



Los Angeles Regional Water Quality Control Board

April 17, 2024

Via Email Only

Permittees of the Ballona Creek Watershed CIMP Group¹

APPROVAL OF THE BALLONA CREEK WATERSHED GROUP'S COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO PART III IN ATTACHMENT E OF THE REGIONAL MUNICIPAL SEPARATE STORM 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 Ballona Creek Watershed 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 Ballona Creek Watershed Management 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 Los Angeles Water 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.

¹ Permittees of the Ballona Creek Watershed Management Group include the County of Los Angeles, Los Angeles County Flood Control District (LACFCD), and the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, and West Hollywood.

NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

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 May 3, 2023, Board staff provided comments to the Group requesting revisions to the CIMP. To discuss these comments, the Group met with Board staff on July 12, 2023. As a follow-up to the meeting, Board staff provided clarification on the previous comments and additional comments to the Group on August 8, 2023 and August 30, 2023 requesting revisions to the CIMP. The Group submitted a revised CIMP on October 30, 2023. On November 29, 2023, Board staff requested additional edits to the CIMP to fully address the comments provided earlier. The final CIMP was received on January 26, 2024.

Per the final CIMP, if the Group opts to do a *E. coli* – Fecal coliform translator study for Ballona Creek Reach 1, the Group will submit the results of the translator study to the Regional Board, summarize the results in the CIMP, revise the CIMP to specify the translator, and monitor *E. coli* as the surrogate to fecal coliform. If the translator study is not completed, samples will only be analyzed for fecal coliform. Additionally, after the completion of the Ballona Creek Estuary's aquatic toxicity test species sensitivity screening, the CIMP will be updated to include the results and specify the selected most sensitive species that will be used to monitor aquatic toxicity for the Ballona Creek Estuary, and monitoring for aquatic toxicity will commence.

The Los Angeles Water Board has reviewed the Group's CIMP dated January 26, 2024 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.

Approval

The Los Angeles Water Board hereby approves the Group's CIMP, dated January 26, 2024. 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(s) dropping out of the CIMP), the Permittee(s) affecting the change 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: Josette Descalzo, City of Beverly Hills
Sean Singletary, City of Culver City
Barmeshwar Rai, City of Inglewood
Lauren Amimoto, City of Inglewood
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