

2017-118 AUDIT SCOPE AND OBJECTIVES

State and Regional Water Boards—Permitting

The audit by the California State Auditor will provide independently developed and verified information related to storm water treatment and management and municipal separate storm sewer system permits issued to three California regions by Regional Water Quality Control Boards (Regional Water Boards), and will include, but not be limited to, the following:

1. Review the laws, rules, and regulations significant to the audit objectives.
2. Identify the roles and responsibilities of the State Water Resources Control Board (State Water Board), Regional Water Boards, and any other relevant statewide entities involved in developing policy and providing oversight regarding storm water runoff permitting. Determine whether these entities' storm water permitting and compliance requirements are consistent with federal law and regulations, including the Clean Water Act.
3. Identify data and information used by the State Water Board, Regional Water Boards, and any other entities to allocate storm water cleanup costs and establish storm water runoff permits, permit requirements, and associated programs directed at local or regional jurisdictions. In particular, explain the history and evolution of storm water runoff permits for the Regional Water Board of Los Angeles.
4. Since 2011, for the three Regional Water Boards responsible for storm water permitting for Los Angeles County, the Central Valley, and the San Francisco Bay Area, do the following:
 - a. Determine whether the three boards' storm water permitting and compliance requirements are consistent with state and federal requirements. Identify any significant disparities and determine why those disparities exist.
 - b. Identify any significant differences in storm water permitting and compliance requirements among the three boards and determine why such differences exist and, to the extent possible, determine the impact any differences have on local jurisdictions and other parties.
 - c. To the extent possible, determine whether those responsible for storm water pollution in these three regions are also responsible for the associated costs of their pollution and the storm water permits. If not, determine whether options exist for equitably redistributing cleanup costs to those responsible. In particular, determine who has paid for storm water pollution within the jurisdiction for the Regional Water Board of Los Angeles.
 - d. For a selection of local and regional jurisdictions covered by the three boards, such as municipalities and counties, identify the fiscal and other impacts jurisdictions have had or will have in complying with storm water permits. Provide the jurisdictions' perspectives about these impacts and, to the extent possible, assess their significance.

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- e. For the selection of three or more of the local jurisdictions specified by the requester, identify current and potential funding sources for programs that target storm water cleanup and management, such as watershed management programs.
5. As part of reviewing the storm water permitting processes and policies, identify any best practices that could assist the State Water Board, Regional Water Boards, and permitted jurisdictions.
6. Review and assess any other issues that are significant to the audit.