



City of Arcadia

June 29, 2015

Dominic Lazzaretto
City Manager

Ivar K. Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St. Ste. 200
Los Angeles, CA 90013

SUBJECT: *Submittal of the Enhanced Watershed Management Program Plan for the Rio Hondo/San Gabriel River Water Quality Group*

Dear Mr. Ridgeway,

The City of Arcadia, on behalf the Rio Hondo/San Gabriel River Water Quality Group, is pleased to submit the draft Enhanced Watershed Management Program (EWMP) in accordance with Order No. R4-2012-0175 (Municipal Separate Storm Sewer System Permit). This program was developed in partnership with the cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, the County of Los Angeles, and Los Angeles County Flood Control District.

While the City of Arcadia is committed to fulfilling the elements of the EWMP, the estimated cost of \$1.4 billion dollars (Arcadia's cost: \$357 million) to implement the EWMP represents significant financial challenges to the City as well as our partner agencies. The City will actively pursue the funding strategies outlined in EWMP to implement the proposed control measures that are reasonably and economically achievable.

Should you have any questions, please contact Vanessa Hevener, Environmental Services Officer at (626) 305-5327 or vhevener@ci.arcadia.ca.us.

Cordially,

Dominic Lazzaretto
City Manager



June 22, 2015

Mr. Dominic Lazzaretto, City Manager
City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91066

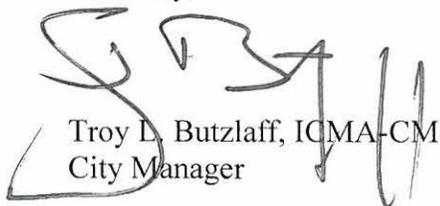
Subject: Letter Authorizing Submittal of the Rio Hondo/San Gabriel River Water Quality Group's Enhanced Watershed Management Program (EWMP) Plan to LA Regional Water Quality Control Board

Dear Mr. Lazzaretto:

It is the intent of this letter to authorize the City of Arcadia to finalize the draft Enhanced Watershed Management Program (EWMP) that was prepared for the Rio Hondo/San Gabriel River Water Quality Group and to submit the draft EWMP, on behalf of the City of Azusa, to the California Regional Water Quality Control Board – Los Angeles Region (Regional Board) to comply with Order No. R4-2012-0175 Municipal Separate Storm Sewer System Permit (MS4 Permit). As part of our submittal, the City of Azusa also requests inclusion of the attached letter from Mayor Rocha expressing the City of Azusa's concerns and reservation of rights regarding the cost of implementation of the EWMP.

Should you have any questions, please contact Daniel Bobadilla at (626) 812-5264.

Sincerely,


Troy L. Butzlaff, ICMA-CM
City Manager



The Canyon City — Gateway to the American Dream

June 15, 2015

Honorable Felicia Marcus, Chairperson
Members of the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Enhanced Watershed Management Program Implementation Costs

Dear Chairperson Marcus and Members of the Board:

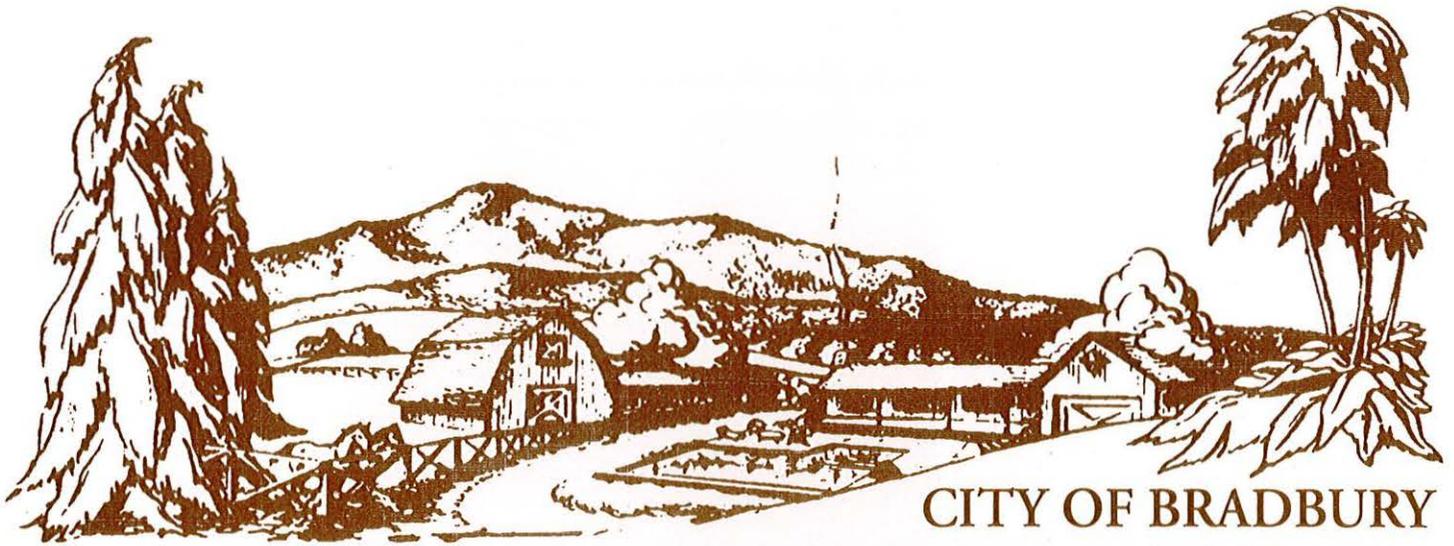
In response to the Los Angeles County Municipal Separate Storm Sewer System Permit (MS4 Permit), Order No. R4-2012-0175, the City of Azusa has partnered with the cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, the County of Los Angeles, and the Los Angeles County Flood Control District to form the Rio Hondo/San Gabriel River Water Quality Group (Group). The primary focus of the Group has been the development of an Enhanced Watershed Management Program (EWMP) that describes the compliance path the Group will utilize to comply with the water quality objectives identified in the MS4 Permit.

As the Group works to complete the EWMP, we are concerned over the significant costs associated with implementation efforts required to be in compliance with the MS4 Permit which vastly exceed the financial ability of the City of Azusa. As a Group, the EWMP implementation costs are estimated at over \$1.4 billion, with the City of Azusa's share at a staggering \$343 million. To put this into perspective, the City's annual General Fund budget is approximately \$36 million. With the estimated costs of compliance with the MS4 permit nearly 10 times more than the City's annual budget, implementation of the EWMP is not financially achievable.

The City of Azusa would like to emphasize that while it supports the water quality objectives identified in the MS4 Permit, the City does not have the financial resources to carry out its share of the EWMP implementation efforts. Until a realistic, long-term funding strategy can be identified, the City of Azusa cannot commit to implement the EWMP.

Sincerely,

Joseph Romero Rocha
Mayor
City of Azusa



CITY OF BRADBURY

Incorporated July 26, 1957

June 16, 2015

Mr. Dominic Lazzaretto
City Manager
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91066

RE: AUTHORIZATION TO SUBMIT THE RIO HONDO/SAN GABRIEL RIVER WATER QUALITY GROUP DRAFT ENHANCED WATERSHED MANAGEMENT PROGRAM ON BEHALF OF THE CITY OF BRADBURY

Dear Mr. Lazzaretto:

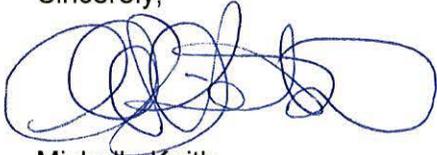
In compliance with Order No. R4-2012-0175 (Municipal Separate Storm Sewer System Permit), the City of Bradbury has been participating in the Rio Hondo/San Gabriel River Water Quality Group to develop an Enhanced Watershed Management program (EWMP). This program has been developed in partnership with the group, which is comprised of the following agencies: Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, County of Los Angeles, and Los Angeles County Flood Control District.

This letter serves to authorize the City of Arcadia to submit the draft EWMP plan to the California Regional Water Quality Control Board – Los Angeles Region on behalf of the County.

The City would like to re-emphasize to the Regional Water Quality Control Board by including this letter in the submittal packet, that while the City of Bradbury is committed to meeting water quality objectives and supporting environmental programs, including carrying out the components of the EWMP and CIMP, funding for projects and monitoring will be an obstacle for the City until a long term solution is realized. With this in mind the City will continue to do its part within its limited means and financial constraints to comply with the plan's objectives.

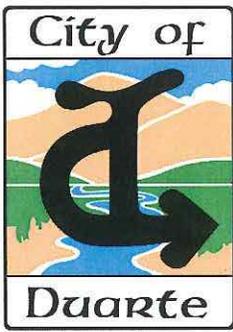
If you have any questions, please contact Ms. Michelle Keith at (626) 358-32185 or mkeith@cityofbradbury.org.

Sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and curves, positioned above the typed name.

Michelle Keith
City Manager
City of Bradbury

CC: City of Azusa
City of Bradbury
City of Duarte
City of Monrovia
City of Sierra Madre
County of Los Angeles / Los Angeles County Flood Control District



City of Duarte

1600 Huntington Drive, Duarte, CA 91010 - (626) 357-7931 - FAX (626) 358-0018

June 24, 2015

Mr. Dominic Lazzaretto
City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91066

Re: Authorizing Submittal on behalf of the City of Duarte of the Rio Hondo/San Gabriel River Water Quality Group's Enhanced Watershed Management Program (EWMP) Plan to LA Regional Water Quality Control Board

Dear Mr. Lazzaretto

The City of Duarte (Duarte) authorizes the City of Arcadia to finalize and submit the draft Enhanced Watershed Management Program (EWMP) plan to the California Regional Water Quality Control Board – Los Angeles Region, on Duarte's behalf, but requests that the submittal include this letter to set forth Duarte's concerns and reservation of rights regarding the implementation of the EWMP.

The intent of the submittal of the EWMP is to comply with the provisions of the Los Angeles County MS4 Permit (CAS004001, Order No. R4-2012-0175 – "LA MS4 Permit"). The City of Duarte, along with the cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, County of Los Angeles and the Los Angeles County Flood Control District, are participants in the Rio Hondo/San Gabriel River Water Quality Group.

The City of Duarte is committed to attempting to comply with the provisions of the MS4 Permit, and to implementing those components within the EWMP that can feasibly and economically be implemented. Duarte is similarly committed to pursuing the funding strategies provided in the EWMP to attempt to identify and secure funding for such EWMP projects that are reasonably and economically achievable. However, many of the BMPs discussed in the EWMP are not such projects.

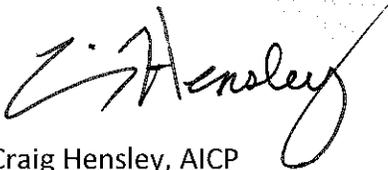
The overall estimated budget set forth in the EWMP for the member agencies is in excess of **\$1.4 billion**. The pro rata share for Duarte is currently estimated at approximately \$17 million dollars annually, and would exceed \$175 million over the next 10-12 years for Duarte alone; for a city of 22,000 residents with a general fund budget of approximately \$13 million annually, the suggested BMPs cannot realistically be implemented. In fact, even if 100% of the entire city budget were to be dedicated to implementing the various EWMP

projects in Duarte, this commitment would literally require the termination of virtually all other City services and still the funding would not be sufficient.

The City of Duarte is willing to work with its working group partners and the Regional Board staff to develop alternative BMPs and modifications to the EWMP that are more realistic, and that are economically, technically and practically achievable.

With the submittal of the EWMP, Duarte is not waiving any rights or claims it has or may have to challenge the terms of the current LA MS4 Permit, including those rights and claims asserted in Duarte's administrative petition to the State Water Resources Control Board (State Board); nor to challenge any aspect of any order issued by the State Board in connection with the LA MS4 Permit.

Sincerely,



Craig Hensley, AICP
Community Development Director



June 17, 2015

Mr. Dominic Lazzaretto
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91066

SUBJECT: Letter Authorizing Submittal of the Rio Hondo/San Gabriel River Water Quality Group's Enhanced Watershed Management Program (EWMP) Plan to LA Regional Water Quality Control Board

This letter serves to authorize the City of Arcadia to submit the draft Enhanced Watershed Management Program (EWMP) plan to the California Regional Water Quality Control Board – Los Angeles Region on behalf of the City of Monrovia (City). As you know, submittal of the EWMP is required to comply with the provisions of the Los Angeles County MS4 Permit (CAS004001, Order No. R4-2012-0175), and the City is a participant in the Rio Hondo/San Gabriel River Water Quality Group (WQG) comprised of the cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, County of Los Angeles and the Los Angeles County Flood Control District.

Please note, however, that while the City is committed to achieving the water quality objectives and provisions of the MS4 Permit through implementation of the EWMP and the Coordinated Integrated Monitoring Program plans, the extensive and significant financial resources required for the City to implement the projects identified in the WQG EWMP does pose a financial hardship for the City. In fact, the WQG EWMP has identified that the estimated total implementation cost for the program will be \$1.4 billion, and that the City's portion of that cost would be \$214.15 million.

The City will certainly make all reasonable efforts to follow the funding strategies provided in the EWMP to identify and secure funding for the WQG EWMP projects. However, until long-term funding solutions are realized, it will be extremely challenging for the City to meet water quality objectives within the timeframes identified in the EWMP. Moving forward, the City looks forward to working with the WQP agencies and the Los Angeles Regional Water Quality Control Board to develop the ongoing financial resources necessary for implementing the EWMP projects.

Should you have any questions, please contact Tina Cherry at TCherry@ci.monrovia.ca.us at (626) 932-5544 or Sharon Gallant at sgallant@ci.monrovia.ca.us or at (626) 932-5553.

Best regards,

Oliver Chi
City Manager

cc: Tina Cherry, Public Services Director
Sharon Gallant, Management Analyst II
Rio Hondo / San Gabriel River Water Quality Group Members
File



City of Sierra Madre

June 24, 2015

Mr. Dominic Lazzaretto
City Manager
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91066

Dear Mr. Lazzaretto:

**AUTHORIZATION TO SUBMIT ON BEHALF OF THE CITY OF SIERRA MADRE
THE RIO HONDO/SAN GABRIEL RIVER WATER QUALITY GROUP DRAFT
ENHANCED WATERSHED MANAGEMENT PLAN**

In compliance with Order No. R4-2012-0175 (Municipal Separate Storm Sewer system Permit) the City of Sierra Madre has been participating in the Rio Hondo/San Gabriel River Water Quality Group to develop an Enhanced Watershed Management Plan (EWMP.) The program has been developed by the County Flood Control District and the cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia and unincorporated Los Angeles County areas.

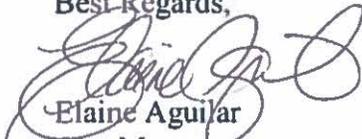
This letter serves to authorize the City of Arcadia to submit the EWMP on the behalf of the City of Sierra Madre. The City of Sierra Madre wholeheartedly supports the Regional Board's goal of cleaning up storm water through meeting the requirements of Porter Cologne and the CWA. It is in that spirit that the EWMP is submitted to the Board.

Nevertheless, the EWMP as submitted is clearly unaffordable to this community. This community approaches its 2015-16 fiscal year with a budget deficit of over \$750,000. FY 16-17 will see a deficit of over \$1 million, yet Sierra Madre's share of the EWMP costs is over \$25M from 2017 through 2028.. It is not possible to fund any of the EWMP through the city's existing budget. While Sierra Madre will seek additional funding through every means available, as you know, grant and loan funds are limited and there will be over eighty other agencies vying for those same dollars. It is our hope that we will be successful in locating funding in such a competitive market, and that the water quality data mined from our Coordinated Integrated Monitoring Plan will be of benefit in reducing the size and cost of our projects to a more affordable level.

If you have any questions or comments for Sierra Madre regarding the EWMP, they may be addressed to Mr. Bruce Inman, Director of Public Works at binman@cityofsierramadre.com or
232 West Sierra Madre Boulevard, Sierra Madre, CA 91024 (626) 355-7135

Management Analyst James Carlson at jcarlson@cityofsierramadre.com. Both can be reached by telephone at (626) 355-7135.

Best Regards,



Elaine Aguilar
City Manager



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE:

REFER TO FILE:

WM-11

June 16, 2015

Mr. Dominic Lazzaretto
City Manager
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91066

Dear Mr. Lazzaretto:

**AUTHORIZATION TO SUBMIT
COUNTY OF LOS ANGELES
RIO HONDO/SAN GABRIEL RIVER WATER QUALITY GROUP
DRAFT ENHANCED WATERSHED MANAGEMENT PROGRAM**

In compliance with Order No. R4-2012-0175 (Municipal Separate Storm Sewer System Permit), the County of Los Angeles (County) has been participating in the Rio Hondo/San Gabriel River Water Quality Group to develop an Enhanced Watershed Management program (EWMP). This program has been developed in partnership with the group, which is comprised of the following agencies: Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, the County of Los Angeles, and Los Angeles County Flood Control District.

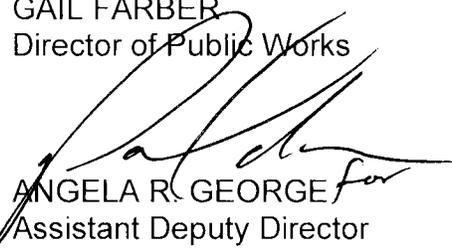
This letter serves to authorize the City of Arcadia to submit the draft EWMP plan to the California Regional Water Quality Control Board – Los Angeles Region on behalf of the County.

Mr. Dominic Lazzaretto
June 16, 2015
Page 2

If you have any questions, please contact Ms. Angela George at (626) 458-4300 or ageorge@dpw.lacounty.gov or your staff may contact Mr. Paul Alva at (626) 458-4325 or palva@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



ANGELA R. GEORGE
Assistant Deputy Director
Watershed Management Division

SR:sw

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cc: City of Azusa
City of Bradbury
City of Duarte
City of Monrovia
City of Sierra Madre



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91803-1460

IN REPLY PLEASE

REFER TO FILE:

WM-11

June 16, 2015

Mr. Dominic Lazzaretto
City Manager
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91066

Dear Mr. Lazzaretto:

**AUTHORIZATION TO SUBMIT
LOS ANGELES COUNTY FLOOD CONTROL DISTRICT
RIO HONDO/SAN GABRIEL RIVER WATER QUALITY GROUP
DRAFT ENHANCED WATERSHED MANAGEMENT PROGRAM**

In compliance with Order No. R4-2012-0175 (Municipal Separate Storm Sewer System Permit), the Los Angeles County Flood Control District (LACFCD) has been participating in the Rio Hondo/San Gabriel River Water Quality Group to develop an Enhanced Watershed Management program. This program has been developed in partnership with the group, which is comprised of the following agencies: Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, the County of Los Angeles, and LACFCD.

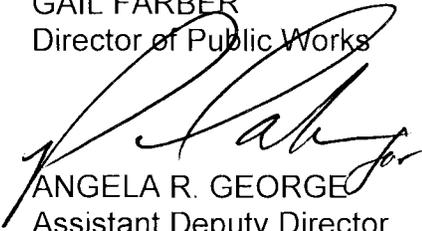
This letter serves to authorize the City of Arcadia to submit the draft Enhanced Watershed Management program plan to the California Regional Water Quality Control Board – Los Angeles Region on behalf of the LACFCD.

Mr. Dominic Lazzaretto
June 16, 2015
Page 2

If you have any questions, please contact Ms. Angela George at (626) 458-4300 or ageorge@dpw.lacounty.gov or your staff may contact Mr. Paul Alva at (626) 458-4325 or palva@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



ANGELA R. GEORGE
Assistant Deputy Director
Watershed Management Division

SR:sw

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cc: City of Azusa
City of Bradbury
City of Duarte
City of Monrovia
City of Sierra Madre