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## Los Angeles Regional Water Quality Control Board

April 30, 2024

Via Email Only

Tom Weiner  
City Manager  
City of Walnut  
21201 La Puente Road  
Walnut, CA 91789

**FINAL APPROVAL OF THE CITY OF WALNUT WATERSHED MANAGEMENT PROGRAM (WMP) PURSUANT TO 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 Mr. Weiner:

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 allows Permittees the option to use a Watershed Management Program (WMP) to implement many of the permit's requirements through customized strategies, control measures, and best management practices (BMPs).

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board), approved with conditions, the City of Walnut's (City) WMP on April 28, 2023. The conditional approval letter directed the City to submit a final WMP that satisfies all the conditions listed in the letter no later than July 31, 2023. On June 21, 2023, the City requested an extension to submit its revised WMP by August 31, 2023. On July 24, 2023, the Los Angeles Water Board granted the extension to submit the revised WMP. On August 31, 2023, the City submitted a WMP that proposed an alternative approach for approval. The Los Angeles Water Board sent an email on September 21, 2023, providing comments and requested revisions for approval and subsequently met with the City on October 10, 2023, to discuss staff's comments on the updated WMP. The Los Angeles Water Board received the City's Final WMP on October 27, 2023.

After review of the City's final WMP the Los Angeles Water Board has determined that the City's WMP, dated October 27, 2023, is consistent with the requirements of the Regional MS4 Permit. The Los Angeles Water Board hereby approves the City's WMP, dated October 27, 2023. Pursuant to Parts IX.C.1 and IX.G.3.c of the Order, the City of

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NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

Walnut **shall implement their approved WMP immediately**. The City of Walnut is subject to all applicable compliance schedules in Part IV.B and Attachments K through S of the Order.

**Compliance Metric:** Pursuant to Part IX.B.7.h of the Order, the WMP is required to specify the expected volume capture, load reductions, or other compliance metric(s) at regular milestones, and the methods by which these reductions will be measured and demonstrated for each waterbody pollutant combinations (WBPCs) and supported via the Reasonable Assurance Analysis (RAA). Based on the information provided in the WMP, dated October 27, 2023, the Los Angeles Water Board will determine deemed compliance with the City of Walnut's WMP based on the following compliance metric(s) per the approved compliance schedule:

- Project based, per Section 6, *Compliance Schedule*, of the WMP, dated October 27, 2023

The City must demonstrate compliance with final WQBELs through the direct demonstration of compliance options outlined in Part X.B.2.a of the Order or demonstrate that structural BMPs retain all non-stormwater runoff and the volume of stormwater runoff generated from the 85th percentile 24-hour storm event.

**Deemed Compliance:** The following WBPCs will receive deemed compliance through the WMP if the actions and schedules specified in the WMP are attained as outlined in Parts X.B.1.b and X.B.2.b of the Order:

- Dry weather *E. coli* and Total Dissolved Solids until June 14, 2026
- Wet Weather *E. coli* until June 14, 2036

Trash WBPCs are not eligible for deemed compliance under the WMP. For Trash WBPCs, compliance shall be determined as outlined in Part X.C of the Order. Any WBPCs that are not listed above are not eligible for deemed compliance for the following reasons: (a) for Category 1 WBPCs with interim deadlines, the WMP proposes watershed control measures for which there are no quantitative analyses that satisfy the RAA requirements, (b) the final TMDL deadline(s) have passed and there is no approved Time Schedule Order (TSO) nor retention of all non-stormwater runoff and the volume of stormwater runoff from the 85th percentile 24-hour storm event, (c) the WMP only proposes the implementation of baseline Permit requirements, and/or (d) the WMP does not propose implementing additional structural BMPs and proposes to demonstrate compliance through monitoring.

**Adaptive Management:** Pursuant to Part IX.E.1 of the Order, the Permittee(s) shall implement an adaptive management process for each approved WMP. An adaptive management process is a periodic, comprehensive program evaluation, including re-analysis of data and/or modeling, and modification process to determine progress toward achieving WQBELs and receiving water limitations and to adapt the Watershed Management Program to become more effective at achieving WQBELs and receiving

water limitations. Pursuant to Part IX.E.4 of the Order, Permittee(s) shall submit the results of the adaptive management process with the Permittees' Report of Waste Discharge (ROWD) to the Los Angeles Water Board no later than **March 15, 2026**.

Per Part IX.E.3 of the Order, the adaptive management process fulfills the requirements in Part V.D of the Order to address continuing exceedances of receiving water limitations.

**Modifications:** The City may propose WMP modifications at any time during the term of the Order, as necessary. The City shall provide a standalone written request explaining the nature of the proposed modification(s) and justification for consideration by the Los Angeles Water Board. Such justification may include the need to align the timing of implementation for a specific project with a project partner that is not regulated by the Regional MS4 Permit.

If you have any questions about this letter, please contact Jessica Pearson with the Municipal Stormwater Permitting Unit by email at [Jessica.Pearson@waterboards.ca.gov](mailto:Jessica.Pearson@waterboards.ca.gov) or by phone at (213) 576-6786. 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: Jamie Bumia, City of Walnut  
Melissa Barcelo, City of Walnut  
Annelisa Ehret Moe, Heal the Bay  
Benjamin Harris, LA Waterkeeper  
Corinne Bell, Natural Resources Defense Council