

# Peninsula EWMP Response to Comments

March 25, 2016

#	Comment and Necessary Revision	Response to Comments
1	Definitions Section: Revise the following definitions to be consistent with the LA MS4 permit definitions: Hydrologic Unit Code (HUC), Illicit Discharge (ID), Institutional Controls, Maximum Extent Practicable (MEP), National Pollutant Discharge Elimination System (NPDES), and Significant Ecological Areas (SEAs).	Revised.
2	Revise the second paragraph in Section 1.5.2 as follows: "The goal of the MS4 permit is to reduce the discharge of these pollutants from MS4s to the maximum extent practicable; <u>this may be accomplished</u> through the implementation of WMPs and EWMPs."	Revised.
3	For each project listed in Section 3.2.4.2 (Regional BMPs), clearly state what the design volume is, as well as what the 85th percentile storm volume is, and compare the two. For example, Section 3.2.4.2.1 states that the volume for Casaba Estates was designed to capture the 50-year storm event (5.1 acre-feet), which is "greater than the 85th percentile, 24-hour storm event," but the actual volume of the 85th percentile storm is not included.  Also, confirm and add text to Section 3.2.4.2 stating that "All proposed regional BMPs will either retain or capture and treat water up to the design storm specified for that project, including nonstormwater flows during dry weather."	<p>The 85<sup>th</sup> Percentile, 24-hr storm volume was calculated for the drainage area associated with each Existing, Planned, and Proposed Regional BMP and indicated in Table 3-5. For the Casaba Estates and Chandler Quarry Projects, the design volume was provided. This can be easily compared to the calculated 85<sup>th</sup> Percentile, 24-hr storm volume.</p> <p>As discussed during our phone conversation on Monday, March 21<sup>st</sup>, many of the areas within the Peninsula WMG are susceptible to land subsidence and infiltration is therefore infeasible. Because of these challenges, BMPs within these areas are designed as flow-through BMPs. In these cases, the design flowrate was indicated in Table 3-5 in lieu of the volume.</p> <p>For the Eastview Park Infiltration Project, where infiltration may be feasible, a volume was determined; however, the RAA model used was specific to the 90<sup>th</sup> Percentile, Critical Year. Therefore, only the volume retained <u>per year</u> can be provided at this time. This value has been provided in Table 3-5 with a note explaining as such. For comparison, it should be noted that the Eastview Park Infiltration Project was modeled for a 1-inch storm depth, which is greater than the 85<sup>th</sup> Percentile, 24-hr storm depth of 0.9-inch.</p> <p>The suggested design storm language has been included in Section 3.2.4.2.</p>
4	Clarify if the investigations assessed cost-effectiveness for each regional BMP in Section 3.2.4.2.3.	As described in Appendix 6, BMPs were identified in a prioritized manner. Prioritization was based on cost (low cost BMPs were prioritized); BMP effectiveness for the pollutants of concern (BMPs that had greater treatment efficiency for the pollutant of concern in a particular analysis region were prioritized over other BMPs); and implementation feasibility as determined by desktop screening. In general, non-structural BMPs were prioritized over structural BMPs due to their lower relative cost, and then structural BMPs were identified that would result in the greatest load reduction per dollar. This was accomplished by targeting land uses with the greatest percent imperviousness and highest pollutant loads and by using BMPs with the greatest performance, particularly for the controlling pollutant. This language has been added to Section 3.2.4.2.
5	Revise Section 3.2.2. to add clear interim milestones for the following non-structural TCMs: Private Road and Parking Lot Sweeping Ordinances and the Clean Bay Restaurant Certification Programs (in Palos Verdes Estates & Rolling Hills Estates).	<p>Agencies other than Rancho Palos Verdes do not plan on initiating Private Road and Parking Lot Sweeping Ordinance. Also, this is a <b>Potential</b> TCM for the City of Rancho Palos Verdes. A timeline will be determined upon making a final decision on whether or not to move forward with the ordinance.</p> <p>The Clean Bay Restaurant Program is planned to be implemented by the cities of Palos Verdes Estates and Rolling Hills Estates by July 2016.</p>

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6	<p>In Table 5-4 and throughout the EWMP revised the schedule dates to include a month and year not just a season and year. In addition, include a schedule for the Malaga Cove and Abalone Cove Water Reuse Projects. These are proposed projects; therefore, a proposed schedule should be provided.</p>	<p>Table 5-4 has been adjusted to include months rather than seasons for all dates within this and the next permit term.</p> <p>Malaga Cove and Abalone Cove Water Reuse Projects have been moved under the "Potential Regional BMP" section (Section 3.2.4.2.4) due delays and roadblocks encountered. These projects were included as additional opportunities. Compliance with water quality requirements is not contingent upon their implementation.</p>
7	<p>Table 2-9 does not match Tables 2-10 and 2-11:</p> <p>In Table 2-9, SMB 7-2 shows 100% as the percentage of years in compliance with allowable exceedance days for summer dry weather, but Table 2-11 shows that SMB 7-2 had an exceedance in 2013. (Per Table 2-7, SMB-2 is allowed 0 AEDs.)</p> <p>Also for Table 2-9, SMB 7-4 shows 100% for compliance with AED for winter dry weather, but Table 2-10 has an exceedance for SMB 7-4 in 2009. (Per Table 2-7, SMB 7-4 is allowed 0 AEDs.)</p> <p>Correct the tables or provide an explanation of why SMB 7-2 and SMB 7-4 have a 100% compliance rate even though they exceeded their allowable exceedance days.</p>	<p>Table 2-10 was incorrect in listing one exceedance for SMB 7-4 as this exceedance was observed on February 23, 2009, which is prior to the final compliance deadline of July 15, 2009. Table 2-10 has been revised to reflect as such.</p> <p>Table 2-9 was incorrect in listing 100% compliance for SMB 7-2. All data analyzed from 2003 through 2015 returns a compliance percentage of 92%. Table 2-9 has been revised to reflect as such. Please refer to the language provided below Table 2-9 and Table 2-12 explaining these rare exceedances and actions to be taken to address bacteria.</p>
8	<p>The Regional Board's comment (sent via letter in 2015):</p> <p><u>The revised EWMP must identify each participating Permittee responsible for implementing the existing/ planned/or proposed BMPs (see tables 3-4 and 5-4). In Table 5-4, clarify whether the Permittees identified in the column "Jurisdiction" will be wholly responsible for the structural TCM or if all Permittees listed in the column "Percent Drainage Area Per Jurisdiction" will share responsibility for implementing the structural TCM.</u></p> <p>The Group's response:</p> <p><i>"The regional projects as currently proposed need to go through preliminary engineering studies as well as other feasibility, ownership/easement, and environmental review before more accurate cost estimates can be arrived at to the level of certainty that is needed for the governing boards. This is not something that can be determined prior to EWMP approval. Additionally, in order for public agencies to approve funding for these projects, the plan would first need to be approved by the regulatory body, then each agency will need to provide their governing boards with a clear understanding of what the financial commitment would ultimately be and the timing/schedule of those disbursements.</i></p> <p><i>Although a definitive cost structure cannot be identified at this time, a schedule by which each study can be undertaken has been developed and provided in Section 5."</i></p> <p>The Group's response does not address the Regional Board's comment. Please indicate the Permittee(s) responsible for implementing each existing/ planned/or proposed BMPs listed in tables 3-4 and 5-4.</p>	<p>A column was added to Table 5-4 listing parties responsible for implementation.</p>
9	<p>In Section 6.3, include a timeline to search for funding with consideration of the milestones indicated in the EWMP.</p>	<p>Language has been added to Section 6.3 regarding a timeline to search for funding with consideration of the milestones for each BMP.</p>
10	<p>As discussed we discussed at the EWMP Workshop, include the additional project you mentioned to me.</p>	<p>A description was added to Section 3.2.4.2.3. Additionally, language was added to Section 3.2.4.2 describing the ability of the group to collaborate with the Regional Board to include alternative BMPs, if needed.</p>

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<p><b>Separate Request</b></p>	<p>Lately Regional Water Board staff has had the opportunity to give presentations on WMP and EWMP implementation to various groups. One piece of information that we'd like to better convey in these presentations is an estimate of the <i>total volume of stormwater that can be captured and retained</i> in LA County if all the WMPs and EWMPs are <u>fully</u> implemented.</p> <p>So in this email, we're asking if each WMP and EWMP Group can provide this information for their Group so that we can get a total estimate and a better picture of the region. Specifically, we'd like to get an estimate of the <b><u>annual volume of stormwater captured and retained</u></b>. This volume estimate should fit the following parameters:</p> <ul style="list-style-type: none"> <li>• <b><u>Units</u></b>: The estimate should be expressed in acre-ft per year</li> <li>• <b><u>Control Measures</u></b>: The estimate should be based upon full implementation of all the BMPs (e.g. regional projects, green streets, LID implementation, etc.) specified in the WMP/EWMP at the final compliance deadline</li> <li>• <b><u>Storm Year</u></b>: The estimate should be provided for both an "average" storm year and a "critical" storm year, if applicable and/or possible</li> </ul>	<p>Since our compliance metric was the <i>90th percentile year</i>, gathering information for the <i>average annual storm year</i> would require re-modeling efforts. Therefore, we have provided the volume of stormwater captured and retained <i>for the 90th percentile year, but not the average annual storm year</i>. This was deemed acceptable by the Regional Board via email on March 21, 2016.</p> <p>Based on results from the RAA for the 90<sup>th</sup> percentile year (TMDL Year 1995), the captured and retained volume of stormwater runoff estimated is <b>750 acre-ft</b>. This includes captured and retained stormwater runoff due to LID implementation, downspout disconnection incentive, existing/planned BMPs, and proposed regional BMPs.</p> <p>Please note that this estimate does not reflect an estimate of recharged groundwater, but is simply an estimate of the reduced amount of stormwater runoff leaving the Peninsula EWMP Area as a result of BMP implementation as discussed in the EWMP.</p> <p>These results have been added to Section 3 of the EWMP.</p>