

Notice of Intent (NOI) to Develop an East San Gabriel Valley Watershed Management Area Watershed Management Program Plan

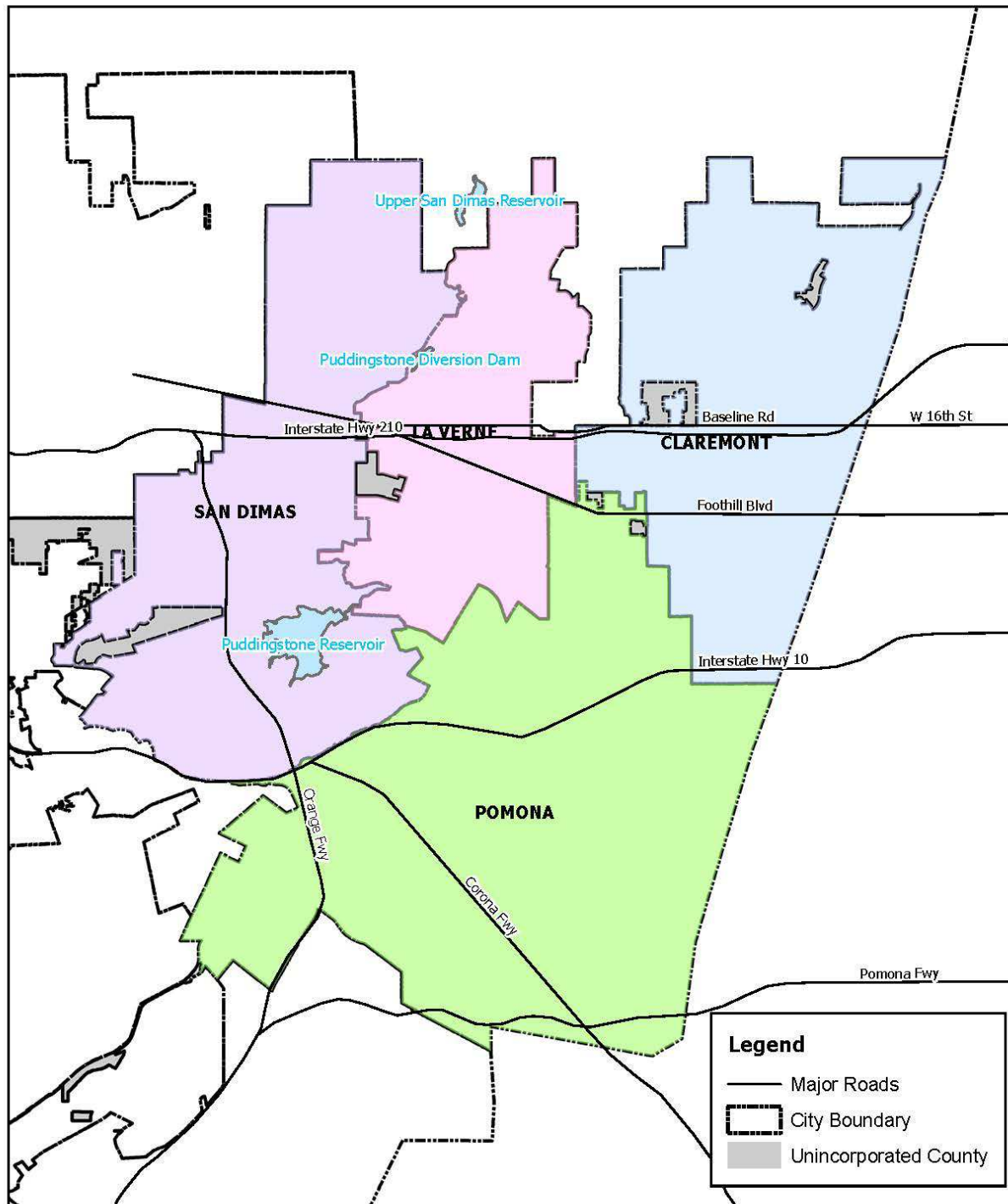
SECTION 1. PERMITTEES PARTICIPATION AND PROGRAM TYPE

The East San Gabriel Valley (ESGV) Watershed Management Area (WMA) which includes the Cities of Claremont, La Verne, Pomona and San Dimas hereby notify the Los Angeles Regional Water Quality Control Board (Regional Water Board) of our intent to develop Watershed Management Program (WMP) and Coordinated Integrated Monitoring Program (CIMP) Plans in accordance with Part VI.C.4.b.i of Order R4-2012-0175. A letter from each agency's respective official, noting its intent to work with the ESGV WMA, is included as Attachment A for your review. Order R4-2012-0175 is otherwise known as the 2012 Municipal Separate Storm Sewer System (MS4) Permit for Coastal Watersheds of Los Angeles County and the identified Cities are Permittees under that order. The ESGV WMA Permittees have drafted Low Impact Development (LID) Ordinances and Green Street Policies, but may delay their final adoption and implementation until functional conformance with similar regional documents, being developed by the County of Los Angeles, can be established. The ESGV WMA Permittees intend to submit our Draft WMP and CIMP Plans within 18 months from the effective date of Order R4-2012-0175, which currently appears to be June 28, 2014. The ESGV WMA Permittees are identified in **Figure 1**.

While the ESGV WMA Permittees are proceeding in good faith to develop the WMP and CIMP plans, many Permittees, including the ESGV WMA Cities of Claremont and Pomona, have petitioned the State Water Resources Control Board (SWRCB) to review Order R4-2012-0175 and the Receiving Water Limitations (RWLs) language it contains. Furthermore, the Regional Board has been advised of various inconsistencies in the Permit and the need for revisions. As a result of these evolving permit interpretations and unforeseeable actions by the SWRCB, or other watershed stakeholders, the ESGV WMA Permittees reserve the right to revise this NOI prior to the final compliance date for submission of the draft WMP and CIMP plans.

SECTION 2. TOTAL MAXIMUM DAILY LOADS ESTABLISHED WATER QUALITY BASED EFFLUENT LIMITATIONS

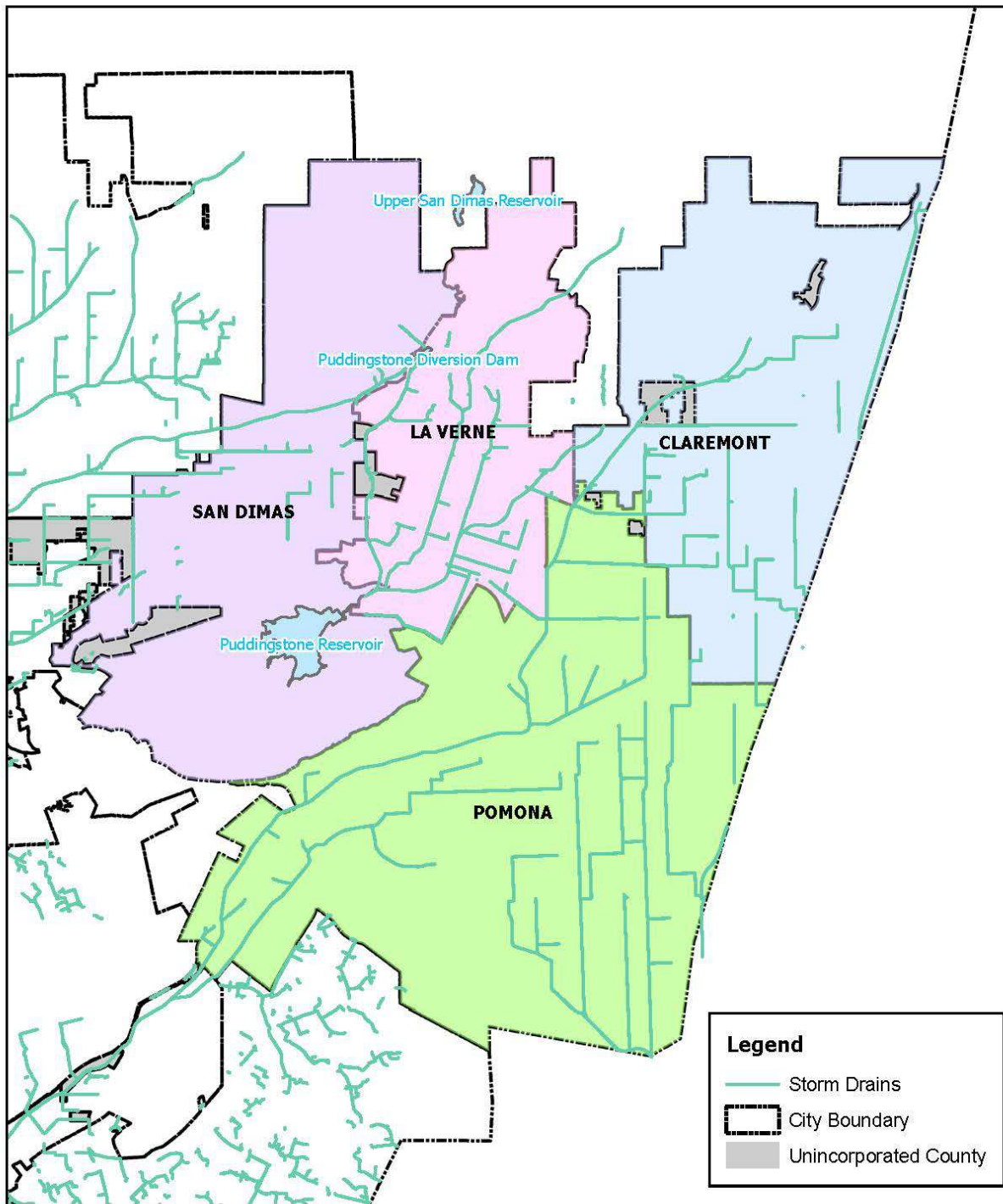
The Total Maximum Daily Loads (TMDLs) that are currently applicable to the ESGV WMA Permittees were developed by either the United States Environmental Protection Agency (USEPA) or adopted by the Santa Ana Regional Water Quality Control Board. As shown in **Figure 2**, a substantial portion on the eastern side of the Cities of Claremont and Pomona drain to the San Antonio or Chino Creeks and the Santa Ana River. Although the ESGV WMA Permittees continue to implement Best Management Practices (BMPs) and other pollutant source controls that should alleviate the TMDL identified beneficial use impairments, these TMDLs contain no interim or final RWLs or Water Quality Based Effluent Limitations (WQBELs) compliance dates during the WMP and CIMP Plans development period. Compliance Schedules for USEPA established TMDLs would be developed as proposed in Permit Part VI.E.3, while the Middle Santa Ana River Bacteria TMDL schedule will follow Permit Attachment R.



**East San Gabriel Valley WMA
Major Roads and City Boundaries**



Figure 1. East San Gabriel Valley Watershed Management Area Permittees and Vicinity Map.



**East San Gabriel Valley WMA
Storm Drains**



Figure 2. Major Drainage Conveyances in the East San Gabriel Valley WMA.

SECTION 3. IDENTIFY TMDL CONTROL MEASURES

The ESGV WMA Permittees intend to continue to effectively implement the Minimum Control Measures (MCM) provisions of the 2012 MS4 Permit in anticipation of demonstrating continued progress toward regional water quality and beneficial use objectives in local receiving waters.

SECTION 4. LID ORDINANCE AND GREEN STREETS POLICY STATUS

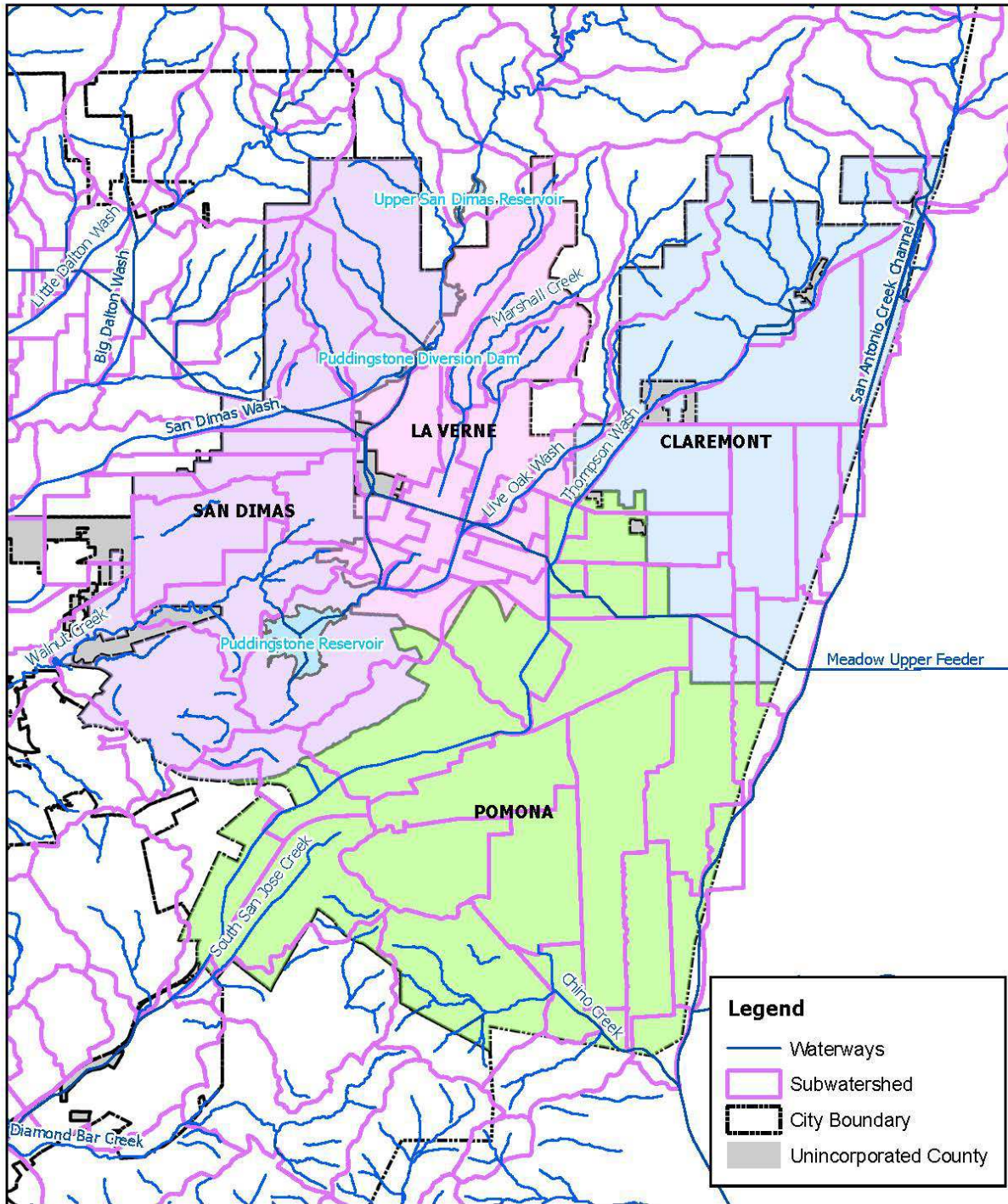
The ESGV WMA Cities of Claremont, La Verne, and Pomona have drafted LID ordinances and Green Streets policies, derived from the templates provided by the Los Angeles Permit Group, which follow as Attachments B and C respectively. The City of San Dimas has developed separate draft LID and Green Streets documents, which follow as Attachments D and E respectively. The adoption status of these measures, within the ESGV WMA, is summarized on **Tables 1 and 2**, using Permittee area estimates provided by the Los Angeles County Department of Public Works. Once adopted, these ordinances and policies are anticipated to be in compliance with applicable sections of the 2012 MS4 Permit. However, to avoid unanticipated discrepancies or conflicting interpretations among adjacent agencies, adoption of the ordinance by each agency will follow release, and review for substantial conformance, of the County of Los Angeles LID Ordinance. Subwatersheds from the Los Angeles County Geospatial Library, are shown in **Figure 3**, however these areas may be subject to revision during WMP Plan development, when the boundaries must be better characterized in anticipation of CIMP and RAA analyses.

Table 1. Status of LID Ordinance Adoption by the ESGV WMA Permittees.

ESGV WMA Permittee	LID Ordinance Status	ESGV WMA for which Permittee is Responsible [acres]	ESGV WMA Addressed by Permittee's Draft LID Ordinance [acres]	Percent of Watershed Area
City of Claremont	Draft Ordinance	5,790	5,790	100%
City of La Verne	Draft Ordinance	5,030	5,030	100%
City of Pomona	Draft Ordinance	7,929	7,929	100%
City of San Dimas	Draft Ordinance	8,539	8,539	100%
Summary for ESGV WMA		27,288	27,288	100%

Table 2. Status of Green Street Policy Adoption by the ESGV WMA Permittees.

ESGV WMA Permittee	Green Street Policy Status	ESGV WMA for which Permittee is Responsible [acres]	ESGV WMA Addressed by Permittee's Draft Green Street Policy [acres]	Percent of Watershed Area
City of Claremont	Draft Policy	5,790	5,790	100%
City of La Verne	Draft Policy	5,030	5,030	100%
City of Pomona	Draft Policy	7,929	7,929	100%
City of San Dimas	Draft Policy	8,539	8,539	100%
Summary for ESGV WMA		27,288	27,288	100%



**East San Gabriel Valley WMA
LA County Subwatersheds**



Figure 3. Los Angeles County Designated Subwatersheds in the East San Gabriel Valley WMA.