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June 28, 2017

VIA Regional Website

Regional Water Quality Control Board
Los Angeles Region
Attention: Ivar K. Ridgeway, Senior Environmental Scientist
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Ridgeway,

The East San Gabriel Valley Watershed Management Group (ESGVWM Group), comprised of the Cities of Claremont, La Verne, Pomona, and San Dimas (Group Members), established the Coordinated Integrated Monitoring Program (CIMP) for the East San Gabriel Valley Watershed to fulfill the Monitoring and Reporting Program (MRP) requirements of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit Order No. R4-2012-0175 (Permit), which became effective December 28, 2012 and expires December 28, 2017.

As a part of the adaptive management process the group would like to make the following changes to the aforementioned CIMP.

- In accordance with Attachment A to Resolution No. R15-005 (Amendment to the Water Quality Control Plan – Los Angeles Region to incorporate the TMDL for Indicator Bacteria in the San Gabriel River, Estuary and Tributaries), the group will begin conducting quarterly dry-weather sampling at the start of the 2017/2018 monitoring season, for at least one sampling site in each impaired reach prior to the dry-weather compliance deadline.
- In accordance with the ESGV CIMP, the metals monitoring frequency will be reduced in San Jose Creek from four to three wet-weather events per year. Based on the review of the 2015/2016 and 2016/2017 monitoring data for San Jose Creek, the ESGVWM Group believes that a reduction in the monitoring frequency is merited. The measured metals concentrations early in the storm season are generally greater than the concentrations measured after the first

storms. Additionally the measurements in the second, third, and fourth storms are relatively consistent. Analysis of the monitoring data results in the statistically significant determination that the latter portion of the storm season has lower concentrations than the start of the season. As the data later in the season are lower than in the beginning, there is limited additional information gained by measuring four storms per year in San Jose Creek in comparison to three storms per year.

- Use Six Basins Watermaster model data to estimate flow volumes for loading estimates if the data is representative and useful. The Six Basins are a group of adjacent groundwater basins, located just south of the San Gabriel Mountains in eastern Los Angeles and western San Bernardino Counties. The model tracks rainfall, runoff volume, and infiltration into each of the six basins.
- If the above-referenced Six Basins model data does not provide useful, representative data, the ESGVWM Group will look into the possibility of installing flow meters to continuously monitor flow rates and volumes of receiving waters throughout the year. In addition, the Group will also consider collecting flow-weighted composite wet weather samples in lieu of time-weighted composite samples.

The ESGVWM Group looks forward to continuing work with Regional Board staff during the CIMP and WMP implementation and adaptive management process. If there are any questions, please contact the respective City Staff as listed below:

- Loretta Mustafa - City of Claremont, (909) 399-5474
- Lisa O'Brien - City of La Verne, (909) 596-8741
- Julie Carver - City of Pomona, (909) 620-3628
- Sasha Geschwind - City of San Dimas, (909) 394-6244

Sincerely,



Loretta Mustafa
City Engineer

Cc: Lisa O'Brien, City of La Verne
Julie Carver, City of Pomona
Sasha Geschwind, City of San Dimas