



SUMMARY OF RESPONSES TO REGIONAL BOARD STAFF COMMENTS ON DRAFT WMPS

**For the Lower Los Angeles River and Lower San
Gabriel River Watershed Management Programs**

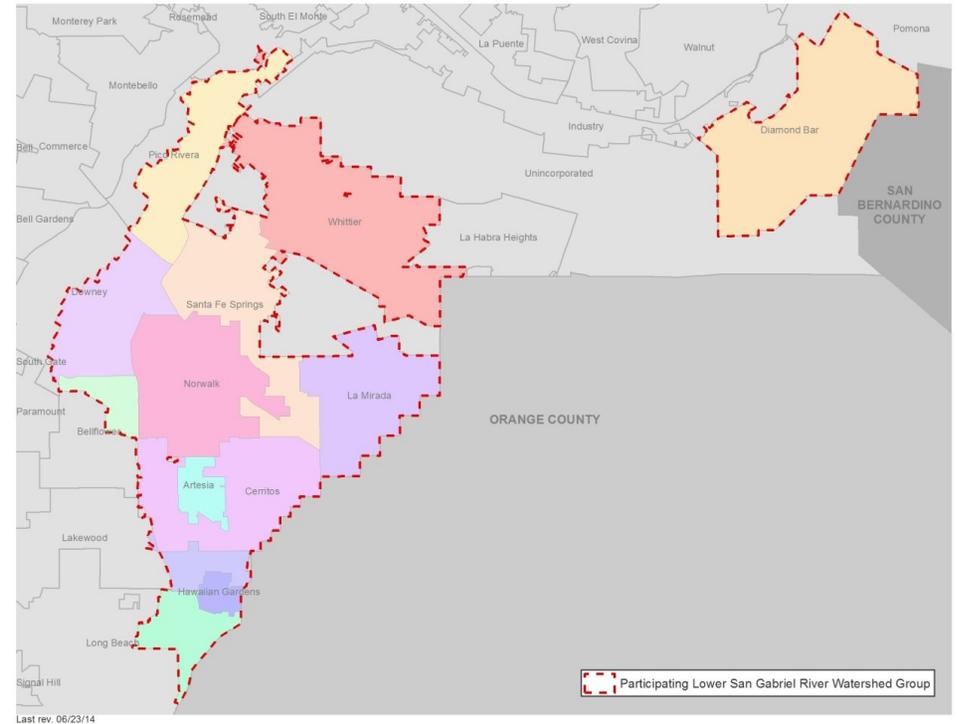
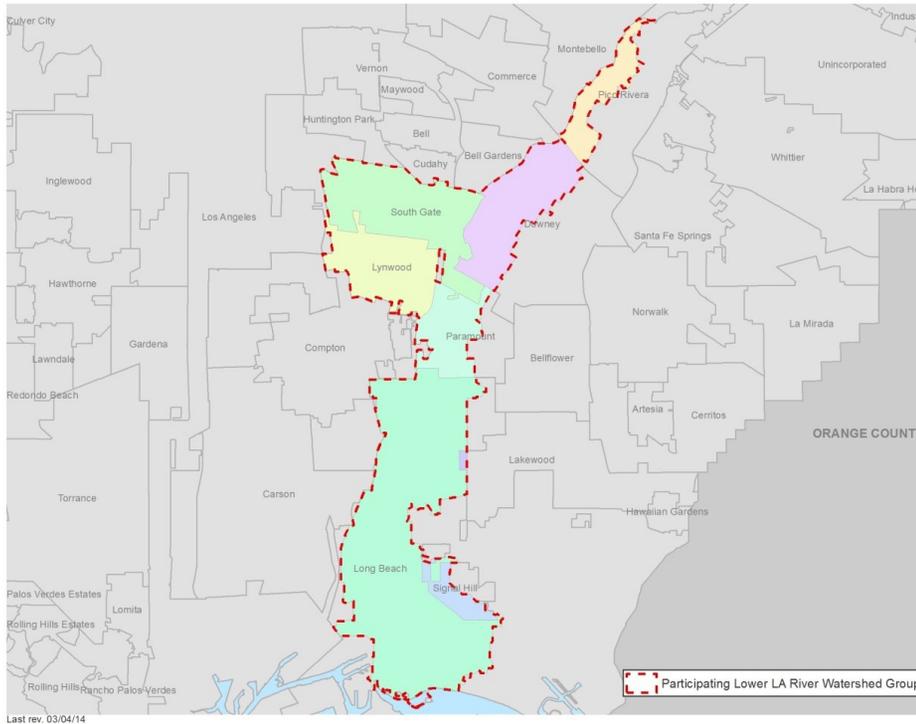
LARWQCB Public Meeting

April 13, 2015

INTRODUCTION

- Note WMP Group representatives met with Regional Board staff on 1/23/2015 to discuss responses
- Today we review the more pressing comments/responses (These are common to both watersheds and as such are addressed together in this presentation)

Watershed Group Maps



Between the two, Participating Agencies are:

Artesia, Bellflower, Cerritos, Diamond Bar, Downey, Hawaiian Gardens, Lakewood, La Mirada, Long Beach, Lynwood, Norwalk, Paramount, Pico Rivera, Santa Fe Springs, Signal Hill, South Gate, Whittier, and the Flood Control District



LOWER LA RIVER AND LOWER SG RIVER WMP

COMMENTS AND RESPONSES

WMP Comments

Comment ID		Comment Summary	Response
LLAR LSGR	p3, #3 RAA A.3 p2, #2 p4, #1	Provide more specificity on actions within current and next permit term in order to meet pollutant reductions.	WMP modified to increase degree of clarity and specificity regarding schedules and actions. This effort is the maximum practicable considering associated uncertainties. Greater certainty will be provided through adaptive management. Of particular note: A regional project assessment effort has been added.
			
LLAR LSGR	p3, #3 p3, #3	Commit to construct necessary # of green street conversions to meet compliance schedule.	See above response. Of particular note: Nexus with Gateway Strategic Transportation Plan has been added.
			

WMPs Lay out Compliance Approach

- Chapter 5 (Compliance Schedule) includes:
 - RAA load reductions and BMP capacities for each City
 - A specific compliance approach for interim limits
 - Institutional BMPs, ROW BMP capacity, and potential Regional BMPs
- Chapter 3 (Watershed Control Measures) includes:
 - Menu of potential Regional/LID BMPs for each City
 - Estimated Regional BMP capacities
 - R.O.W. map based on GIS file that has specificity for City use
 - Upcoming planned BMPs
- Reasonable Assurance Analysis includes:
 - Optimized schedule by subwatershed for each City
 - Optimized division of BMPs into types (Public LID, ROW, Regional)

Compliance Approach: Chapter 5

January 11, 2024 to meet the 50% interim compliance milestone, and 76.5 acre-feet by January 11, 2028 to meet the final compliance milestone.

If Ralph C. Dills Park was transformed into an infiltration BMP, the parks would have the potential of retaining 17.9 acre-feet of stormwater. Right-of-Way BMPs could be used for the remaining 3.0 acre-feet to meet the 31% compliance milestone.

If Spane Park was transformed into an infiltration BMP, the parks would have potential of retaining 5.3 acre-feet of stormwater. Right-of-Way BMPs could be used for the remaining 3.2 acre-feet to meet the 50% compliance milestone.

Example:
Compliance
path for
Paramount
w/ specific
BMPs

31% Interim Compliance Milestone	
Potential BMP Site	Potential Design Capture Volume (ac-ft)
Ralph C. Dills Park	17.9
Right-of-Way BMPs	3.0
Total	20.9
50% Interim Compliance Milestone	
Potential BMP Site	Potential Design Capture Volume (ac-ft)
<u>Spane</u> Park	5.3
Right-of-Way BMPs	3.2
Cumulative Total	29.3

Compliance Approach: Chapter 3

Table 3-13: Potential site list

**Example:
Paramount's
Regional BMP
list alone
meets final
milestone**

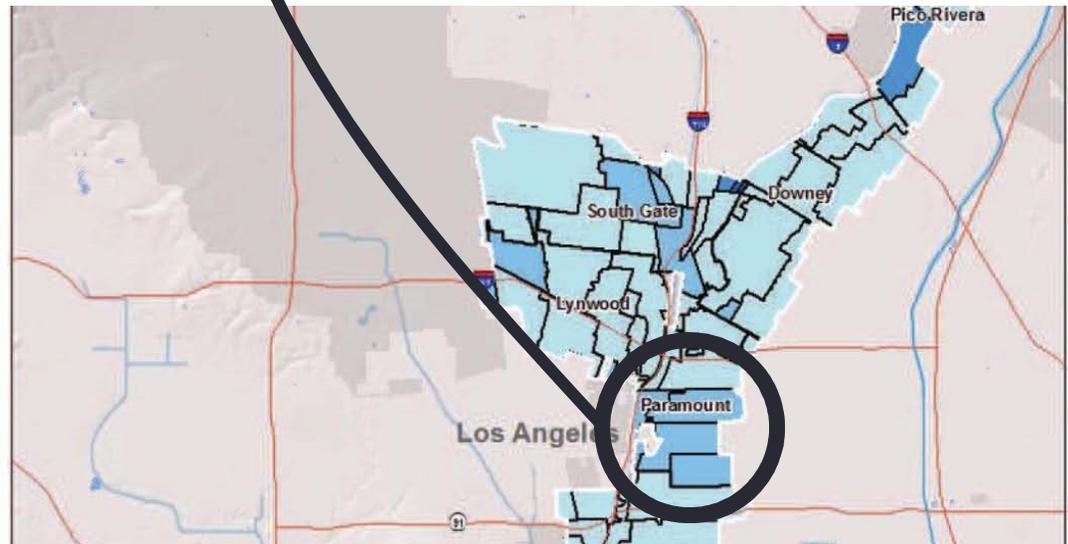
City Name	Land Use Designation	Site Name	Site Address	Latitude	Longitude	Area (Acres)	Area (Quadrantary, Acres)	Max Design Capture Volume (DCV, Ac-ft)	
Paramount	Open Space & Recreation	Ralph C. Dills Park	6500 San Juan St.	33.9001	-118.1843	14.1	217	17.9	
		Paramount Park	14400 Paramount Blvd.	33.9018	-118.159	12.5	182	15.0	
		Spane Park	14400 Gundry Ave.	33.9029	-118.1759	4.4	64	5.3	
		Village Skate Park	7718 Somerset Blvd.	33.8959	-118.1649	0.7	10	0.9	
		Meadows Park	15753 Gundry Ave.	33.8895	-118.1751	0.7	9	0.8	
		open space	Somerset Blvd.	33.8965	-118.1837	0.4	5	0.4	
	Educational Use	Elementary School	Excluded for privacy				8.1	117	9.7
		School	Excluded for privacy				4.3	62	5.1
		Elementary School	Excluded for privacy				3.3	49	4.0
		Elementary School	Excluded for privacy				3.2	46	3.8
		School	Excluded for privacy				2.8	41	3.4
		School	Excluded for privacy				2.0	30	2.5
		High School	Excluded for privacy				1.8	27	2.2
		Elementary School	Excluded for privacy				1.7	25	2.1
	Elementary School	Excluded for privacy				1.5	21	1.8	
Total		15 Potential Projects						75	
Pico Rivera	Open Space & Recreation	Rio Hondo Park	8421 San Luis Potosi Pl.	34.0119	-118.0921	11.9	172	14.2	
		park	Calico Ave.	34.0175	-118.084	1.4	21	1.7	
	Educational	open space	Cope Dr.	34.0147	-118.087	3.1	45	3.8	

WMPs Lay out Approach: RAA

Subwatershed maps and tables optimize type and placement of BMP for each City

B1.5. City of Paramount

Subwatershed	Milestone	COMPLIANCE TARGET	POLLUTANT REDUCTION PLAN				
		Remaining MS4 Responsible Critical Year Volume (acre-ft/year)	Existing Distributed BMP Volume (acre-ft)	Total Estimated Right-of-Way BMP Volume (acre-ft)	Estimated Potential LID on Public Parcels Volume (acre-ft)	Remaining BMP Volume (Potentially Regional BMPs) (acre-ft)	Total BMP Volume to Achieve Compliance (acre-ft)
6069	31%	0.0	-	-	-	-	-
6071	Final	120.7	0.0	4.9	0.9	9.9	15.6
6072	Final	172.9	0.0	7.6	1.1	13.9	22.6
6073	Final	61.4	-	1.9	0.2	4.6	6.6
6075	31%	163.7	-	9.0	1.7	10.2	20.9
6076	50%	65.7	-	7.4	0.8	0.3	8.6
6078	Final	21.7	-	0.5	0.0	1.8	2.3
6080	Final	-	-	-	-	-	-
Grand Total		606.1	0.1	31.2	4.7	40.6	76.6



Additional BMP Specificity

- Groups understand need for specificity
- ROW BMPs:
 - Group does not see utility in listing all potential street projects
 - WMPs provide necessary ROW BMP capacities for each City
 - RAA includes GIS list of prioritized streets for use by Cities
 - **NEW:** WMP states that ROW BMPs will be tied into Gateway Strategic Transportation Plan
- Regional BMPs:
 - **NEW:** WMP commits to Regional BMP assessment in each City
 - **March 2016:** Preliminary site assessment and feasibility study
 - **December 2016:** Field analysis including ground truthing

Additional BMP Specificity

- Group emphasizes that biennial adaptive management provides mechanism to refine compliance approach



WMP Comments

Comment ID		Comment Summary	Response
LLAR LSGR	p3, #3 p3, #1 RAA A.1	Provide additional support for the 10% pollutant reduction due to non-structural controls.	WMP Sec. 4.3 added to address. (Should be 10% for "non-modeled" controls. Structural LID ordinance implementation was not modeled.) Includes support for ~3% reduction from TSS Reduction Program. With new MCMs (~5%) and LID ordinance implementation (~2%), 10% is a modest assumption. Groups also commit to evaluation of assumptions through Adaptive Management Process.
LLAR LSGR	p4, #1 p5, #3	Provide additional support for 25% reduction in irrigation.	WMP Sec. 4.2.1 added to address. Literature review conducted and relevant support provided.

WMP Comments

Comment ID		Comment Summary	Response
LLAR LSGR	p3, #1 p2, #2	Demonstrate that compliance schedule ensures compliance as soon as possible.	Clarifying language included in Chapter 5, following ASAP as defined in MS4 Permit VI.C.2.a.ii.(4) <i>“...a timeframe(s) that is as short as possible, taking into account the technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary.”</i>
LLAR LSGR	p7, #1 p5, #1 RAA A.3	Demonstrate that “limiting pollutant” approach will achieve compliance for each priority pollutant	Addressed in Compliance Schedule (Chapter 5).
LLAR LSGR	p3, #2 p3, #1	Address potential for shorter compliance timeframes for non-TMDL priority pollutants	Addressed in Compliance Schedule (Chapter 5).

WMP Comments

Comment ID		Comment Summary	Response
LLAR LSGR	p1, #3 p3, #2	Include date for initial prioritization of industrial/commercial facilities.	Addressed in Watershed Control Measures (Chapter 3).
LLAR LSGR	p2, #1 p2, #1	Provide a process/timeline to develop a drainage area map and database for major outfalls.	Drainage areas for individual outfalls are not readily available. Defining these areas requires significant resources. The Group proposed to provide drainages areas for major outfalls with significant discharges and outfalls where stormwater monitoring will be conducted. This task will be completed within one year of WMP approval.

RAA-specific Comments

Comment ID		Comment Summary	Response
LLAR LSGR	RAA B.1 RAA B.1	Incorporate upstream flow volume to improve model performance.	Addressed
LLAR LSGR	RAA B.2 RAA B.2	Provide summary tables of baseline loads for pollutants of concern.	Included
LLAR LSGR	RAA B.3 RAA B.3	Provide time series plots comparing baseline loads and allowable loads for the critical year.	Included
LLAR LSGR	RAA B.4 RAA B.4	Explain lack of modeling for organics (DDT, PCBs, PAHs)	Explained
LLAR LSGR	RAA B.5 RAA B.5	Provide volume, required volume reductions, and proposed reductions from BMPs for subbasins.	Included
LLAR LSGR	RAA B.6 RAA B.6	Include a commitment to collect data necessary to calibrate future models for non-stormwater.	Included
LLAR LSGR	RAA B.7 RAA B.7	Include subwatershed ID numbers from model input file in RAA.	Included

Current and Upcoming Activities

- Monitoring: Outfall screening/nonstormwater characterization
- Planned control measures include (but are not limited to):
 - Prop 84 Grant implementation (Multi-jurisdictional LID projects)
 - Exposed soil ordinance
 - South Gate Urban Orchard
 - Long Beach's Municipal Urban Stormwater Treatment facility

Current and Upcoming Activities



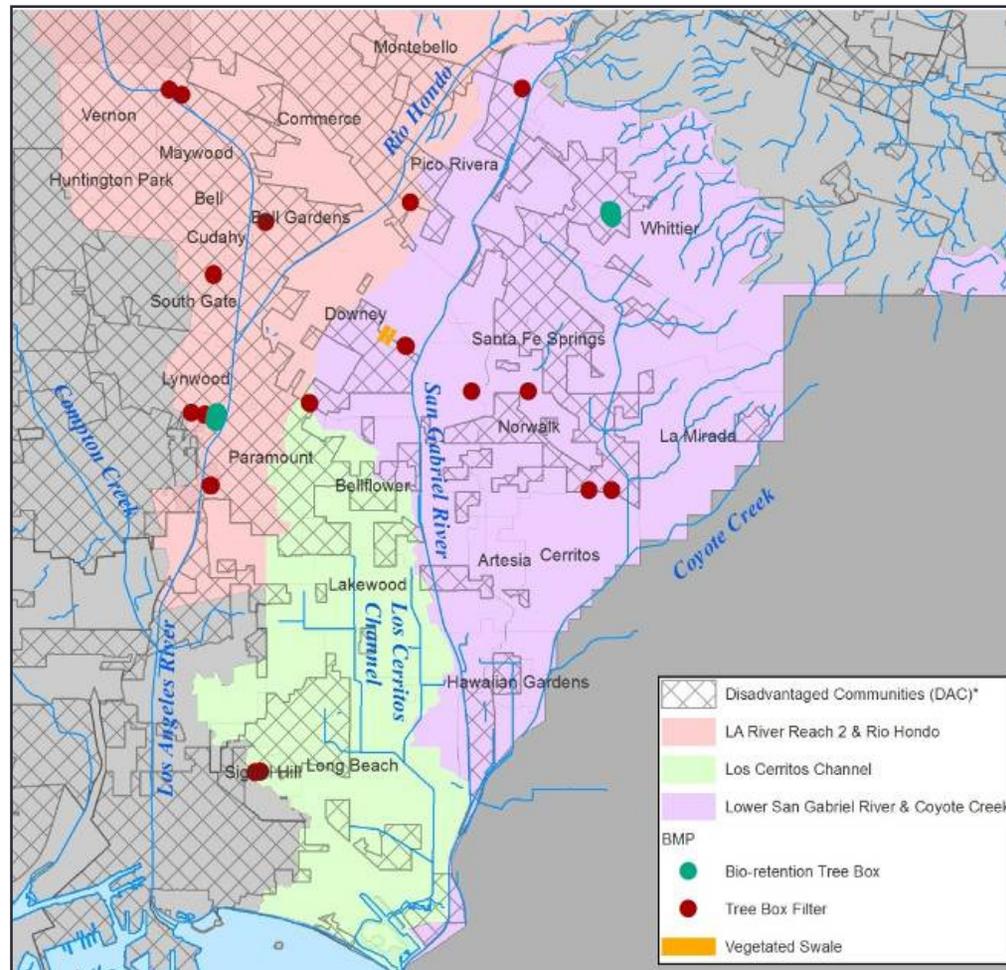
Non-stormwater Outfall Screening

Current and Upcoming Activities



Exposed Soil Ordinance

Current and Upcoming Activities



Prop 84 Grant implementation (Multi-jurisdictional LID projects)

Current and Upcoming Activities



South Gate Urban Orchard (multi-benefit project using recycled stormwater)

Current and Upcoming Activities



Long Beach Municipal Urban Stormwater Treatment facility

Photo of Santa Monica's Urban Runoff Recycling Facility.
Accessed from <http://www.smgov.net/Departments/PublicWorks/ContentWater.aspx?id=8051>

Current and Upcoming Activities

- Groups are working cooperatively, meeting regularly, and drafting MOUs for the WMP/CIMP implementation phase



THANK YOU

And Good Day from the Lower LA and Lower SG River
Watershed Groups