
Los Angeles Regional Water Quality Control Board

May 1, 2023

Via Email Only

Permittees of the Upper Los Angeles River Watershed Group¹

APPROVAL, WITH CONDITIONS, OF THE UPPER LOS ANGELES RIVER WATERSHED GROUP'S 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 Permittees of the Upper Los Angeles River Watershed Group:

This letter (1) conditionally approves the Watershed Management Program (WMP) submitted by the Upper Los Angeles River Watershed Management Group (Group) subject to additional revisions of the WMP, (2) reviews compliance metrics for waterbody pollutant combinations (WBPCs), and (3) specifies additional requirements including requirements for an updated adaptive management process.

1) Review of the Watershed Management Program

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 became effective on September 11, 2021. The Regional MS4 Permit allows the Permittee(s) 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).

Pursuant to the State Water Resources Control Board (State Water Board) WQ Order No. 2020-0038 and/or the Los Angeles County MS4 Permit Order No. R4-2012-0175, the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board), received the Group's revised draft WMP on June 29, 2021. Because the Regional MS4 Permit carries over many of the provisions from Order No. R4-2012-0175 and incorporates the required elements of Order No. 2020-0038, and because it is the

¹ Permittees of the Upper Los Angeles River Watershed Group include the cities of Los Angeles, Alhambra, Burbank, Calabasas, Glendale, Hidden Hills, La Cañada Flintridge, Montebello, Monterey Park, Pasadena, Rosemead, San Fernando, San Gabriel, San Marino, South El Monte, South Pasadena, and Temple City and the County of Los Angeles (Unincorporated County) and the Los Angeles County Flood Control District (LACFCD).

currently effective permit, this WMP has been reviewed per Part IX of the Regional MS4 Permit.

Public Review and Comment

On December 21, 2021, the Los Angeles Water Board provided public notice and a 76-day period to allow for public review and comment on the WMPs submitted by June 30, 2021. The Board received one joint comment letter from Heal the Bay, the Los Angeles Waterkeeper, and the Natural Resources Defense Council, which generally applied to all WMPs. These comments were considered during staff's review of the WMP.

Conditions of Approval

Pursuant to Part IX.G.3.a of the Order, the Watershed Management Program and Reasonable Assurance Analysis (RAA) are required to be consistent with the requirements of the Regional MS4 Permit. The Los Angeles Water Board hereby approves the Group's WMP, received on June 29, 2021, under the condition that the WMP is revised to address the following requirements:

1. Section ES.1.1 of the WMP states that Category 2 pollutants are based on the 2010 Clean Water Act Section 303(d) list. Similarly various table notes in Section 3.2 reference the 2010 303(d) list. The 2014/2016 303(d) list is also referenced in some table notes in this Section as well as Appendix 3.E of the WMP. Please update all the references for Category 2 pollutants to the 2020-2022 303(d) list for consistency and revise the entire WMP accordingly.
2. Table 3-2 of the WMP includes dry weather compliance milestones for the Los Angeles River (LAR) Bacteria TMDL applicable to the Group. However, there are typographical errors on some of the listed compliance months where instead of September, they list March. Please revise Table 3-2 of the WMP to change "March" to "September" for the following waterbodies' compliance dates: Compton Creek's milestone in 2025; Segment B's milestone in 2028; Rio Hondo and Arroyo Seco's milestone in 2023; Segment C's milestones in 2030 and 2037; Tujunga Wash, Burbank Western Channel, and Verdugo Wash's milestone in 2030 and 2037; Segment D's milestones in 2030 and 2037; Bull Creek's milestones in 2030 and 2037; Segment E's milestone in 2031; and Dry Canyon Creek, McCoy Creek, Bell Creek, and Aliso Canyon Wash's milestone in 2035.
3. Table 3-5 of the WMP lists selenium for LAR Reach 6 as Category 1A and 1D. Similarly, Table 3-7 of the WMP lists selenium as a Category 1D WBPC for Aliso Canyon Wash, McCoy Canyon, and Dry Canyon. In addition, Table 3-1 of the WMP includes selenium as a Category 1 WBPC and includes the Los Angeles River and Tributaries Metals TMDL (LAR Metals TMDL) compliance dates and milestones for it. However, the LAR Metals TMDL does not include WQBELs or receiving water limitations for Selenium. Per Part IX.B.3.a of the Order, Category 1 are for those pollutants for which WQBELs and receiving water limitations are established in Part IV and Attachments K through S of the Order to implement TMDLs. However,

selenium is listed for LAR Reach 6 in the 2020-2022 303(d) list. Therefore, please remove selenium from Tables 3-1, 3-5 and 3-7 of the WMP (and any additional places in the WMP) as a Category 1 WBPC for LAR Reach 6, Aliso Canyon Wash, McCoy Canyon, and Dry Canyon and categorize it as a Category 2 WBPC for those waterbodies. Additionally, selenium may be added to Table 3-9 of the WMP for these waterbodies, since it is a Category 2 WBPC without a compliance schedule.

4. Table 3-5, table note 1 states that “[p]ollutants associated with the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL [DC Harbor Toxics TMDL] were identified as applicable to Reach 1 of the LA River as the nearest downstream receiving water segment from the EWMP area”. Please note that Permittees named as responsible for the LAR Metals TMDL are not responsible for complying with WQBELs and receiving water limitations for the DC Harbor Toxics TMDL. Per Table J-11, footnote 6 in Attachment J and Part II.E of Attachment P of the Order, the ULAR Group is only responsible for monitoring requirements for the DC Harbor Toxics TMDL. Accordingly, please remove the sediment WBPCs for Reach 1 that are listed for the DC Harbor Toxics TMDL. Additionally, please remove all references and compliance schedules for the DC Harbor Toxics TMDL in the ULAR WMP. Accordingly, the DC Harbor Toxics monitoring requirements should only be included in the ULAR CIMP.
5. Tables 3-5, 3-6, 3-7, and 3-8 of the WMP include trash as a Category 1 WBPC. Please note that trash is not eligible for deemed compliance status under a WMP. For trash, Permittees are required to comply with Part X.C of the Order. Either remove from this table or add a table note to acknowledge this.
6. Table 3-5 of the WMP includes sulfate as a Category 2A WBPC for LAR Reach 6. However, the 2020-2022 303(d) list does not list sulfate for this waterbody. Please remove sulfate from LAR Reach 6 as a Category 2 WBPC.
7. Table 3-6 of the WMP includes pH as a Category 1A WBPC for Rio Hondo Reach 1. Please note that there is no TMDL for pH for Rio Hondo Reach 1. However, pH is listed in the 2020-2022 303(d) list for this waterbody. Please remove pH as a Category 1A WBPC for Rio Hondo Reach 1 and list it as a Category 2 WBPC for this waterbody. Please update Table 3-9 of the WMP accordingly.
8. Table 3-6 of the WMP does not list pH as a Category 2 WBPC for Compton Creek, as listed in the 2020-2022 303(d) list. Please add pH as a Category 2 WBPC for this waterbody.
9. Table 3-6 of the WMP does not list iron as a Category 2 WBPC for Rio Hondo Reach 3, as listed in the 2020-2022 303(d) list. Please add iron as a Category 2 WBPC for this waterbody.
10. Table 3-7 of the WMP includes selenium as a Category 2C WBPC for Caballero Creek. However, the 2020-2022 303(d) list does not list selenium for this waterbody. Please remove selenium from Caballero Creek.
11. Table 3-9 of the WMP includes oil as a Category 2 WBPC for Compton Creek. However, oil is not listed in the 2020-2022 303(d) list and also not shown in Table 3-6 of the WMP. Therefore, please remove oil from Table 3-9 of the WMP for Compton Creek.

12. Table 3-9 of the WMP includes compliance dates for eutrophic, odor, pH, total phosphorus, and total nitrogen for Echo Park Lake. However, the Echo Park Lake Nutrient TMDL is an existing condition TMDL, and per Part IV.B.2.b of the Order, and Part VII.C of Attachment Q of the Order, Permittees must comply with the WQBELs for discharges to Echo Park Lake as of the effective date of the Order. Therefore, the WMP cannot propose a schedule for this TMDL and the Group shall demonstrate compliance through monitoring. Please remove the proposed schedules for the above-mentioned WBPCs for the Echo Park Lake from Table 3-9 of the WMP.
13. Table 3-9 of the WMP includes DDT as a Category 1 WBPC for Legg Lake. However, DDT is a Category 2 WBPC for Legg Lake, as also included in Table 3-8 of the WMP. Please update Table 3-9 of the WMP to categorize DDT as a Category 2 WBPC for this waterbody.
14. Table 2-9 in Appendix 1.B of the WMP (Water Quality Priorities for the SGR Portion of South El Monte) lists bacteria as a Category 2 WBPC for San Gabriel River Reach 3. However, per Part II in Attachment R of the Order, this waterbody is subject to the San Gabriel River, Estuary and Tributaries Indicator Bacteria TMDL (SGR Bacteria TMDL). Please update the Table to move bacteria to Category 1. In addition, update the Table for Category 2 WBPCs per the 2020-2022 303(d) list to delete all the pollutants listed in the table under this category and replace them with iron. Also move dissolved oxygen from category 3 WBPCs to Category 2. Moreover, delete the San Gabriel River Reach 2 column from this Table. Include all the information regarding WBPCs for the City of South El Monte's San Gabriel River watershed portion to the main WMP document.
15. Section 3.4 in Appendix 1.B of the WMP includes scheduling of control measure implementation for San Gabriel River watershed portion of the City of South El Monte based on the milestones of the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL (SGR Metals TMDL) and the SGR Bacteria TMDL. The final milestone to achieve the SGR Bacteria TMDL is proposed in 2040, that per footnote 2, matches the timeline used for the LAR Bacteria TMDL. However, per Part II in Attachment R of the Order, the final compliance date for SGR dry weather is June 14, 2026, and for wet weather bacteria is June 14, 2036, and the schedule shall not go beyond the final compliance date specified in the TMDL. Please revise the WMP to correct the schedule. In addition, include all the information regarding schedules for the City of South El Monte's SGR watershed portion to the main WMP document. Update figure 7-28 of the WMP for the City of South El Monte to add BMP capacities and the schedule for SGR Reach 3.
16. The WMP includes the following request in table note 5 of Table 3-10, and Sections 6.2.7 and 7.3: "The ULAR WMG requests that the Regional Board remove the requirement of the 50% milestone by 2024 and combine with the final TMDL deadline of 2028, as this would provide a more realistic and feasible target for implementation of the required BMPs". However, Section 7.4.3 of the WMP states that the Group has successfully met the 75% dry weather milestone for the LAR Metals TMDL for 2020 and further state that for most ULAR jurisdictions, the wet weather metals control measures will achieve greater than 50% reduction of non-

stormwater flows for compliance with all pollutants associated with dry weather by 2024. If the Group wishes to extend the wet weather LAR TMDL milestone, the Group must remove the compliance linkage for dry and wet weather and demonstrate compliance with the dry weather LAR Metals TMDL through monitoring. Alternatively, the WMP can propose separate structural BMPs to achieve the 2024 dry weather WLA. If the Group wants to pursue an extension of the 2024 interim wet weather LAR Metals TMDL milestone, the Group must propose an alternative interim milestone within the Permit term, as required per Part IX.B.9.c.ii of the Order.

17. Section 7.3 of the WMP includes interim and final compliance milestones. These milestones are also reflected in Figures 7-6 through 7-30 of the WMP, as well as other sections and appendices throughout the WMP. However, from the 2028 final compliance date to achieve the wet weather LA River Metals TMDL (as well as the WBPCs identified in Tables 3-9 and 3-10) until the 2037 final compliance date of LA River Bacteria TMDL, the WMP does not identify another interim milestone and corresponding interim BMP capacities, as required per Parts IX.B.7.h and IX.B.9 of the Order. Please revise Section 7.3 of, as well as figures 7-6 through 7-30 and any other section and appendix of the WMP to incorporate additional interim milestone with corresponding BMP capacities between the 2028 and 2037 compliance dates.
18. Section 6.4.2 of the WMP states: "Achieve 100% of the reduction for metals and WBPCs identified in Table 3-10 and Table 3-11 (2028)". However, Section 7.3 of the WMP states: "By 2028, achieve compliance (100% milestone) for the Los Angeles River Metals TMDL and a 100% milestone for WBPCs identified in Table 3-9 and Table 3-10". Tables 3-9 and 3-10 of the WMP are the correct references to the schedules for additional WBPCs that the WMP would address through compliance with the wet weather LA River Metals TMDL. Please revise Section 6.4.2 and any other section of the WMP to reference Tables 3-9 and 3-10 of the WMP when making statements regarding the 2028 final compliance for the wet weather LA River Metals TMDL and the additional WBPCs addressed.
19. Section 5.6 as well as Appendix 5.A of the WMP include discussions of the Minimum Control Measures (MCMs) requirements. Table 5-3 of the WMP lists additional requirements in the 2012 Los Angeles County MS4 Permit vs the 2001 Los Angeles County MS4 Permit. Appendix 5.A also includes a comparison of the aforementioned two previous Permits. Update Section 5.6 and Appendix 5.A of the WMP to include the requirements in Part VIII of the current Order and update the tables accordingly.
20. To demonstrate how the proposed BMPs in the WMP will meet the RAA-required load or volume reductions, add a new table to Section 7.3 of the WMP that summarizes the baseline volume/load, the current BMP capacity achieved, the model-predicted required volume or load reduction, the total RAA-required BMP capacity, and interim/final deadlines.
21. Section 8.1 of the WMP states the following: "While the limiting pollutant analysis determined the control measures that will address all pollutants, it is not necessary to fully control zinc and *E. coli* to address the other Water Quality Priorities. For example, exceedances of metals during dry weather are rare and thus MCMs and associated control measures have reasonable assurance of attaining metals RWLs

during dry weather... As such, if exceedances of metals during dry weather or exceedances of Category 3 WBPCs identified in Table 3-10 occur during EWMP implementation, then compliance determination should not be based on the status of implementation of zinc and *E. coli* control measures. Instead, compliance determination should be based on evaluation of whether the existing level of implementation for MCMs and control measures (as of June 2015) has been maintained and adapted, if necessary, to meet limitations.” Likewise, Section 6.2.6 of the WMP includes a similar statement. Consistent with Part X of the Order, where compliance determination is based on WMP implementation and/or compliance through monitoring results, revise the last sentence to state that if there are exceedances of other Water Quality Priorities after implementation of zinc and *E. coli* control measures, compliance will be demonstrated through monitoring results. Also revise similar statements in the rest of the WMP accordingly for consistency.

22. The table title of Table 8-1 of the WMP is “EWMP Control Measures to be Assessed for Compliance Determination with ULAR EWMP if RWLs and WQBELs are not Attained per the Timelines Prescribed in the Permit and EWMP”. This table lists the WMP control measures, MCM implementation, and the Load Reduction Strategy (LRS) implementation for each weather condition and pollutant combination. This is misleading and does not align with the Regional MS4 Permit provisions. After the final compliance deadlines of the TMDL(s) and the WMP have passed, the Permittee(s) cannot continue to rely on WMP control measures and MCM implementation for compliance determination. Rather, for the final TMDL deadlines that have passed, the Permittee(s) must demonstrate compliance through monitoring results as specified in Part X of the Order (Compliance Determination). However, per Part XI.B.3, Attachment F of the Order (page F-251), the Permittee(s) can receive deemed in compliance status with final TMDL(s) deadlines that have passed, if: a) there is an approved Time Schedule Order (TSO), or 2) the Permittee(s) is complying with the TMDL-based requirements by retaining all non-stormwater runoff and the volume of stormwater runoff from the 85th percentile 24-hour storm event. Either delete Table 8-1 of the WMP or revise it per the permit requirements summarized above.
23. Update the Legal Authority in Section 2 and Appendix 2A of the WMP to reference the Regional MS4 Permit.
24. Update the Adaptive Management Proses Section (Section 8.2) of the WMP to conform to the requirements specified in Part IX.E of the Order.
25. Update the entire WMP to conform to the requirements in the Regional MS4 Permit and update all references to previous permits.

Approval of the Group’s WMP, subject to the conditions above, reinstates the Group’s deemed compliance status, per the Board’s February 25, 2022, letter on the Group’s June 30, 2021, status of compliance demonstration for the WBPCs identified in section 2.1.2 below.

The Board may rescind this approval if any of the conditions in this letter are not met to the satisfaction of the Board within the timeframe provided below. Pursuant to Part

IX.G.4 of the Order, if the necessary revisions are not appropriately made, the Group shall be subject to all requirements in the Order except those requirements pertaining to Watershed Management Programs upon disapproval by the Los Angeles Water Board.

The Group shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than **August 1, 2023**. The final WMP must be submitted electronically by uploading the files in a Folder with the name of the Group to the FTP site using the following credentials:

FTP site: <https://ftp.waterboards.ca.gov>

Username: RB4MS4-Upload

Password: RB4-bmBb3Z

Pursuant to Parts IX.C.1 and IX.G.3.c of the Order, **the Group shall implement their approved WMP immediately**. The Group is subject to all applicable compliance schedules in Part IV.B and Attachments K through S of the Order.

2) Compliance Determinations

2.1 Compliance Determination for WBPCs other than Trash

2.1.1 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 WBPC and supported via the RAA. Based on the information provided in the WMP, and pending revision of the WMP to address the conditions of this approval letter, the Board will determine deemed compliance with the Group's WMP based on the following compliance metric(s) with the approved compliance schedule:

- Figures 7-6 through 7-30 of the WMP: cumulative BMP capacity for each interim milestone for each Permittee's waterbody(ies) within their jurisdictional area

If the Group fails to attain the volume reductions milestones in these figures, then the Group shall lose deemed compliance status for their interim WQBELs. The Group must demonstrate compliance with final WQBELs through the direct demonstration of compliance options outlined in Part X.B.2.a of the Order or revise the WMP to include structural BMPs that retain all non-stormwater runoff and the volume of stormwater runoff from the 85th percentile 24-hour storm event.

2.1.2 WBPCs Eligible for Deemed Compliance Through Alternative Demonstration of 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 and pending revision of the WMP to address the conditions of this approval letter:

- Table 3-5: Category 1A,1B, and 1D WBPCs for cadmium, copper, lead, and zinc
- Tables 3-5, 3-6, and 3-7: Category 1B WBPCs for *E.coli* during wet weather for all reaches and tributaries of LAR watershed, and during dry weather for Segment A Tributary (Compton Creek), Segment B Tributaries (Rio Hondo and Arroyo Seco), Segment C (lower Reach 4 and Reach 3 - Tujunga Avenue to Figueroa Street), Segment C Tributaries (Tujunga Wash, Burbank Western Channel, and Verdugo Wash), Segment D (Reach 5 and upper Reach 4 - Balboa Boulevard to Tujunga Avenue), Segment D Tributaries (Bull Creek), Segment E (Reach 6 – LA River headwaters [confluence with Bell Creek and Calabastas Creek] to Balboa Boulevard), and Segment E Tributaries (Dry Canyon Creek, McCoy Creek, Bell Creek, and Aliso Canyon Wash)
- Table 3-5: Category 1B WBPCs for *E. coli* during dry weather for Segment B (upper and middle Reach 2 – Figueroa Street to Rosecrans Avenue), for the second phase compliance date of September 23, 2028 with submittal of a new LRS by March 23, 2023.
- Table 3-5: Category 2 and 3 WBPCs
- Table 3-6: Category 1A and 1B for lead
- Table 3-6: Category 1D WBPCs for cadmium, copper, lead, and zinc
- Table 3-6: Category 2 and 3 WBPCs
- Table 3-7: Category 1D WBPCs for cadmium, copper, lead, and zinc
- Table 3-7: Category 2 and 3 WBPCs
- Table 3-8: Category 1C WBPCs for total phosphorus, total nitrogen, ammonia, dissolved oxygen, pH, and chlorophyll-a for Legg Lake and Lake Calabastas
- Table 3-8: Category 1C WBPC for Odor for Legg Lake
- Table 3-8: Category 1C WBPCs for PCBs, chlordane, and dieldrin for Echo Park Lake
- Table 3-8: Category 1C WBPCs for PCBs, chlordane, dieldrin for Echo Park Lake
- Table 3-8: Category 2 WBPCs for DDT and PCBs for Legg Lake
- Table 2-8, Appendix 1.B for all WBPCs for San Gabriel River Reach 3 for the City of South El Monte

Any WBPCs that are not listed above are not eligible for deemed compliance for one or more of 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) or retention of all non-stormwater runoff and the volume of stormwater runoff from the 85th percentile 24-hour storm event, (c) the WMP proposes implementing baseline Permit requirements only, and/or (d) the WMP does not propose implementing additional BMPs and proposes to demonstrate compliance through monitoring.

2.2 Compliance Determination for Trash WBPCs

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.

3) Other Requirements

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.

WMP Modifications

As indicated in Part IX.E.2 of the Order, based on the results of the adaptive management process, the Permittee(s) may propose WMP modifications necessary to improve the effectiveness of the WMP. The Permittee(s) shall clearly identify any WMP modification proposals in their submittal of the adaptive management results.

Additionally, per Part IX.C.2 of the Order, notwithstanding Part IX.E (Adaptive Management) of the Order, the Permittee(s) may propose WMP modifications at any time during the term of the Order, as necessary as a standalone request. As explained in Attachment H of the Order, the Permittee(s) cannot submit WMP modification requests as part of the Annual Report. The Permittee(s) shall provide separate written requests explaining the nature of the proposed modification and justification for consideration by the Los Angeles Water Board.

Receiving Water Limitations Compliance Report

Per Part IX.B.9.c.iv of the Order and Part XIV.C.4 in Attachment E of the Order, implementation of actions to address water quality priorities in a Watershed Management Program related to addressing exceedances of receiving water limitations in Part V (Receiving Water Limitations) of the Order which is not otherwise addressed by TMDLs in Part IV of the Order and Attachments K through S, fulfills the requirements in Part V.C of the Order to prepare a Receiving Water Limitations Compliance Report.

If you have any questions, please contact Angineh Shahnazarian with the Municipal Stormwater Permitting Unit by email at Angineh.Shahnazarian@waterboards.ca.gov or by phone at (213) 576-6635. 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 Renee Purdy
Executive Officer

cc: David Dolphin, City of Alhambra
Stephen Walker, City of Burbank
Alba Lemus, City of Calabasas
Yazdan Emrani, City of Glendale
Kerry Kalman, City of Hidden Hills
Edward Hitti, City of La Cañada Flintridge
Alfredo Magallanes, City of Los Angeles
Barbara Romero, City of Los Angeles
Julie Allen, City of Los Angeles
Jonathan Ball, City of Los Angeles
James Enriquez, City of Montebello
Bonnie Tam, City of Monterey Park
Kris Markarian, City of Pasadena
Michael Chung, City of Rosemead
Matt Baumgardner, City of San Fernando
Greg de Vinck, City of San Gabriel
Robert Newman, City of San Marino
Colby Cataldi, City of South El Monte
Harold Theodore Gerber, City of South Pasadena
Scott Reimers, City of Temple City
Fernando Villaluna, Los Angeles County
Mark Lombos, Los Angeles County Flood Control District
Annelisa Ehret Moe, Heal the Bay
Benjamin Harris, LA Waterkeeper
Corinne Bell, Natural Resources Defense Council