



Los Angeles Regional Water Quality Control Board

October 27, 2014

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

REVIEW OF THE EAST SAN GABRIEL VALLEY WATERSHED MANAGEMENT GROUP'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL 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 draft WMP that the East San Gabriel Valley Watershed Management Group (ESGV WMG) submitted on June 27, 2014 for the East San Gabriel Valley Watershed Management Area. The participants of the ESGV WMG are the Cities of Claremont, La Verne, Pomona and San Dimas (the ESGV Cities). 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 either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County Permit and must be approved by the Regional Water Board.

As stated above, on June 27, 2014, the ESGV WMG submitted a draft Watershed Management Program (WMP) for the East San Gabriel Valley Watershed Management Area (WMA) to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of LA County MS4

Permit. However, some revisions to the ESGV Cities' draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2, respectively. The specific Permit provisions cited in the enclosures refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which revisions to the draft WMP can be addressed (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Water Board comments, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program.

Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than January 27, 2015.

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft East SGV WMP" with a copy to lvar.Ridgeway@waterboards.ca.gov.

If the necessary revisions are not made, the ESGV Cities will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment Q pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft East SGV WMP is approved, the Cities are required to:

- (a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
- (b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii);
- (c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters; and
- (d) Implement watershed control measures, where possible from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash water quality-based effluent limits (WQBELs) and all other WQBELs and receiving water limitations by the applicable compliance deadlines occurring prior to approval of a WMP.

In addition on June 27, 2014, the East San Gabriel Valley River Watershed Management Group submitted a draft Coordinated Integrated Monitoring Program (CIMP) for the East San Gabriel WMA to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

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,



Chief Deputy E.O.

Samuel Unger, P.E. *for*
Executive Officer

Enclosures:

Attachment 1 Comments and Necessary Revisions to Draft WMP
Attachment 2 Comments on Reasonable Assurance Analysis for the East San Gabriel
Valley Watershed Management Group

cc: Bronwyn Kelley, PG, Project Manager MWH

Los Angeles Regional Water Quality Control Board

Attachment to October 27, 2014 Letter Regarding the East San Gabriel Valley
Watershed Management Group's Draft Watershed Management Program (WMP) Submittal Pursuant
to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Comments and Necessary Revisions to Draft WMP

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
<p>Part VI.C.5.a.ii. Waterbody-Pollutant Classification (page 59)</p>	<ul style="list-style-type: none"> Greater detail on the water quality characterization, including (1) a map of the locations of the monitoring sites for each of the four sources of data identified on page 7 relative to the watershed management area, and (2) a tabular summary of the data should be provided. In Section 5.1.4, the data used to establish existing concentrations should be described in more detail and presented in tabular form. Additionally, Table 5-2 appears to omit from the analysis San Jose Creek. Discharges to San Jose Creek are subject to a dry-weather water quality-based effluent limitation (WQBEL) for selenium; therefore, data on existing concentration should be included for San Jose Creek. The MS4 permit requires WMPs to include the applicable WQBELs for every approved TMDL within the WMA. The draft WMP does not include the WQBELs for Puddingstone Reservoir for total phosphorus and total nitrogen, total mercury, and PCBs, chlordane, dieldrin, total DDT and 4,4-DDT. The WMP needs to address all applicable WQBELs to comply with provisions of Part VI.E and Attachment P related to the Los Angeles Lakes TMDLs (specifically, Puddingstone Reservoir for nitrogen, phosphorus, mercury, PCBs, chlordane, dieldrin and DDT compounds). Attachment P identifies wasteload allocations for each of the four municipalities in the ESGV WMG and states these are to be measured at the point of discharge into the receiving waters. Also, if implementation will take more than one year, then interim milestones and dates for their achievement must also be included. The WMP needs to specify the applicable receiving water limitations for Category 3 waterbody-pollutant combinations (WBPCs).
<p>Part VI.C.5.a.iv. Prioritization (page 60)</p>	<ul style="list-style-type: none"> The WMP needs to provide a clear schedule that demonstrates implementation of the BMPs will achieve the required interim metal reductions by the compliance deadlines. Whereas Tables 5-6 through 5-9 present the type of structural BMPs to be implemented by each City, there are no specific dates for installation; the WMP schedule should describe timelines through 2022.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
<p><i>Part VI.C.5.b. Selection of Watershed Control Measures (pages 61- 64)</i></p>	<ul style="list-style-type: none"> • The WMP proposes to increase frequency of construction site inspections although this appears to apply only for City of San Dimas. The WMP should either increase such frequency for other Cities or provide rationale for no changes for the other cities of the ESGV WMG. The WMP also proposes to require inventory of existing developments for future BMP retrofits; however no timeframe is included. • The draft RAA addresses WBPCs for the San Gabriel Metals TMDLs; however the RAA does not address activities and control measures to address selenium in San Jose Creek Reach 2, nor pollutants in the Puddingstone Reservoir TMDLs. Greater clarity should be provided on the volume based approach taken by the ESGV WMG. • Activities and control measures for Category 3 WBPCs for Walnut Creek Wash and San Gabriel River Reach 2 and Reach 3 are not included. To the extent that the group intends to address these through the volume based approach, this should be more clearly stated in the WMP. • The RAA identifies potential areas for green street conversion and assumes a 30% conversion of the road length in the suitable areas; however, the specific locations and projects are not identified. Although it may not be possible to provide detailed information on specific projects at this time, the WMP should at least specify the number of projects needed to ensure timely compliance with permit requirements. • The draft WMP assumes a 10% pollutant reduction from new non-structural controls. Although 10% is a modest fraction of the overall controls necessary, additional support for this assumption should be provided, or as part of the adaptive management process, the Permittees could commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not warranted. •

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
<p><i>Part VI.C.5.b.iv.(5) Reasonable Assurance Analysis (pages 63-64)</i></p>	<ul style="list-style-type: none"> • The draft WMP, including the RAA, excludes stormwater runoff from “non-MS4” facilities within the WMA from the stormwater treatment target. In particular, industrial facilities that are permitted by the Water Boards under the Industrial General Permit or an individual stormwater permit were identified and subtracted from the treatment target. <p>Regional Water Board staff recognizes that this was done with the assumption that these industrial facilities will retain their runoff and/or eliminate their cause/contribution to receiving water exceedances, as required by their respective NPDES permit. However, it is important that the Group’s actions under its Industrial/Commercial Facilities Program—including tracking critical industrial sources, educating industrial facilities regarding BMP requirements, and inspecting industrial facilities—ensure that all industrial facilities are implementing BMPs as required.</p> <ul style="list-style-type: none"> • The draft WMP, including the RAA, takes a similar approach for areas under the jurisdiction of the California Department of Transportation (Caltrans). Caltrans facilities that are permitted under the Caltrans MS4 permit (Order No. 2012-0011-DWQ) were also identified and subtracted from the treatment target. <p>It should be noted that the Amendment to the Caltrans Permit (Order WQ 2014-0077-DWQ) includes provisions to address TMDL requirements throughout the state. Revisions to Attachment IV of the Caltrans Permit require that Caltrans prioritize all TMDLs for implementation of source control measures and BMPs, with prioritization being “consistent with the final TMDL deadlines to the extent feasible.”</p> <p>Additionally, the Caltrans Permit also includes provisions for collaborative implementation through Cooperative Implementation Agreements between Caltrans and other responsible entities to conduct work to comply with a TMDL. By contributing funds to Cooperative Implementation Agreements and/or the Cooperative Implementation Grant Program, Caltrans may receive credit for compliance units, which are needed for compliance under the Caltrans Permit.</p> <p>In a similar manner, the LA County MS4 Permit includes provisions for Permittees to control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other MS4 owners—such as Caltrans—to successfully implement the provisions of the Order (see Parts VI.A.2.a.viii and VI.A.4.a.iii). Therefore, the Group should ensure that it is closely</p>

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
	coordinating with appropriate Caltrans District staff regarding the identification and implementation of watershed control measures to achieve water quality requirements (i.e. applicable Receiving Water Limitations and WQBELs).

Los Angeles Regional Water Quality Control Board

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

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 24, 2014

SUBJECT: COMMENTS ON SECTION 5, REASONABLE ASSURANCE ANALYSIS AND
WATERSHED CONTROL MEASURES OF THE DRAFT WATERSHED
MANAGEMENT PROGRAM FOR THE EAST SAN GABRIEL VALLEY
WATERSHED MANAGEMENT AREA

This memorandum contains comments on Section 5, Reasonable Assurance Analysis of the draft Watershed Management Program (WMP), dated June 27 2014, which was submitted by the East San Gabriel Valley Watershed Management Group.

A. General comments on the draft Reasonable Assurance Analysis (RAA) section of the Watershed Management Program.

The required reductions for dry weather were calculated based on the median and the 90th percentile existing concentrations in Section 5.1.4 of the WMP. Specific required reductions for Thompson Creek, San Dimas, and Puddingstone Reservoir were listed in Table 5-2 on page 42 of the draft WMP. However, the required reductions for dry weather for San Jose Creek were not included in the table. The WMP should be revised to include the required reductions for identified priority pollutants for San Jose Creek.

B. Modeling comments regarding analysis of runoff volumes based on the 85th percentile, 24-hour design storm:

1. The predicted runoff volumes presented in Figure 5-12 and Table 5-1 should be presented and explained in more detail to provide clarity on how those values were obtained from the hourly model output results of runoff volume over the 24-hour design event for each subwatershed or city-subwatershed.
2. The report did not describe how the model was calibrated, including calibration results compared to calibration criteria in Table 3.0 of the RAA Guidelines, and no historical hydrology data were used for comparison with the model results for the baseline prediction. According to Part G, pages 12-13 of the RAA Guidelines, model calibration is necessary to ensure that the model can properly assess all the variables and conditions in a watershed system. The hydrology calibration is particularly important in the case of the East San Gabriel Valley RAA, since the group is used a volume-based approach.

3. The report presents the existing runoff volumes and required volume reductions to achieve the 85th percentile, 24-hour volume retention standard for each watershed area. The report needs to present the same information, if available, for non-stormwater runoff. Alternatively, the report should include a commitment to collect the necessary data in each watershed area, through the non-stormwater outfall screening and monitoring program, so that the model can be re-calibrated during the adaptive management process to better characterize non-stormwater flow volumes and to demonstrate that proposed volume retention BMPs will capture 100 percent of non-stormwater that would otherwise be discharged through the MS4 in each watershed area.
4. The index of subwatersheds shown in Figure 5-15 does not match that used in the model input file. The ID numbers for 67 subwatersheds from the model input file (and the correspondence of these 67 subwatersheds to the 98 city-subwatersheds) must be provided and be shown in the simulation domain to present the geographic relationship of these subwatersheds and city-subwatersheds that are simulated in the LSPC model.
5. In the analysis of the required reduction for lead, zinc, selenium and E. coli under the dry weather condition, more detailed information about the baseline condition for 50th and 90th percentile existing concentration presented in Table 5-2 should be provided.