

Exhibit G: Rio Hondo/San Gabriel River Watershed Coordinated Integrated Management Program

The Natural Resources Defense Council (“NRDC”), Heal the Bay, and Los Angeles Waterkeeper (“LAWK”) (collectively, “Environmental Groups”) have identified several concerns with the Draft Coordinated Integrated Monitoring Program (“Draft CIMP”) ¹ for the Rio Hondo/San Gabriel River Watershed submitted by the County of Los Angeles, Los Angeles County Flood Control District, and the Cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, and Sierra Madre, collectively the Rio Hondo/San Gabriel River Water Quality Group, which we discuss below.

This discussion, however, is not intended to provide an exhaustive list of the Draft CIMP’s deficiencies. Nor does it, in general, address concerns with the Enhanced Watershed Management Program Work Plan (“EWMP Work Plan”) for the Rio Hondo/San Gabriel River Watershed.² For Environmental Groups’ comments in response to the Rio Hondo/San Gabriel EWMP Work Plan, see Environmental Groups’ September 16th letter to the Los Angeles Regional Water Quality Control Board (“Regional Board”),³ submitted under separate cover.

I. Specific Comments to Draft CIMP for the Rio Hondo/San Gabriel River Watershed

A. Maps and figures are inadequate

For each outfall monitoring site, the drainage area should be delineated. A table describing the land use of each outfall monitoring site’s drainage area should also be included. In the Draft CIMP, the included figure depicting stormwater outfall monitoring sites does not include the outfall drainage area.⁴ The CIMP should include maps and figures clearly delineating and describing the drainage areas and their land uses.

¹County of Los Angeles, Los Angeles County Flood Control District, and the Cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, and Sierra Madre (June 2014) Draft CIMP for the Rio Hondo/San Gabriel River Water Quality Group.

²County of Los Angeles, Los Angeles County Flood Control District, and the Cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, and Sierra Madre (June 2014) Rio Hondo/San Gabriel River EWMP Work Plan.

³Natural Resources Defense Council, Los Angeles Waterkeeper, and Heal the Bay. "Comments on Enhanced Watershed Management Program Work Plans and Monitoring Plans Pursuant to Requirements under the Los Angeles County Municipal Separate Storm Sewer System Permit, NPDES Permit No. CAS004001, Order No. R4-2012-0175." Letter to California Regional Water Quality Control Board, Los Angeles Region. 16 Sept. 2014.

⁴ Draft CIMP, at xiii (Figure ES-2).

B. Implementation schedule for monitoring program is insufficient

Implementation of CIMPs is required to commence within 90 days after approval of the CIMP by the Executive Officer of the Regional Water Board. (2012 Permit, Attachment E, at IV.C.6.) The Rio Hondo/San Gabriel River CIMP states that “Beginning July 1, 2015, or within 90 days of the SIMP approval, whichever is later, sample collection for all constituents at all dry-weather receiving water sites will commence. The remaining monitoring will be affected by the feasibility of collecting a sample within 90 days of the CIMP approval. The two primary factors affecting the feasibility of sample collection upon approval of this CIMP relate to (1) autosampler installation and (2) monitoring that is dependent upon prerequisite information (e.g., monitoring of significant non-stormwater discharges)”⁵ As discussed, primary factors affecting feasibility relate to autosampling installation and monitoring that is dependent upon prerequisite information (e.g., monitoring of significant non-stormwater discharges).⁶ To the extent that a delay would exceed 90 days after CIMP approval by the Executive Officer, the proposed program implementation schedule is inappropriate.

⁵ Draft CIMP, at xviii.

⁶ Draft CIMP, at xviii and 63.