

Exhibit K: Upper San Gabriel River Watershed Coordinated Integrated Monitoring 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”) for the Upper San Gabriel River Watershed submitted by the County of Los Angeles, Los Angeles County Flood Control District, Cities of Baldwin Park, Covina, Glendora, Industry, and La Puente, collectively the Upper San Gabriel River Enhanced Watershed Management Program Group,¹ which we discuss below.

This discussion, however, is not intended to provide an exhaustive list of deficiencies of the Draft CIMP. Nor does it, in general, address concerns with the Enhanced Watershed Management Program Work Plan for the Upper San Gabriel Watershed.² For Environmental Groups’ comments in response to the Upper San Gabriel EWMP Work Plan, please 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 the CIMP for the Upper San Gabriel River Watershed

A. The Proposed Outfall-Based Monitoring is Insufficient

The Draft CIMP lacks sufficient outfall monitoring sites. Each permittee must include outfall monitoring in at least one major outfall for each subwatershed (HUC-12) drainage area. (2012 Permit, Attachment E, at VIII.A.1.a.) However, here the default procedure was modified to include only one outfall per jurisdiction, and therefore not every HUC-12 includes an outfall monitoring site.⁴ The CIMP claims to use an alternative approach that the Permit allows “to increase the cost efficiency and effectiveness of the monitoring program.”⁵ However, this limited system does not ensure adequate monitoring.

¹County of Los Angeles, Los Angeles County Flood Control District, Cities of Baldwin Park, Covina, Glendora, Industry, and La Puente (June 2014) Upper San Gabriel Coordinated Integrated Monitoring Program (“Draft CIMP”).

²County of Los Angeles, Los Angeles County Flood Control District, Cities of Baldwin Park, Covina, Glendora, Industry, and La Puente (June 2014) Upper San Gabriel Enhanced Watershed Management Program Work Plan (“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.

⁴Draft CIMP, at 30.

⁵*Id.* at 28.

B. The Wet Weather Monitoring Plan does not Meet TMDL Requirements

The Draft CIMP's wet weather monitoring plan is not in compliance with TMDL requirements. The Metals TMDL specifies four wet weather events annually for effectiveness monitoring. (Permit, at p.219) However, the Draft CIMP specifies that effectiveness monitoring within the EWMP area will only be conducted on three wet weather events annually, claiming that this more limited monitoring is for the purpose of "be[ing] consistent with the monitoring frequency for other constituents and stormwater outfall monitoring."⁶

C. Improper Use of Adaptive Management

The Draft CIMP acknowledges that much of the sampling "may result in data that will require changes to ensure monitoring meets the requirements and intent of the MRP and supports EWMP implementation."⁷ However, some of these expected changes to the sampling program are problematic, including a plan to discontinue monitoring of "MRP Table E-2" and category 3 pollutants if no exceedences are observed after one or two consecutive years of monitoring, respectively, as well as a plan to discontinue monitoring certain constituents not identified as water quality priorities.⁸ The CIMP should reconsider permitting these changes, which are likely to result in inadequate monitoring.

⁶ *Id.*, at 19.

⁷ Draft CIMP, at 56.

⁸ *Id.*, at 19, 56-57.