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## Los Angeles Regional Water Quality Control Board

November 7, 2023

Via Email Only

Mr. Clint Osorio  
City Manager  
1700 West 162nd Street, Room 112  
Gardena, CA 90247-3778

**APPROVAL OF THE CITY OF GARDENA'S 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 Clint Osorio:

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.b of the MRP, the City of Gardena (City) submitted a draft IMP 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 May 22, 2023 and June 6, 2023, the Board

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NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

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provided comments to the City requesting revisions to the IMP. The City submitted a revised IMP on July 21, 2023. On July 25, 2023, the Board provided additional comments to the City requesting revisions to the IMP. The City submitted a 2<sup>nd</sup> revised IMP on August 3, 2023. On August 4, 2023, the Board requested an additional minor edit to the IMP to fully address the comments provided earlier. The final IMP was received on August 30, 2023.

The Los Angeles Water Board has reviewed the City's final IMP received on August 30, 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.

### **Approval**

The Los Angeles Water Board hereby approves the City's IMP, received on August 30, 2023. Pursuant to Part III.D.1.c of the MRP, **the City shall implement their approved IMP immediately.**

### **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 Permittees participating in an approved CIMP (e.g., Permittee in an IMP joining a CIMP, Permittee dropping out of the CIMP), the Permittee(s) revising their participation shall notify the Los Angeles Water Board promptly. The 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](mailto: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](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,

for Susana Arredondo  
Executive Officer

cc: Allan Rigg, Director of Public Works  
Kevin Kwak, Assistant Public Works Director  
Hong Lee, Program Coordinator