November 20, 2014

East San Gabriel Valley Watershed Management Group
(See Distribution List)

REVIEW OF THE EAST SAN GABRIEL VALLEY GROUP'S COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO PART VI.B AND ATTACHMENT E, PART IV.B OF THE LOS ANGELES COUNTY M UNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear East San Gabriel Valley Watershed Management Group:

The Regional Water Board has reviewed the Coordinated Integrated Monitoring Program submitted on June 27, 2014 by the East San Gabriel Valley Watershed Management Group (the Group). This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop and implement, in coordination with an approved Watershed Management Program per Part VI.C, a customized monitoring program that achieves the five Primary Objectives set forth in Part II.A of Attachment E and includes the elements set forth in Part II.E of Attachment E. Customized monitoring programs may be developed on an individual jurisdictional basis, referred to as an Integrated Monitoring Program (IMP), or a on watershed basis, referred to as a Coordinated Integrated Monitoring Program (CIMP). These programs must be approved by the Executive Officer of the Regional Water Board.

The Regional Water Board has reviewed the Group's CIMP and has determined that, for the most part, the CIMP includes the elements set forth in Part II.E and will achieve the Primary Objectives set forth in Part II.A of Attachment E of the LA County MS4 Permit. However, some additions and revisions to the Group's CIMP are necessary. The Regional Water Board's comments on the CIMP, including detailed information concerning necessary additions and revisions to the CIMP, are found in Enclosure 1 and Enclosure 2.

Please make the necessary additions and revisions to the CIMP as identified in the enclosures to this letter and submit the revised CIMP as soon as possible and no later than **February 18, 2015**. The revised CIMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised East SG Valley Coordinated Integrated Monitoring Program" with a copy to Ivar.Ridgeway@waterboards.ca.gov.

Upon approval of the revised CIMP by the Executive Officer, the Group must prepare to commence its monitoring program within 90 days. If the necessary revisions are not made, the

Group must comply with the Monitoring and Reporting Program (MRP) and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the Group's CIMP is approved by the Executive Officer, the monitoring requirements pursuant to Order No. 01-182 and Monitoring and Reporting Program CI 6948, and pursuant to approved TMDL monitoring plans shall remain in effect for the Cities of Claremont, La Verne, Pomona and San Dimas.

If you have any questions, please contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures:

Enclosure 1 – Summary of Comments and Necessary Revisions to CIMP
Enclosure 2 – Comments on Aquatic Toxicity Monitoring
East San Gabriel Valley Watershed Management Group Distribution List

cc: Bronwyn Kelley, PG, Project Manager MWH

ENCLOSURE 1
SUMMARY OF COMMENTS AND NECESSARY REVISIONS TO CIMP
EAST SAN GABRIEL VALLEY WATERSHED MANAGEMENT GROUP

CIMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
Section 1	Table 1-4	The revised CIMP should be updated with description of the SGR Metals TML Implementation Plan adopted by the Regional Water Board, which became effective on October 13, 2014. See http://63.199.216.6/larwqcb_new/bpa/docs/R13-004/R13-004_RB_BPA.pdf
Section 2	TMDL Monitoring	The CIMP appropriately includes coordination with other parties regarding monitoring of other impaired waterbodies, including in Puddingstone Reservoir and at the mouth of the San Gabriel River as required by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL). For Pomona and Claremont, the CIMP appropriately references monitoring in the Middle Santa Ana River, as required by the Middle Santa Ana River Bacterial Indicator TMDL, and provides links in Attachment A to both cities' Comprehensive Bacteria Reduction Plans developed pursuant to this TMDL.
Section 2 Table 2-1	Frequency of sampling; Aquatic Toxicity	Table 2-1 presents the proposed monitoring parameters and frequency of sampling during wet/dry weather events. For San Jose Creek Reach 2, the wet weather monitoring for metals should be increased to 4x/year to be consistent with SGR metals TMDL. Reach 2 is considered a tributary to the downstream impaired Reach 1. Wet-weather monitoring results from the first year may be evaluated to determine whether reducing the frequency to 3x/year would still provide sufficient data. The ESGV WMG may request a reduction in frequency on the basis of this data evaluation. For Live Oak Wash, the wet-weather monitoring for organochlorine compounds should be increased to 3x/year. Dry weather monitoring for nutrients should be included at a frequency of 2x/year. Live Oak Wash is considered an input to Puddingstone Reservoir. Aquatic toxicity monitoring in the receiving water is required two times per year during wet weather conditions and once per year during dry weather conditions. This applies to San Jose Creek Reach 2, San Dimas Wash and Walnut Creek Wash. See Enclosure 2 for more detailed comments on aquatic toxicity monitoring. (See Attachment E, Parts VI.C.1.d.vi and VI.D.1.c.vi.)
Section 3	MS4 Database	We appreciate the WMG providing GIS files as part of the draft submittal. Section 3.2 states that information on dry weather diversions was included in database; however, we did not find a map in the draft submittal. The revised CIMP should include a map of the stormwater outfall dry weather diversions, if they exist. If not, then please explain. Updated GIS files should be included in the revised

CIMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		submittal, if necessary.
Section 4 Table 4-6	Outfall-based Stormwater Monitoring	The table should be modified to show monitoring of parameters identified for the San Dimas Wash stormwater outfall site will occur three times per year.
Section 4	Representative-ness of outfall site	Table 4-2 shows the land uses associated with each HUC-12 subwatershed. We note there are some slight differences between the residential land use percentages of stormwater outfall sites, which show a higher portion of residential land use than the HUC-12 distribution. The overall land us distributions within the Big Dalton Wash and Upper San Jose Creek HUC-12 area, in particular, have significantly more Commercial/Industrial land use than the corresponding outfall drainages. While this may be acceptable, additional support for the representativeness of the two outfall locations relative to their larger HUC-12 areas should be included in the revised CIMP.
Section 5.2	Non-stormwater outfall screening	The revised CIMP needs to clarify the initial screening process by providing more detail on the three initial screenings (time between each screening, including assurance that potential seasonality in non-stormwater discharges is captured by the initial three screenings) and providing clarity regarding whether a fourth screening would occur for outfalls where dry weather flow is considered to be significant. Table 5-2 in the revised CIMP should more clearly define how the Permittees will determine what constitutes a "significant non-stormwater discharge" pursuant to Attachment E, Part IX.C.1.a-e.
Section 9	Wet Weather and dry weather Monitoring	The CIMP defines wet weather incorrectly as the period between October 1 and April 15. Instead, wet weather should be defined consistent with the SGR Metals and Selenium TMDL, i.e., when the maximum daily flow in Reach 2 of the SGR is greater than or equal to 260 cfs. Similarly the CIMP should include definition of dry weather and be consistent with the approved TMDLs.
Section 12	CIMP schedule	The implementation schedule (pg. 70) should be modified to identify which receiving water and outfall sites will be projected to be installed within this permit term. The Regional Water Board supports early installation of the LTA receiving water site. Regarding the installation of other sites, the installation of sites to assess compliance with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL should occur in time to conduct monitoring prior to the first interim compliance deadlines for wet and dry weather of September 2017.

ENCLOSURE 2
COMMENTS ON AQUATIC TOXICITY TESTING
EAST SAN GABRIEL VALLEY CIMP

Part XII.G.1. (Page E-30) and Part XII.G.2. (Page E-30) of the Monitoring and Reporting Program states that Permittees shall conduct aquatic toxicity monitoring utilizing the critical life stage chronic toxicity test methods listed. The draft CIMP does not propose use of critical life stage chronic toxicity test methods for assessment of toxicity in wet weather samples and instead proposes use of acute toxicity test methods. This is not acceptable; the appropriate chronic toxicity test method listed in the MRP must be used and both survival and sublethal endpoints must be reported. We suggest the group consult the State Water Resources Control Board 2011 publication, "Implementation Guidance: Toxicity Testing for Stormwater" to gain insight on how to run chronic toxicity tests on wet weather samples.

Part XII.I.1. (Page E-33) of the Monitoring and Reporting Program states that a toxicity test sample is immediately subject to TIE procedures if either survival or sublethal endpoints demonstrate a Percent Effect value equal to or greater than 50% at the Instream Waste Concentration. The draft CIMP does not propose to perform a TIE when at least a 50% sublethal effect is seen but instead proposes to first collect a confirmatory sample two weeks later.

This is not an acceptable approach. The CIMP seems to be implying that chronic toxicity has some inherent non-persistent quality to it that makes the results unreliable. It also implies that chronic toxicity is of lesser importance. Although it would be hard to generalize to all possible situations, the fact that a large number of invertebrates (or fish) living in a receiving water can survive an ambient pollutant concentration but are impacted in terms of growth or reproduction means that the population as a whole will be impacted, and could eventually collapse. Some species living in the receiving water have very short lifespans and during critical times of the year may be prey for other organisms that will in turn be impacted by their population decline.

Additionally, the toxicity flowcharts do not show the need to proceed to outfall toxicity testing should a TIE of a toxic receiving water sample be inconclusive and instead places focus on the response to non-persistent toxicity. While development of the proposed Discharge Assessment Plan (DAP) will be useful, it cannot take the place of the required outfall toxicity monitoring following an inconclusive TIE in the receiving water. And, while there may be situations where TIEs cannot be resolved due to non-persistent toxicity and no further action on that sample can be pursued, inconclusive TIEs often result from a lack of following well-defined procedures rather than non-persistent toxicity. As mentioned elsewhere in this comment letter, including pyrethroids in the TIE procedure will reduce the occurrence of inconclusive TIEs as will including chemical testing for Fipronil and its degradates for comparison to U.S. EPA benchmarks.

We strongly recommend a more cohesive approach whereby the Group would develop a Toxicity Assessment Plan analogous to the Discharge Assessment Plan currently proposed in the CIMP.

Suggested Special Study: The 2013 study released by the California Stormwater Quality Association (CASQA) entitled "Review of Pyrethroid, Fipronil and Toxicity Monitoring Data from California Urban Watersheds" reviewed stormwater data from studies conducted during 2005 - 2012 and highlighted the toxicity impacts from use of pesticides not currently required to be monitored for by the MRP. We suggest the group begin monitoring for these chemicals in the receiving water and, in addition, assess toxicity using the 2002 acute toxicity testing protocol (EPA-821-R-02-012) with the amphipod *Hyalella azteca* as the test organism. *Hyalella* is known to be much more sensitive to pyrethroids than is *Ceriodaphnia* while the latter is useful for its sensitivity to OP pesticides. The two species together may also prove to be more useful in detecting toxicity from fipronil. And, should 50% or greater effect be detected in the toxicity test, we suggest a procedure to incorporate pyrethroids into the subsequent TIE be documented (three possible treatments have been identified by researchers, see http://www.pubfacts.com/detail/20018342/Focused-toxicity-identification-evaluations-to-rapidly-identify-the-cause-of-toxicity-in-environment). While fipronil does not have a TIE procedure identified currently, chemical testing for the parameter (and degradates) and comparison to U.S. EPA Office of Pesticide Program's aquatic life benchmarks at http://www.epa.gov/oppefed1/ecorisk_ders/aquatic_life_benchmark.htm will aid in determining the cause(s) of toxicity in order to follow up with outfall testing of the parameter(s) with the ultimate goal of removing the source. This approach will also help minimize inconclusive TIE results which would lead to required toxicity testing in a representative upstream outfall.

EAST SAN GABRIEL VALLEY WATERSHED WMP

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