



Los Angeles Regional Water Quality Control Board

January 9, 2024

Via Email Only

Permittees of the Upper Santa Clara River CIMP Group¹

APPROVAL OF THE UPPER SANTA CLARA RIVER GROUP'S COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO PART III IN ATTACHMENT E OF THE REGIONAL MUNICIPAL SEWER SYSTEM (MS4) WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR THE LOS ANGELES REGION (NPDES PERMIT NO. CAS004004; ORDER NO. R4-2021-0105)

Dear Permittees of the Upper Santa Clara River CIMP Group:

The Regional MS4 Permit (Order No. R4-2021-0105) authorizes discharges from the MS4 operated by 99 municipal Permittees within the coastal watersheds of Los Angeles and Ventura Counties (hereafter, Regional MS4 Permit or Order). The Regional MS4 Permit requires Permittees to implement an Integrated Monitoring Program (IMP) or a Coordinated Integrated Monitoring Program (CIMP) as set forth in the Monitoring and Reporting Program (Attachment E of the Order) hereafter, MRP.

Pursuant to Part III.D.1.a of the MRP, the Upper Santa Clara River CIMP Group (Group) submitted a revised draft CIMP by the March 13, 2023 deadline for approval by the Executive Officer of the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board).

Public Review and Comment

On March 17, 2023, the Board, provided public notice and a 60-day period to allow for public review and comment on all new or updated monitoring programs submitted by March 13, 2023. The Board received one joint comment letter from Heal the Bay, Natural Resources Defense Council (NRDC), and Los Angeles Waterkeeper. These comments were considered during the Board's review of the IMPs and CIMPs.

Board's Review

Los Angeles County Permittees were required to update and/or develop a monitoring program pursuant to Part III of the MRP. On April 6, 2023, Board staff provided comments to the Group requesting revisions to the CIMP. To discuss these comments,

¹ Permittees of the Upper Santa Clara River CIMP Group include the County of Los Angeles, Los Angeles County Flood Control District, and the City of Santa Clarita.

the Group met with Board staff on June 5, 2023, July 6, 2023, and August 3, 2023. The Group submitted a revised CIMP on August 30, 2023. On September 6, 2023, Board staff provided additional comments to the Group requesting revisions to the CIMP. The Group submitted the final CIMP on September 22, 2023.

The Los Angeles Water Board has reviewed the Group's CIMP dated September 2023 and has determined that it is consistent with applicable requirements in the MRP, monitoring provisions in applicable TMDLs, and specifically, with Attachments K through S of the Order. Note that, if applicable, the review of the CIMP did not include a review of any Trash Monitoring and Reporting Plans and/or Plastic Pellet Monitoring and Reporting Plans.

Santa Clara River Estuary and Reaches 3, 5, 6, and 7 Indicator Bacteria TMDL

Per Part IV in Attachment M of the Order, the dry weather final compliance deadline for *E. coli* Water Quality-Based (WQBELs) and Receiving Water Limitations (RWLs) is March 21, 2023. The WQBELs and RWLs are expressed as final annual allowable exceedance days of the single sample objectives based on daily and weekly sampling.

The Group's CIMP dated September 2023 proposes a sampling frequency of monthly dry weather receiving water sampling (at sites SNTCLR_5_RE, SNTCLR_6_ME, and SNTCLR_7_RA) and 2 dry weather events per year sampling at the non-stormwater outfall (PD 2507). Based on the proposed sampling frequency in the Group's CIMP, the Los Angeles Water Board has translated the applicable dry weather allowable exceedance days for Santa Clara River Reaches 3 and above as follows:

Monthly dry weather receiving water sampling allowable exceedance days (RWL):

$$\frac{284 \text{ days}}{365 \text{ days}} = \frac{x1}{12 \text{ mont hs}} \Rightarrow x1 = 9.34 \Rightarrow 1.6\% \times 9.34 = 0.15 \approx 1 \text{ day}$$

2 dry weather events per year non-stormwater outfall sampling allowable exceedance days (WQBEL):

$$\frac{284 \text{ days}}{365 \text{ days}} = \frac{x2}{2 \text{ per year}} \Rightarrow x2 = 1.56 \Rightarrow 1.6\% \times 1.56 = 0.02 \approx 0 \text{ day}$$

Additionally, we note that for the stormwater outfall sites PD 2443, PD 0717, and PD 0494, the Group's CIMP dated September 2023 proposes no dry weather sampling but includes a footnote that "This will be the initial monitoring frequency for this permit term. The monitoring frequency will change to weekly in November 2028 to evaluate attainment of the geometric mean WQBELs."

Approval

The Los Angeles Water Board hereby approves the Group's CIMP, dated September 2023. Pursuant to Part III.D.1.c of the MRP, **the Group shall implement their approved CIMP immediately**. An approval of the Group's CIMP does not constitute an approval of any unapproved Trash Monitoring and Reporting Plans and/or Plastic Pellet Monitoring and Reporting Plans that were included in the CIMP, if applicable.

Monitoring Program Modifications

Pursuant to Part II.F of the MRP, if the Permittee(s) wish to modify any monitoring requirements in their approved Monitoring Program (e.g., reduce or eliminate monitoring of specified pollutants, reduce monitoring frequencies, change monitoring locations), then the Permittee(s) shall submit a written request to the Executive Officer of the Los Angeles Water Board for approval prior to making any modifications. This provision may be waived if the Los Angeles Water Board determines that the modification is (a) minor and (b) does not otherwise violate any applicable provision of law.

Additionally, pursuant to Part III.D.1.d of the MRP, if there is any change in membership of Permittees participating in an approved CIMP (e.g., Permittee in an IMP joining a CIMP, Permittee dropping out of the CIMP), that Permittee shall notify the Los Angeles Water Board promptly. The affected Permittee(s) shall then revise/develop their monitoring program as directed by the Los Angeles Water Board.

If you have any questions about this letter, please contact Ms. Erum Razzak with the Municipal Stormwater Permitting Unit by email at Erum.Razzak@waterboards.ca.gov or by phone at (213) 620-2095. Alternatively, you may also contact Ivar Ridgeway, Municipal Stormwater Permitting Unit Supervisor by email at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

for Susana Arredondo
Executive Officer

cc: Jerrid Mckenna, City of Santa Clarita
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