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## Los Angeles Regional Water Quality Control Board

June 19, 2024

Via Email Only

Mr. Salvador Mendez  
Public Works and Utilities Director,  
City of El Monte  
11333 Valley Boulevard  
El Monte, CA 91731

**FINAL APPROVAL OF THE CITY OF EL MONTE'S WATERSHED MANAGEMENT PROGRAM (WMP) PURSUANT TO THE REGIONAL MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR THE LOS ANGELES REGION (NPDES PERMIT NO. CAS004004; ORDER NO. R4-2021-0105)**

Dear Mr. Mendez:

The Regional MS4 Permit (Order No. R4-2021-0105) authorizes discharges from the MS4 operated by 99 municipal Permittees within the coastal watersheds of Los Angeles and Ventura Counties (hereafter, Regional MS4 Permit or Order). The Regional MS4 Permit allows Permittees the option to use a Watershed Management Program (WMP) to implement many of the permit's requirements through customized strategies, control measures, and best management practices (BMPs).

*1) Approval of the Watershed Management Program*

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board), approved with conditions, the City of El Monte's (City) WMP on May 1, 2023. The conditional approval letter directed the City to submit a final WMP that satisfies all the conditions listed in the letter no later than August 1, 2023. The City submitted a revised WMP on August 2, 2023. On November 6, 2023, the Board asked clarifying questions via an e-mail regarding the revised WMP and met with the City on November 29, 2023. Subsequently, the City requested to submit a revised WMP by January 31, 2024 to address the additional comments. The City submitted the final WMP on January 31, 2024.

After reviewing the City's final WMP, the Board has determined that the City's WMP, submitted on January 31, 2024, is consistent with the requirements of the Regional MS4 Permit. The Los Angeles Water Board hereby approves the City's WMP, submitted on January 31, 2024. Pursuant to Parts IX.C.1 and IX.G.3.c of the Order, the City **shall**

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NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

**implement its approved WMP immediately.** The City is subject to all applicable compliance schedules in Part IV.B and Attachments K through S of the Order.

## 2) *Compliance Determinations*

### 2.1 Compliance Determination for WBPCs other than Trash

**2.1.1 Compliance Metric:** Pursuant to Part IX.B.7.h of the Order, the WMP is required to specify the expected volume capture, load reductions, or other compliance metrics at regular milestones, and the methods by which these reductions will be measured and demonstrated for each waterbody pollutant combination (WBPC) and supported via the RAA. Based on the information provided in the WMP, submitted on January 31, 2024, the Los Angeles Water Board will determine deemed compliance with the City's WMP based on the following compliance metrics per the approved compliance schedule:

- Table 1-34: Future Projects for WMP BMP Implementation

If the City fails to attain the San Gabriel River Watershed milestones specified in Section 1.11.3 of the WMP for the projects listed in Table 1-34, then the City shall lose deemed compliance status for its interim WQBELs. The City must then demonstrate compliance with final WQBELs through the direct demonstration of compliance options outlined in Part X.B.2.a of the Order or demonstrate that structural BMPs retain all non-stormwater runoff and the volume of stormwater runoff generated from the 85<sup>th</sup> percentile 24-hour storm event for the watershed area.

**2.1.2 WBPCs Eligible for Deemed Compliance Through Alternative Demonstration of Compliance:** The following WBPCs will receive deemed compliance through the WMP if the actions and schedules specified in the WMP are attained as outlined in Parts X.B.1.b and X.B.2.b of the Order:

- San Gabriel River Reach 3 for *E. coli* during wet weather

Note that since the additional conditions listed in the May 1, 2023 Conditional Approval Letter were not addressed, the City is not eligible to receive deemed compliance for additional WBPCs.

Any WBPCs that are not listed above are not eligible for deemed compliance for one or more of the following reasons: (a) for Category 1 WBPCs with interim deadlines, the WMP proposes watershed control measures for which there are no quantitative analyses that satisfy the RAA requirements, (b) the final TMDL deadline(s) have passed and there is no approved Time Schedule Order (TSO) or retention of all non-stormwater runoff and the volume of stormwater runoff from the 85<sup>th</sup> percentile 24-hour storm event, (c) the WMP only proposes the implementation of baseline Permit requirements, and/or (d) the WMP does not propose implementing additional structural BMPs and proposes to demonstrate compliance through monitoring.

## 2.2 Compliance Determination for Trash WBPCs

Trash WBPCs are not eligible for deemed compliance under the WMP. For Trash WBPCs, compliance shall be determined as outlined in Part X.C of the Order.

### 3) *Other Requirements*

**Adaptive Management:** Pursuant to Part IX.E.1 of the Order, the Permittee(s) shall implement an adaptive management process for each approved WMP. An adaptive management process is a periodic, comprehensive program evaluation, including re-analysis of data and/or modeling, and a modification process to determine progress toward achieving WQBELs and receiving water limitations and to adapt the Watershed Management Program to become more effective at achieving WQBELs and receiving water limitations. Pursuant to Part IX.E.4 of the Order, Permittee(s) shall submit the results of the adaptive management process with the Permittees' Report of Waste Discharge (ROWD) to the Los Angeles Water Board no later than **March 15, 2026**.

Per Part IX.E.3 of the Order, the adaptive management process fulfills the requirements in Part V.D of the Order to address continuing exceedances of receiving water limitations.

**Modifications:** The City may propose WMP modifications at any time during the term of the Order, as necessary. The City shall provide a standalone written request explaining the nature of the proposed modification(s) and justification for consideration by the Los Angeles Water Board. Such justification may include the need to align the timing of implementation for a specific project with a project partner that is not regulated by the Regional MS4 Permit.

If you have any questions about this letter, please contact Angineh Shahnazarian with the Municipal Stormwater Permitting Unit by email at [Angineh.Shahnazarian@waterboards.ca.gov](mailto:Angineh.Shahnazarian@waterboards.ca.gov) or by phone at (213) 576-6635. Alternatively, you may also contact Ivar Ridgeway, Municipal Stormwater Permitting Unit Supervisor by email at [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,

for Susana Arredondo  
Executive Officer

cc: Alma K. Martinez, City of El Monte