
Los Angeles Regional Water Quality Control Board

March 18, 2016

Ballona Creek Watershed Time Schedule Order Participants
(See Distribution List)

CONDITIONAL APPROVAL OF THE DRAFT POLLUTION PREVENTION PLAN SUBMITTED PURSUANT TO THE TIME SCHEDULE ORDER FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM DISCHARGES TO BALLONA CREEK, BALLONA ESTUARY, AND SEPULVEDA CHANNEL (ORDER NO. R4-2015-0108)

Dear Ballona Creek Watershed Time Schedule Order Participants¹:

The Los Angeles Regional Water Quality Control Board (Regional Water Board) is in receipt of the Ballona Creek Watershed Time Schedule Order Participants' (Group's) draft Pollution Prevention Plan (PPP), received on July 13, 2015. The Regional Water Board reviewed the draft PPP and has the following comments:

1. The potential adverse environmental impacts of the technologies used in LFTF-1; LFTF-2; and the Mesmer LFD must be analyzed. To the extent that analysis is currently available, it should be included in the PPP. The PPP can rely upon the upcoming evaluation of the LFTF-1 alternatives submittal to discuss potential adverse environmental impacts. To the extent that the potential adverse impacts would be the same for LFTF-2 and the Mesmer LFD, the LFTF-1 evaluation may serve as the analysis for these other two projects as well. Alternatively, if the potential impacts may be different and the analysis is not yet available, it should be provided in an update to the PPP as it is completed for each project (e.g., concurrent with the CEQA analysis for each project).
2. Figure 13 depicts the results of a QUAL2K simulation of baseline dry weather flows and *E. coli* concentrations in Ballona Creek. To demonstrate effectiveness of the PPP's projects and control measures, Tables 21 and 22 list the predicted *E. coli* concentrations and flow rates at downstream points under the PPP's implementation scenarios. In addition to this, the Group should provide discussion on the upstream sections of the watershed and describe the additional control measures in these areas, including but not limited to, implementation of the permit provisions regarding prohibition of non-storm water discharges (Part III.A.4); non-stormwater outfall based screening and monitoring programs (Attachment E, Part IX); and Participants' illicit discharge elimination programs (Parts VI.D.4.d and VI.D.10) under the Los Angeles County MS4 Permit.

¹ Ballona Creek Watershed Time Schedule Order Participants include the Los Angeles County Flood Control District; the County of Los Angeles; and the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, and West Hollywood.

Based on Regional Water Board staff review of the PPP, I am hereby conditionally approving the Group's PPP and directing the Group to update the PPP based on our comments, as listed above. The updated PPP shall be submitted to the Regional Water Board as soon as possible and no later than **April 18, 2016**.

The updated PPP must be submitted to losangeles@waterboards.ca.gov with the subject line "Ballona Creek Bacteria TSO - Updated PPP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Chris.Lopez@waterboards.ca.gov.

If you have any questions, please contact Mr. Ivar Ridgeway, Storm Water Permitting, via email or by phone at (213) 620-2150 or Mr. Chris Lopez via email or by phone at (213) 576-6674.

Sincerely,



Samuel Unger, P.E.
Executive Officer

cc: Jennifer Fordyce, Office of Chief Counsel, State Water Board

DISTRIBUTION LIST (VIA EMAIL)

Shahram Kharaghani
Division Manager
City of Los Angeles
Shahram.Kharaghani@Lacity.org

Daniel Cartagena
Senior Management Analyst
City of Beverly Hills
dcartagena@beverlyhills.org

Charles D. Herbertson
Director of Public Works/City Engineer
City of Culver City
charles.herbertson@culvercity.org

Lauren Amimoto
Senior Administrative Analyst
City of Inglewood
lamimoto@cityofinglewood.org

Sharon Perlstein
City Engineer
City of West Hollywood
Sperlstein@weho.org

Angela George
Principal Engineer
County of Los Angeles, DPW / LACFCD
ageorge@dpw.lacounty.gov