

Los Angeles Commercial, Industrial, and Institutional Stormwater Permit: A New Regulatory Reality

September 2026



WHAT YOU NEED TO KNOW

The Los Angeles Regional Water Quality Control Board expanded its stormwater regulations for certain commercial, industrial, and institutional properties, set to go into effect on October 31, 2026. The permit introduces new compliance obligations, stormwater planning requirements, monitoring programs, and potential infrastructure investments.

On July 23, 2026, the Los Angeles Regional Water Quality Control Board adopted a new Commercial, Industrial, and Institutional (CII) Stormwater Permit, scheduled to go into effect on October 31, 2026. Representing one of Southern California's most significant stormwater regulation expansions in decades, the permit establishes stormwater management requirements for certain privately owned properties within the Dominguez Channel/Los Angeles and Long Beach Inner Harbor Watershed and the Los Cerritos Channel/Alamitos Bay Watershed.

Unlike traditional stormwater programs, which have largely focused on industrial operations and construction activities, the CII Permit establishes a framework for regulating stormwater runoff from a much broader range of developed properties. For many organizations, this permit will introduce new compliance obligations, stormwater planning requirements, monitoring programs, and potential infrastructure investments.

With enrollment documents due within one year of the permit going into effect, organizations that may be subject to the permit should begin evaluating applicability and developing implementation strategies now.

Who Will Be Impacted?

The permit applies to certain privately owned commercial, industrial, and institutional facilities located within the specified geographic boundaries. This generally covers:

- Unpermitted facilities with five or more acres of impervious surface
- Certain facilities operating under other NPDES stormwater permits that contain five or more acres of total site area
- Facilities operating under an Industrial General Permit No Exposure Certification (NEC)
- Facilities operating under a Notice of Non-Applicability (NONA)
- Facilities where only a portion of the property is currently covered by an NPDES permit

The Los Angeles Water Board estimates that approximately **600 facilities** may require coverage under the permit.



LANGAN

Regulatory Update

Potentially affected facilities include:

- Logistics and distribution centers
- Warehouses and fulfillment centers
- Data centers
- Manufacturing and industrial facilities
- Retail centers and shopping malls
- Business parks and office campuses
- Healthcare facilities
- Educational campuses
- Research and technology campuses
- Institutional properties
- Mixed-use commercial developments

The permit also contains provisions that may impact campus-style developments and multi-parcel properties. Under the permit, a CII site may consist of a single parcel or contiguous parcels under common ownership. Campuses separated by public streets, easements, or rights-of-way may also be treated as a single regulated facility under certain circumstances. As a result, some property owners may find that what they previously viewed as separate properties are considered one regulated site for permit purposes.

For many organizations, this will be their first experience operating under an NPDES stormwater permit program.

Why Industrial Permittees Should Pay Attention

One of the most misunderstood aspects of the CII Permit is its interaction with California's Industrial General Permit (IGP).

Many facility owners assume that IGP coverage means they will not be affected by the new permit. However, the permit specifically identifies certain industrial facilities already covered under the IGP as potentially subject to additional CII Permit requirements. Facilities operating under an NEC, NONA, or facilities where only portions of the site are regulated under the IGP may be required to obtain CII Permit coverage for the remaining portions of the property.

The permit fact sheet estimates that approximately **155 industrial facilities already enrolled under the IGP** may be affected. According to the Los Angeles Water Board, EPA's residual designation specifically targets portions of industrial facilities that are not generally addressed by industrial stormwater permitting programs, including impervious areas such as parking lots, roadways, and rooftops.

This distinction reflects a fundamental shift in stormwater regulation. Historically, stormwater permitting focused on industrial activities and material exposure. The CII Permit expands that framework by recognizing that large, developed properties can generate pollutant loads through stormwater runoff, regardless of whether traditional industrial activities occur across the site.

For logistics operators, transportation companies, warehouse owners, industrial developers, and real estate investment trusts, this approach means that stormwater compliance may increasingly become a property management and infrastructure planning issue rather than an operational compliance issue.

What Compliance Will Look Like

The permit provides three pathways for achieving compliance with water quality requirements:

1. Participation in a local Watershed Management Group and funding regional watershed projects.
2. Implementation of site-specific stormwater controls designed to capture and manage runoff from the 85th percentile 24-hour storm event.
3. Direct monitoring and demonstration of compliance with permit effluent limitations.

LANGAN

Regulatory Update

For most property owners, the biggest challenges will be determining applicability, evaluating long-term compliance costs, understanding potential infrastructure needs, and identifying the compliance pathway that best aligns with business and operational objectives.

Looking Ahead

The CII Permit is the first of its kind in California and expected to influence future regulatory efforts throughout the state.

Organizations with facilities located in the Dominguez Channel or Los Cerritos watersheds should begin evaluating permit applicability now. Early planning will provide greater flexibility when assessing compliance options, budgeting for capital improvements, and developing long-term stormwater management strategies.

How Langan Can Help

The CII Permit will require organizations to look beyond permit compliance and evaluate how stormwater requirements affect facilities, infrastructure, budgets, and long-term property planning. Langan's multidisciplinary team combines expertise in stormwater permitting, environmental compliance, water resources, civil engineering, site development, and infrastructure design to help clients address these challenges from multiple perspectives. This integrated approach allows us to evaluate permit applicability, assess stormwater systems, identify practical compliance pathways, and develop solutions that align regulatory objectives with operational and business needs.

If you have questions or concerns, please reach out to your Langan project manager or:



Ryan Jorrey, PG, QISP, QSD/P
Associate
rjorrey@langan.com
213.314.8114



Danielle Sandella, CHMM
Principal
dsandella@langan.com
203.784.3056