

# Notice of Intent

## Enhanced Watershed Management Program (EWMP) and Coordinated Integrated Monitoring Program

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### SECTION 1. PROGRAM TYPE AND PERMITTEES

The Permittees (listed in **Table 1**) that are party to this Notice of Intent (NOI) hereby notify the Los Angeles Regional Water Quality Control Board (Regional Water Board) of their intent to develop an Enhanced Watershed Management Plan (EWMP) for the Upper Santa Clara River Watershed. This NOI is being submitted in accordance with Part VI.C.4.b.i of Order R4-2012-0175. Permittees meet the LID and Green Street conditions and will submit a Work Plan within 18 months of the effective date of the Order R4-2012-0175 (June 28, 2014) and will submit the Draft EWMP within 30 months of the effective date of Order R4-2012-0175 (June 28, 2015).

The Permittees (listed in **Table 1**) that are party to this NOI hereby notify the Regional Water Board of their intent to develop a Coordinated Integrated Monitoring Program (CIMP). The Permittees intend to follow a CIMP approach for each of the required monitoring plan elements and will submit the CIMP within 18 months of the effective date of Order R4-2012-0175 (June 28, 2014).

**Table 1. Enhanced Watershed Management Program Permittees**

City of Santa Clarita
Los Angeles County
Los Angeles County Flood Control District

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

**Table 2** lists applicable interim and final trash Water Quality Based Effluent Limitations (WQBELs) and all other final WQBELs and receiving water limitations established by Total Maximum Daily Loads (TMDLs) and identified by Section VI.C.4.B.ii of the Order. However, per the Nutrients TMDL and the Chloride TMDL for the Santa Clara River, the primary source of these pollutants is not the storm drain system.

**Table 2. Applicable Interim and Final Trash WQBELs and all other Final WQBELs and Receiving Water Limitations<sup>1</sup> Occurring Before Enhanced Watershed Management Program Approval**

TMDL Order	WQBEL	Interim/Final	Compliance Date
Santa Clara River Nutrients TMDL	Reach 5 Total Ammonia as Nitrogen 1-hr average 5.2 mg/L 30 day average 1.75 mg/L  Nitrate as Nitrogen plus Nitrite as Nitrogen 30 day average 6.8 mg/L	Final	April 6, 2010
Santa Clara River Chloride TMDL	Reach 5 and 6 100 mg/L	Final	March 23, 2004
Lake Elizabeth, Munz Lake, Lake Hughes Trash TMDL R4-2007-009	20% drainage area covered by Full Capture System	Interim	March 6, 2012
	40% drainage area covered by Full Capture System	Interim	March 6, 2013
	60% drainage area covered by Full Capture System	Interim	March 6, 2014
	80% drainage area covered by Full Capture System	Interim	March 6, 2015
	100% drainage area covered by Full Capture System	Final	March 6, 2016
<sup>1</sup> Per Order R4-2012-0175, interim and final WQBELs are listed for trash TMDL and final WQBELs are listed for other pollutants.			

**SECTION 3. IDENTIFY TMDL CONTROL MEASURES:**

The Permittees to this EWMP are responsible for one TMDL that has interim (trash only) and final WQBELs that occur prior to the anticipated approval of the Program. **Table 3** identifies the control measures being implemented by each Permittee for the TMDL. The Permittees will continue to implement these measures during the development of the EWMP.

**Table 3. Control Measures that will be Implemented Concurrently with EWMP Development for TMDLs**

TMDL	Permittees	Implementation Plan and Control Measures	Status of Implementation
Lake Elizabeth, Trash TMDL R4-2007-009	County of Los Angeles	Five Full Capture Devices Required to achieve the final WLAs	Completed as of September 2012

**SECTION 4. DEMONSTRATION OF MEETING LID ORDINANCE AND GREEN STREET POLICY REQUIREMENTS:**

The Permittees that are party to this NOI have LID ordinances and Green Streets policies in place or in development. **Table 4** summarizes the status of the Permittees’ LID ordinances and **Table 5** summarizes the status of the Permittees’ Green Streets policies. More than 50% of the MS4 watershed area that will be addressed by the EWMP is covered by LID ordinances and Green Streets policies. County of Los Angeles and City of Santa Clarita Draft Green Streets Policy and Draft LID Ordinance are available on request.

**Table 4. Status of LID Ordinance Coverage of the MS4 Watershed Area Addressed by the EWMP**

Permittee	LID Ordinance (Indicate Status)	MS4 Watershed Area for which Permittee is Responsible [acres]	MS4 Watershed Area Covered by Permittee’s LID Ordinance [acres]	Percentage of Watershed Area
City of Santa Clarita	In Development	39,450.9		
County of Los Angeles	Draft Ordinance	81,972.1	81,972.1	67.5
LACFCD	N/A	N/A	N/A	N/A
Total MS4 Watershed Area		121,423		
Total MS4 Watershed Area Covered by LID Ordinances			121,423	
% of MS4 Watershed Area Covered by LID Ordinance)				67.5%
Status Descriptions:				
<ul style="list-style-type: none"> <li>• Draft Ordinance – Permittee has completed, or will complete by June 28, 2013, the development of a draft LID Ordinance that is in compliance with the requirements of Order R4-2012-0175 for its portion of the MS4 watershed.</li> <li>• In Development – Permittee initiated development of an LID Ordinance that is in compliance with the requirements of Order R4-2012-0175 for its portion of the MS4 in the watershed within 60 days of the effective date of Order R4-2012-0175 and will have a draft ordinance.</li> </ul>				

**Table 5. Status of Green Street Policy Coverage of the MS4 Watershed Area Addressed by the EWMP**

Permittee	Green Street Policy (Indicate Status)	MS4 Watershed Area for which Permittee is Responsible [acres]	MS4 Watershed Area Covered by Permittee's LID Ordinance [acres]	Percentage of Watershed Area
City of Santa Clarita	In Place	39,450.9	39,450.9	32.5
County of Los Angeles	Draft Policy	81,972.1	81,972.1	67.5
LACFCD	N/A	N/A	N/A	N/A
Total MS4 Watershed Area		121,423		
Total MS4 Watershed Area Covered by Green Street Policies			121,423	
% of MS4 Watershed Area Covered by Green Street Policies				100
Status Descriptions: <ul style="list-style-type: none"> <li>• In Place – Permittee has adopted a Green Street Policy that is in compliance with the requirements of Order R4-2012-0175 for its portion of the MS4 in the watershed.</li> <li>• Draft Policy – Permittee has completed, or will complete by June 28, 2013, the development of a draft Green Street Policy that is in compliance with the requirements of Order R4-2012-0175 for its portion of the MS4 watershed.</li> <li>• In Development – Permittee initiated development of a Green Street Policy that is in compliance with the requirements of Order R4-2012-0175 for its portion of the MS4 in the watershed within 60 days of the effective date of Order R4-2012-0175 and will have a draft policy.</li> </ul>				

**SECTION 5. GEOGRAPHIC SCOPE OF ENHANCED WATERSHED MANAGEMENT PROGRAM:**

The geographic scope covered by this EWMP is the portion of the upper Santa Clara River in Los Angeles County and the City of Santa Clarita that is regulated by the Los Angeles County MS4 NPDES Permit. The scope excludes state and federal lands, including the Angeles National Forest and the state parks lands. The Angeles National Forest and the state parks lands are outside Los Angeles County MS4 NPDES Permit regulation and therefore not subject to the conditions of this permit. The upper Santa Clara River watershed covered by the EWMP encompasses approximately 121,423 acres. The entire Santa Clara River Watershed is 1,634 square miles, which includes the land area within Ventura County as well as national forest and state park land that is not included in this EWMP. **Table 6** provides a breakdown of the land area within the EWMP by Permittee and the land area of the upper Santa Clara River outside of NPDES Permit conditions that are not included in the EWMP. **Figure 1** provides a map of the watershed boundaries and notes the jurisdictional boundaries of the Permittees and other pertinent entities in the upper Santa Clara River. Of the total watershed area, the City of Santa Clarita and County of Los Angeles have jurisdiction over 46% of the land area. The City of Santa Clarita and County of Los Angeles do not have jurisdiction over lands owned by the State of California or the federal government including the Angeles National Forest and state owned open space lands.

**Table 6. Approximate Land Area within EWMP and Other Watershed Areas**

Permittee	EWMP Agency	Approximate Land Area (Acres or Square Miles)
<b>Watershed Lands Within EWMP Area For Which the Permittees are Responsible</b>		
County of Los Angeles	Yes	81,972.1
City of Santa Clarita	Yes	39,450.9
Los Angeles County Flood Control District	Yes	N/A
<b>Approximate Area of EWMP Agencies</b>		<b>121,423</b>
<b>Watershed Lands Outside of EWMP and NPDES Permit Conditions</b>		
State Parks Land (upper Santa Clara only)	No	344
Angeles National Forest	No	140,981
<b>Approximate Total Upper Santa Clara River Watershed</b>		<b>262,748</b>

**SECTION 6. PLAN CONCEPT AND INTERIM MILESTONES AND DEADLINES:**

Unlike other watersheds, MS4 TMDL implementation plans have not been developed for the upper Santa Clara River watershed. However, the County of Los Angeles and City of Santa Clarita have a long history of collaboration to solve problems. The EWMP area is part of an integrated regional water management plan. Through the Upper Santa Clara River Integrated Regional Water Management Plan the County of Los Angeles and the City of Santa Clarita work collaboratively with local water retailers and suppliers, the Santa Clarita Valley Sanitation District, and local stakeholders to prioritize projects that improve water management in the region. This tradition continues through an agreement to work together on the EWMP. The City of Santa Clarita and the County of Los Angeles were in discussions to work together on the bacteria TMDL as the new NPDES Permit was adopted. Those efforts have been modified to incorporate the EWMP requirements. The City of Santa Clarita will act as coordinating agency for the effort working collaboratively with County of Los Angeles and the many other stakeholders in the area to develop and analyze EWMP efforts and projects. Volunteer efforts, such as the annual River Rally clean up, will also be incorporated to gain community support for the EWMP.

Protecting the environment has always been a priority for the area. The upper Santa Clara River watershed provides a unique interface between a natural river and developed areas. The City has endeavored to protect and restore the Santa Clara River through land acquisitions and invasive

species removal projects. The City has preserved 7,955 acres of open space and County of Los Angeles has over 2,200 acres. This is in addition to the nearly 140,000 acres of national forest land. Over 117 species of threatened, endangered or sensitive plant and wildlife species have been recorded in the Santa Clara River watershed. The EWMP will help continue and build on existing efforts to conserve and restore the Santa Clara River.

The primary approach to the EWMP will include the most community friendly and cost effective methods of reducing urban runoff pollution. The economic impacts will be an important part of the analysis of any project. In order to control costs and provide the most cost effective approach, the EWMP Group will consider the following methods to reduce pollutants. These efforts can be applied to any pollutant.

- Active source control
- Business training and outreach
- Outreach to residents
- Incentive programs
- Closer collaboration on outdoor water use and landscape management with water suppliers
- Adaptive management to prioritize potential enforcement actions
- Continued active pursuit of open space

The EWMP will also evaluate multi-benefit regional projects that will retain, through infiltration or capture and reuse, the storm water volume from the 85th percentile, 24-hour storm for the drainage areas tributary to projects. The Santa Clarita Valley currently has excellent infiltration of storm water and dry weather flows in many areas, including the riverbed itself.

Consistent with the Open Space and Conservation Element of the City General Plan and County General Plan for the Santa Clarita Valley, the EWMP concept will focus on government, business, and citizens working together to create a vision of sustainable development that includes both human and environmental wellness and economic viability, or sustainability.

Using these considerations, multi-benefit regional projects will be evaluated for feasibility alongside other watershed control measures to work toward MS4 discharge compliance with all interim and final WQBELs. The evaluation will include source identification and analysis to determine the best course of action considering human and environmental wellness, stakeholder input, Technical Advisory Committee feedback, economic considerations and practicability and feasibility of proposed projects. The resulting prioritized projects will form the basis of the proposed EWMP.

To develop the EWMP and CIMP, the City and County will develop a Work Plan outlining the proposed approach to development of the EWMP. To ensure adequate progress is being made to achieve the permit deadlines, interim milestone and deadlines for Work Plan, CIMP, and EWMP Plan development were identified and are summarized in Table 7.

**Table 7. Enhanced Watershed Management Program Interim Milestones and Deadlines**

Table 7. Enhanced Watershed Management Program Interim Milestones and Deadlines	Deadline
Sign MOU and award contract	July 2013 *
Compile technical memorandum of water quality priorities	December 2013 *
Complete internal draft of EWMP Work Plan	February 2014 *
Complete draft CIMP	February 2014 *
Technical Advisory Committee Review and Comments on CIMP and draft EWMP Work Plan	April 2014 *
Submit final EWMP Work Plan	June 2014
Submit final CIMP	June 2014
Conduct initial RAA based on selected watershed control measures	December 2014*
Complete internal draft of EWMP	March 2015 *
Submit draft EWMP to Regional Water Board	June 2015
Submit Final EWMP to Regional Water Board (revised based on to Regional Water Board comments)	January 2016

\* DATES ARE TENTATIVE ESTIMATES AND MAY CHANGE ON AN AS NEEDED BASIS

**SECTION 7. COST ESTIMATE:**

The cost estimate for the development of the EWMP is \$745,800 and the CIMP is \$100,000. This does not include implementation costs or ongoing maintenance costs. It is estimated that the cost of staff time for both City and County to administer, research, evaluate and prepare for reviews and approvals will exceed several hundred thousand dollars over the 30 month period.

**SECTION 8. PERMITTEE MEMORANDUM OF UNDERSTANDING:**

All Permittees to the EWMP are committed to the completion of the program development.

A copy of the final draft Memorandum of Understanding with a signed letter of intent for the County of Los Angeles, City of Santa Clarita, and the Los Angeles County Flood Control District are included in **Attachment A**

**SECTION 9. COMMITMENT TO IMPLEMENT A STRUCTURAL BMP OR SUITE OF BMPS:**

The Permittees listed in **Table 8** will implement the identified suite of BMPs to fulfill the obligations under Part VI.C.b.iii. (5).

**Table 8. Structural BMP or Suite of BMPs to be Implemented in the EWMP Watershed**

Watershed	Permittee	Structural BMP or Suite of BMPs to be Implemented	Planned Implementation Date
Santa Clara River	County of Los Angeles	Trash removal BMPs for up to 79 storm drain inlets in commercial and industrial park	July 2015
Santa Clara River	City of Santa Clarita	Trash removal BMPs for up to 110 storm drain inlets in commercial and industrial park	July 2015

**SECTION 10. INCORPORATION OF THE LOS ANGELES RIVER WATERSHED PORTION OF THE CITY OF SANTA CLARITA INTO EWMP**

The City of Santa Clarita is also including an extremely small area, 0.09 square miles (or 0.233 square kilometers) of the Los Angeles River watershed located within City limits in this Notice of Intent. The map of this area is in **Figure 2**. This small area is rural and undeveloped. There are no storm drains, gutters, catch basins, or Municipal Separate Storm Sewer Systems (MS4s) in this location. When it rains, the single paved road sheds water by sheet-flow to the surrounding open areas. The nearest tributary to the Los Angeles River is Bull Creek, which is located approximately 7 miles from this location. The City of Santa Clarita submitted a letter to the Regional Water Quality Control Board dated April 11, 2013 regarding the Los Angeles River Bacteria TMDL. In this letter we requested a revision to the square footage of Los Angeles River watershed that was within City limits and incorporation of this portion of the Los Angeles River Watershed into the EWMP process for the Santa Clara River That request is pending. Nevertheless, the City would proceed with conditioning development and requiring post construction best management practices as required by the MS4 NPDES Permit in the area. In order to meet the deadline required by the NOI, the City has included this section to address the small area and to incorporate it into the larger EWMP process. The TMDLs that will be included during the EWMP development period for the Los Angeles River that affect that reach are listed in **Table 9**.

In spite of its rural characteristics, the road is swept on a weekly basis and the City monitors the area regularly for any illegal dumping activity. Based on the Santa Clara River TMDL for Nitrogen and Effects TMDL modeling, aerial deposition of air pollution undeveloped lands is second highest source of nitrogen loading in the area. As referenced in Tables 4 and 5 the City of Santa Clarita is in the process of meeting the LID and green streets policies as required. The area would be incorporated as part of the EWMP analysis. The timelines are outlined in **Table 7**. It is anticipated the area would be assessed for pollution sources and considered for appropriate best management practices, including infiltration of the 85<sup>th</sup> percentile storm, from projects that propose installation of storm drains or new development. The City would follow its sustainability philosophy and pollutant prioritization to determine the best way to address this small drainage area in the City limits that is largely undeveloped open space.

Los Angeles County has developed its own compliance path for the Los Angeles River due to the large unincorporated lands in that watershed. Therefore, the areas for consideration in the EWMP are unique to the City of Santa Clarita. However, due to the nature of the joint relationship with Los Angeles County in this endeavor, it is difficult to separate out the work in the EWMP. Working with a single consultant is critical to efficient and cost effective work. Therefore, the intent is to incorporate only the City's area into the analysis and sequence the work appropriately. Therefore, this small portion will be incorporated under the same EWMP contract and effort.

**Table 9. Los Angeles River Interim and Final Trash WQBELs and all other Final WQBELs and Receiving Water Limitations Occurring Before Enhanced Watershed Management Program Approval**

<b>TMDL Order</b>	<b>WQBEL</b>	<b>Interim or Final</b>	<b>Compliance Date</b>
<b>Los Angeles River Nitrogen Compounds and Related Effects TMDL R12 - 010</b>	<b>NH3-N (ammonia) One-hour average 10.1 mg/l</b>	<b>Final</b>	<b>December 28, 2012</b>
	<b>NH3-N (ammonia) 30 day average 2.3 mg/l</b>		
	<b>NO3-N (nitrate) 30 day average 8.0 mg/l</b>		
	<b>NO2-N (nitrite) 30 day average 1.0 mg/l</b>		
	<b>NO3-N + NO2-N 30 day average 8.0 mg/l</b>		
<b>Los Angeles River Watershed Trash TMDL - 2007 - 012</b>	30% of baseline	Interim	September 30, 2012
	20% of baseline	Interim	September 30, 2013
	10% baseline	Interim	September 30, 2014
	3.3% baseline	Interim	September 30, 2015
	0 percent baseline	Final	September 30, 2016