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## Los Angeles Regional Water Quality Control Board

April 6, 2026

Via Email Only

Permittees of the Marina del Rey Watershed CIMP Group<sup>1</sup>

**APPROVAL, WITH CONDITIONS, OF THE MARINA DEL REY WATERSHED GROUP'S COORDINATED 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 Permittees of the Marina del Rey Watershed CIMP Group:

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.a of the MRP, the Marina del Rey (MdR) Watershed Management Group (Group) submitted a draft updated CIMP 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 Los Angeles Water 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.

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<sup>1</sup> Permittees of the Marina del Rey Watershed CIMP Group include the County of Los Angeles, the Los Angeles County Flood Control District, and the cities of Los Angeles and Culver City.

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

## 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 January 10, 2025, Board staff e-mailed comments to the Group requesting revisions to the March 2023 CIMP. To discuss these comments, Board staff met with the Group on March 26, 2025. On May 9, 2025, Board staff summarized the meeting and provided clarification on the comments discussed with the Group via e-mail, requesting revisions to the CIMP. On July 9, 2025, the Group submitted a revised CIMP. The revised CIMP did not fully address Board staff's comments regarding outfall monitoring for the MdR Harbor Mother's Beach and Back Basin Bacteria TMDL (MdR Bacteria TMDL). Per request of Board staff, the Group submitted additional information on Non-Stormwater Outfall screening and monitoring on September 22, 2025. On February 13, 2026, Board staff e-mailed the Group comments on the revised CIMP that reflected the additional information. Board staff agreed to remove the weekly bacteria monitoring requirement and to replace it with monitoring bacteria for every storm event. The Group submitted the 2<sup>nd</sup> revised CIMP on March 12, 2026. The 2<sup>nd</sup> revised CIMP still did not fully address Board staff's comments regarding MdR Bacteria TMDL outfall monitoring. On March 16, 2026, Board staff e-mailed comments on the 2<sup>nd</sup> revised CIMP to clarify the remaining comment about outfall monitoring for bacteria. On March 25, 2026, during a phone conversation with Board staff, the County of Los Angeles proposed alternative monitoring approaches to address the remaining comment about outfall monitoring for bacteria. On April 1, 2026, Board staff e-mailed the Group about their disagreement with Los Angeles County's alternative monitoring proposals.

The Los Angeles Water Board has reviewed the Group's CIMP dated March 12, 2026 and has determined that for the most part, it is consistent with applicable requirements in the MRP, monitoring provisions in applicable TMDLs and, specifically, with Attachments K through S of the Order. Note that, if applicable, the review of the CIMP did not include a review of any Trash Monitoring and Reporting Plans and/or Plastic Pellet Monitoring and Reporting Plans.

## Approval with Conditions

The Los Angeles Water Board hereby approves the Group's March 12, 2026 revised CIMP, subject to the following condition: **revise the CIMP sections related to outfall monitoring for the MdR Bacteria TMDL, including but not limited to Section 4.0, to add bacteria monitoring at 2 outfalls, MdR-5 and MdR-4ORB, for every storm event.** The final CIMP must be certified pursuant to Part V.B in Attachment D of the Order. Please ensure that each Permittee in the Group submits its own signed certification. The Board may rescind this approval if the above condition is not met to the satisfaction of the Board within the timeframe provided below.

The Group shall submit a final CIMP to the Los Angeles Water Board that satisfies the above condition no later than **May 6, 2026**. Pursuant to Part III.D.1.c of the MRP, **the Group shall implement their approved CIMP immediately.** An approval of the Group's CIMP does not constitute an approval of any unapproved Trash Monitoring and

Reporting Plans and/or Plastic Pellet Monitoring and Reporting Plans that were included in the CIMP, if applicable.

### **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 membership of Permittees participating in an approved CIMP (e.g., Permittee in an IMP joining a CIMP, Permittee(s) dropping out of the CIMP), the Permittee(s) affecting the change shall notify the Los Angeles Water Board promptly. The affected 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 Harumi Goya with the Municipal Stormwater Permitting Unit by email at [Harumi.Goya@waterboards.ca.gov](mailto:Harumi.Goya@waterboards.ca.gov) or by phone at (213) 620-2283. Alternatively, you may also contact Céline Gallon, Regional Programs Section Manager by email at [Celine.Gallon@waterboards.ca.gov](mailto:Celine.Gallon@waterboards.ca.gov) or by phone at (213) 576-6784.

Sincerely,

for Susana Arredondo  
Executive Officer

cc: Geremew Amenu, County of Los Angeles  
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