

December 1, 2014

**SUBMITTED WITH ANNUAL REPORT**

Mr. Samuel Unger, P.E., Executive Officer  
California Regional Water Quality  
Control Board – Los Angeles Region  
320 West Fourth Street, Suite 200  
Los Angeles, CA 90013

Attention Ms. Renee Purdy

Re: **Los Angeles County NPDES Permit No. CAS004001/Board Order No. R4-2012-0175: City of Industry's Annual Statement of Legal Authority (2013-2014)**

Dear Mr. Unger and Ms. Purdy:

This office serves as the City Attorney for the City of Industry. We are submitting this statement of legal authority pursuant to Part VI.A.2.b of Order No. R4-2012-0175 ("Order") and NPDES Permit No. CAS004001 ("NPDES Permit").

The City of Industry ("City") has the legal authority to implement and enforce the requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and the Order during the reporting period of July 1, 2013 through June 30, 2014.

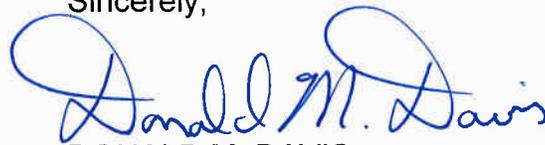
The City's legal authority to implement and enforce these requirements is derived from the provisions of Article XI of the California Constitution granting charter cities powers over municipal affairs, the City of Industry Charter, the City's general police powers under Article XI, Section 7 of the California Constitution, and more particularly, the provisions of the Industry Municipal Code, including Chapter 13.16 (Stormwater and Urban Runoff Pollution Control) and Chapter 13.17 (Standard Urban Stormwater Mitigation Plan Implementation).

The City's legal procedures available to mandate compliance with the provisions of Chapter 13.16 and 13.17 include Municipal Code sections 13.16.100 and 13.17.200, each of which deems a violation of Chapter 13.16 (including violations of the applicable provisions of the Order, the NPDES Permit and the Clean Water Act) and Chapter

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13.17, as applicable, to be a “nuisance” that can be abated and remedied administratively, or judicially, if necessary, in accordance with the enforcement procedures set forth in Industry Municipal Code Sections 13.16.090 and 13.17.200, as well as Municipal Code Chapter 1.08 (Code Violations, Penalties, Enforcement), Chapter 1.20 (Administrative Citations) and Chapter 1.30 (Public Nuisances).

Sincerely,



DONALD M. DAVIS  
DEPUTY CITY ATTORNEY

cc: Kevin Radecki, City Manager  
John Ballas, City Engineer  
Joshua Nelson, P.E., CNC Engineering, Inc.  
James Cramsie, P.E., CNC Engineering, Inc.  
Michele Vadon, City Attorney