May 2, 2016

Mr. Samuel Unger, Executive Officer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Unger:

Subject: Modification of CIMP – Historically Driest Month July

On July 22, 2015, the City of Santa Clarita (City), County of Los Angeles (County), and Los Angeles County Flood Control District (Flood Control District) received approval for the Upper Santa Clara River Coordinated Integrated Monitoring Program (CIMP), as part of compliance with Order Number R4-2012-0175 NPDES Permit Number CAS004001 for MS4 Discharges within the Coastal Watershed of Los Angeles County (NPDES Permit). The approved CIMP states:

As part of implementation of the CIMP, opportunities to coordinate with the existing or proposed monitoring efforts will be explored. The CIMP is written to outline the monitoring requirements to assess the USCRWMG MS4 requirements. Coordination with other monitoring programs may occur in the future, where data from other programs may be used to fulfill USCRWMG monitoring requirements.

The NPDES Permit states:

The CIMP provides Permittees opportunities to increase the cost efficiency and effectiveness of the monitoring program. The greatest efficiency may be achieved when a CIMP is designed and implemented on a watershed basis.

Subsequent to the submittal and approval of its CIMP, the group has been in discussions with the Santa Clarita Valley Sanitation Districts of Los Angeles County (Sanitation Districts) regarding coordination of monitoring efforts. The Sanitation Districts have two NPDES Permits for their water reclamation plants in the upper Santa Clara River: Valencia WRP: Order R4-2015-0071, NPDES No. CA0054216, and Saugus WRP: Order R4-2015-0072, NPDES No. CA0054313. To be in compliance with these two NPDES Permits, the Sanitation Districts monitor dry weather water quality in the Upper Santa Clara River.
The Sanitation Districts are required to monitor for priority pollutants in January and July of each year, July being the historically driest month in their NPDES Permits. At the time of the final CIMP submittal, the City, County, and Flood Control District determined there was no substantial difference between the historically driest month being designated as July or August. The data analyzed for the CIMP is attached for your reference and shows a .01 inch difference between the historic rainfall for the two months. The group selected August to include in the CIMP.

The City, County, and Flood Control District hereby request a modification to the CIMP to allow the historically driest month for the upper Santa Clara River to be July instead of August to improve coordination, consistency, and cost effectiveness of the monitoring program. This change will be effective for the July 2016 monitoring event with the Sanitation District.

Please contact me directly if there are any comments or questions regarding this document at hmerenda@santa-clarita.com or 661-286-4098.

Sincerely,

Heather Lea Merenda
Environmental Services Program Coordinator

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Attachment

cc: Robert Newman, Director of Public Works
    Travis Lange, Environmental Services Manager
Santa Clara River Historic Driest Month Rainfall Data Summary

Average Monthly Rainfall From 1986-2013