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Ruben Martinez
Operations and Maintenance Director
City of Chico
P.O. Box 3420
Chico, CA 95927

Matt Thompson
Senior Civil Engineer
City of Chico
P.O. Box 3420
Chico, CA 95927

Re: City of Chico Municipal Separate Storm Sewer System (MS4) Compliance Audit Report

Dear Messrs. Martinez and Thompson:

Enclosed is the final audit report for the City of Chico's Storm Water Management Program (SWMP). During the week of September 23, 2009, PG Environmental, LLC, an EPA contractor, conducted an audit of the City of Chico's SWMP to evaluate compliance with Water Quality Order No. 2003-0005-DWQ for the State of California's NPDES General Permit No. CAS000004 for Storm Water Discharges from Small MS4s (Permit).

The Permit establishes minimum requirements for SWMPs to address the water quality impacts from storm water and non-storm water discharges. The audit included document reviews, interviews with City program managers and staff, as well as field verification inspections. The audit identified the following significant deficiencies by the City of Chico in the implementation of core requirements of the Permit and SWMP:

- failure to develop and implement a comprehensive and effective construction site inspection and enforcement program;
- failure to develop and implement an effective construction site plan review program;
- failure to develop and implement an adequate operation and maintenance program for municipal operations; and

- failure to adequately control airplane wash water discharges from the Chico Municipal Airport.

EPA will follow up separately with the Central Valley Regional Water Quality Control Board on the deficiencies detailed in the audit report. The final audit report will be posted on EPA's website at <http://www.epa.gov/region09/water/npdes/ms4audits.html>.

In the meantime, your staff may wish to review the case studies that EPA has developed for each of the minimum control measures to help MS4s improve their storm water management programs at <http://cfpub1.epa.gov/npdes/stormwater/casestudies.cfm>. If you have any questions, please contact Ellen Blake of my staff at (415) 972-3496 or via email at blake.ellen@epa.gov.

Sincerely,

Alexis Strauss, Director
Water Division

Enclosure:
City of Chico MS4 Compliance Audit Report

cc (w/encl):
Pamela Creedon, Executive Officer, Central Valley RWQCB
George Day, Senior Water Resources Control Engineer, Central Valley RWQCB