pending MS4 policy question.

Some have asserted that the State Board lacks the legal authority to consider changes to its current RWL language. The City believes that the State Board has discretion on the question and that neither the anti-backsliding nor the anti-degradation provisions of the Act or state law preclude the State Board from addressing the RWL language, as briefly explained below.

1. Anti-Backsliding

Some have asserted that the anti-backsliding provisions of the Act and federal regulations preclude any changes to the RWL language. A careful reading of the Act and the regulations demonstrate otherwise.

Section 402(o) of the Act provides that for specific effluent limitations established on the basis of specific sections of the Act, a permit may not be renewed or reissued that contains effluent limitations which are less stringent than the comparable effluent limitations in the previous permit. There are several reasons why Section 402(o) has no application to the RWL language.

First, the RWL language is not an "effluent limitation" as defined in the Act. An "effluent limitation" is "any restriction established by a State or the Administrator on quantities, rates, and concentrations of chemical, physical, biological, and other constituents *which are discharged from point sources* into navigable waters, the waters of the contiguous zone, or the ocean, including schedules of compliance."¹¹ An "effluent limitation" is thus a limit measured at the point of discharge from a point source. In contrast, the RWL language measures compliance in the receiving water.

some additional proof of the Flood Control District's individual contribution to the water quality exceedance. However, on August 8, 2013, the reconsidered this argument and held that the monitoring data only established liability, even absent evidence of the District's individual contribution.

¹¹ 33 U.S.C. §502(11)(Emphasis added).

Second, even if the RWL language could be characterized as an "effluent limitation," it is not (and could not be) developed in accordance with the specific sections listed in Section 402(o). It is not a technology-based effluent limitation established based on best professional judgment in accordance with Section 402(a)(1)(B). Rather, it derives its legal authority from Section 402(p)(3)(B). Moreover, as *Browner* makes clear, the RWL language is not (and could not be) a technology-based or water-quality based effluent limitation established on the basis of Section 301(b)(1)(c) because Section 301 has no application to MS4 permits. Finally, the RWL language is not an effluent limitation developed under Section 303(d) or (e), which involve the continuing planning process and TMDLs. The RWL language is, at its core, an exercise of discretion under the "such other provisions" language of Section 402(p)(3)(B)(iii) and is not subject to Section 402(o).

The federal regulations also contain anti-backsliding provisions.¹² These regulations must be addressed in NPDES permits "when applicable." Due to the unique nature of MS4s and the special standards Congress created in Section 402(p)(3)(B) for such systems, these regulations are not "applicable" to MS4 permits. The regulations provide that "interim effluent limitations, standards or conditions" of renewed or reissued permits must be at least as stringent as the final effluent limitations, standards or conditions in the previous permit. For the same reasons as discussed above regarding Section 402(o), these regulations do not apply to MS4 permits. It is commonly recognized that these regulations do not govern requirements based on state water quality standards.¹³ Because the RWL language is, at its core, intended to protect state water quality standards, these regulations have no application to the RWL language.

2. Anti-Degradation

EPA's regulations require that each state develop and adopt a statewide anti-degradation policy and identify the methods for implementing such policy.¹⁴ California adopted its anti-degradation policy in 1968.¹⁵ The State Board has issued guidance on its policy through Administrative Procedures Update ("APU") 90-004.

As APU 90-004 makes clear, the State's anti-degradation policy does not apply when a discharge "will not be adverse to the intent and purpose of the state and federal anti-degradation policies." Likewise, APU 90-004 provides that if there is "no reason to believe that existing water quality will be reduced due to the proposed action, no anti-degradation analysis is required." As noted above, revisions to the RWL language will allow MS4s through-out the State to better address water quality problems and will lead to better water quality outcomes. Thus, there is no reason to believe that revisions to the RWL language will reduce existing water quality. Therefore, the anti-degradation policy does not apply.

This analysis is consistent with recent case law regarding anti-degradation. In a recent case, the court acknowledged that the anti-degradation policy might not apply if it can be shown that the discharge of waste will not degrade the quality of the receiving water.¹⁶ To support such a conclusion, a water board must ensure that the regulatory action includes sufficient requirements, including an effective monitoring program, to

¹² 40 CFR § 122.44(I).

¹³ See, e.g., NPDES Permit Writers' Manual, page 7-4.

¹⁴ 40 CFR 131.12.

¹⁵ State Board Resolution No. 68-16.

¹⁶ *Asociacion De Gente Unida Por El Agua v. Central Valley Regional Water Quality Control Board* (2012) 210 Cal.App.4th 1255.

demonstrate that the discharge will not degrade the quality of the receiving water. MS4 permits contain such requirements, including an effective monitoring program. Therefore, the anti-degradation provisions do not apply.

III. Responses to Two Questions

With the above legal framework in mind, the City has the following responses to the two questions posed by the State Board. In the City's view, the RWL language must be amended to include a compliance program option that includes the following key elements: it must be voluntary; it must allow either a watershed or jurisdictional approach; it must permit best management practices; it must allow for prioritization of pollutant-water body combinations; it must permit adaptive management; and it must provide that good faith compliance with the program constitutes compliance with receiving water limitations and discharge prohibitions. The City's answers below are based on these key elements.

A. General Support for Compliance Approach in the LA Permit

The City generally supports the LA Permit's compliance approach as a good step toward revising the RWL language. The approach is properly an options one that allows permittees to decide whether the current language or a different approach works best for the City. It also contains sufficient rigor to provide measurable and enforceable requirements that permittees must meet. Most importantly, it provides for two different watershed or jurisdictional compliance paths that all permittees may implement. Although somewhat cumbersome, the City views the LA approach as a good first step and commends the Regional Board for its attempt to address the RWL issue. To fully address the issue, however, additional language rooted in the iterative process is required.

B. Support for CASQA's Improvements to the LA Permit's Approach

Although the City views the LA Permit's approach as a good first step, the City believes that the language requires further refinement. The City supports the RWL language put forward by CASQA in its response to the State Board's two questions as an additional step toward true RWL reform. CASQA's refinements to the LA approach makes the compliance program process more usable and comprehensive.

Moreover, the State Board should additionally consider including in the revised RWL language a mechanism to address those situations where, despite good faith efforts, achievement of water quality standards, including interim and final wasteload allocations/effluent limitations, proves to be currently infeasible. Building such a mechanism into the RWL compliance process now will avoid future disputes and will establish a comprehensive structure through which the State and Regional Boards can work collaboratively with MS4s to achieve water quality standards.

IV. Conclusion

National City appreciates the opportunity to provide these comments to the State Board and looks forward to the State Board workshop on the topic. It urges the State Board to use this opportunity to make meaningful revisions to the RWL language.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Stephen Manganiello". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping underline.

Stephen Manganiello, City Engineer

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**SWRCB/OCC FILE NOS. A-2236(a) through (kk)
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 EXHIBIT A**

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