



Los Angeles Regional Water Quality Control Board

February 25, 2022

Beach Cities Watershed Management Group¹

Via Email

STATUS OF COMPLIANCE DEMONSTRATION SUBMITTED BY JUNE 30, 2021 PER THE STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2020-0038; NOTICE OF CONTINUED DEEMED COMPLIANCE STATUS

Dear Beach Cities Watershed Management Group:

State Water Resources Control Board (State Water Board) Order WQ 2020-0038 (2020 SB Order), directed Permittees to submit documentation by June 30, 2021, demonstrating that all work associated with current and prior milestones had been completed to retain deemed compliance with the receiving water limitations, water quality-based effluent limitations, and other TMDL-specific limitations addressed by the Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP).²

On May 26, 2021, the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) issued a letter via email to all Permittees participating in WMPs and EWMPs with direction on how to submit the aforementioned information.³

The Los Angeles Water Board reviewed the Beach Cities Watershed Management Group's (Beach Cities Group) document(s) submitted on June 30, 2021, to assess the Beach Cities Group's demonstration of completion of all work associated with current

¹ (Permittees of the Beach Cities Watershed Management Group EWMP include the Cities of Redondo Beach, Hermosa Beach, Manhattan Beach, Torrance, and the Los Angeles County Flood Control District.)

² (2020 SB Order, at p. 167 available at https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2020/wqo2020_0038.pdf [as of August 31, 2021].)

³ (Letter from Executive Officer Renee Purdy, Los Angeles Water Board, to Los Angeles County MS4 Permittees Participating in WMPs and EWMPs (May 26, 2021), at p. 2.)

and prior milestones according to the requirements set forth by the 2020 SB Order and to determine the Beach Cities Group’s deemed compliance status.⁴

The Los Angeles Water Board Approval Letter dated April 18, 2016, outlined the actions and milestones that the Beach Cities Group needed to complete to maintain deemed compliance status. The tasks listed in Table 1 below, have been identified as past due obligations and milestones occurring after EWMP Approval that should have been completed prior to June 30, 2021.

Table 1: Beach Cities Group Required Actions

Required Actions	Implementation Update ⁵
Implementation of baseline Minimum Control Measures (MCMs) requirements per Table 2-8 of the Aug. 2019 Beach Cities EWMP. ⁶	This task was met. Baseline MCMs are maintained by all Cities per Table 2-8 of the Aug. 2019 Beach Cities EWMP. Furthermore, Section 2.1.1 of the June 2021 Revised Draft Beach Cities EWMP states that MCMs have been effectively implemented on an ongoing basis.
Implementation of the following Enhanced MCMs per Table 2-8 of the March 2018 Beach Cities EWMP. ⁷ <ul style="list-style-type: none"> • Take Progressive Enforcement by Jan. 1, 2016. (Torrance) • Develop Integrated Pest Management education materials by June 2017. (Manhattan Beach, Hermosa Beach) • Implement Business Assistance Program by Jan. 1, 2016. (Torrance) 	These tasks were met. The proposed enhanced progressive enforcement by the City of Torrance was updated to the baseline requirement according to the Aug. 2019 Beach Cities EWMP, Table 2-8. Table 2-8 further indicates that the rest of the proposed enhancements were implemented as listed. Furthermore, the June 2021 Revised Draft Beach Cities EWMP summarizes the proposed MCMs enhancements in Table C-1 of Appendix C.

⁴ (Revised Draft Beach Cities Watershed Management Group Updated Beach Cities Enhanced Watershed Management Program [June 2021 Revised Draft Beach Cities EWMP] and corresponding document(s), June 2021.)

⁵ (Based on Board staff’s review of the Beach Cities Watershed Management Group’s (Beach Cities Group) document(s) submitted on June 30, 2021, containing the Beach Cities Group’s demonstration of completion of all work associated with current and prior milestones.)

⁶ (The original approved Beach Cities EWMP, dated February 9, 2016, was revised August 2019, as part of the Adaptive Management Process. The actions and milestones outlined in the April 18, 2016, approval still apply.)

⁷ (The Los Angeles Water Board evaluated compliance with this task using the 2018 version of Table 2-8 because this table was updated in the August 2019 Beach Cities EWMP to reflect completion of all enhanced MCMs.)

<ul style="list-style-type: none"> • Develop retrofit opportunity inventory, evaluate, and rank by Jan. 1, 2016. (Torrance) • Develop written procedures for Illicit Connection/Discharge Program by Jan. 1, 2016. (Torrance) 	
<p>Implementation of the following compliance actions associated with Dominguez Channel (DC) Watershed Water Body Pollutant Combinations by the dates in Table 4-2 of the Aug. 2019 Beach Cities EWMP:</p> <ul style="list-style-type: none"> • Documentation supporting MCM enhancements. (Dec. 2016 and Dec. 2017) • Identify Green Street locations in Redondo Beach/Manhattan Beach. (Dec. 2018) • City Council approval of Green Street projects in Redondo Beach/Manhattan Beach. (Dec. 2019) • Develop concept reports for regional BMPs in Redondo Beach/Manhattan Beach. (Dec. 2020) • Begin construction on green streets to treat runoff from 3% of target land use. (Dec. 2020) 	<p>The following tasks were met.</p> <ul style="list-style-type: none"> • Documentation supporting MCM enhancements: Provided based on the updates to the MCM Enhancements provided in Table C-1 in Appendix C of the June 2021 Revised Draft Beach Cities EWMP. • Identification of Green Street locations in Redondo Beach/Manhattan Beach: The Redondo Beach Dominguez Channel Distributed Infiltration Project and the Manhattan Beach Dominguez Channel Distributed Infiltration Project were identified per pp. 35 and 37 of the June 2021 Revised Draft Beach Cities EWMP. • City Council approval of Green Street Projects: These projects were reviewed and adopted by each respective City Council per p. A-6 of the June 2021 Revised Draft Beach Cities EWMP. • Concept factsheets of Regional and Distributed BMPs are included in Appendix E of the June 2021 Revised Draft Beach Cities EWMP. Furthermore, Redondo Beach and Manhattan Beach are project partners for the Alondra Park Stormwater Capture Project. A project concept and details for this regional BMP are provided on pp. 33-35 of the June 2021 Draft Revised Beach Cities EWMP, which also states that more information regarding this project can be found in the Alondra Park Regional Project Safe Clean Water Feasibility Study Report (Los Angeles County, 2019).

	<ul style="list-style-type: none">• Sufficient distributed projects have been completed, meeting the milestones of addressing 3% of target land use by 2021 and 7% of target land use by 2026 per p. 52 of the June 2021 Revised Draft Beach Cities EWMP.
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Based on the Los Angeles Water Board's review of the Beach Cities Group's document(s) submitted, the Beach Cities Group completed the tasks necessary to demonstrate compliance with all milestones in its EWMP that were required to be completed after EWMP approval and prior to June 30, 2021, as required by the 2020 SB Order.

Therefore, the Beach Cities Group has maintained deemed compliance status for the water body-pollutant combinations addressed by the EWMP until June 30, 2022, while its existing or revised WMP⁸ undergoes review by the Los Angeles Water Board for consistency with the 2020 SB Order and the 2021 Regional MS4 Permit. To maintain deemed compliance status during this review period, the Group must continue to implement its existing EWMP. After the WMP review period concludes (no later than June 30, 2022), the Group will only be allowed to maintain deemed compliance status if it is implementing an approved WMP that satisfies the requirements in 2020 SB Order and the 2021 Regional MS4 Permit.

If you have any questions, please contact Ms. Susana Vargas of the Municipal Stormwater Permitting Unit by email at Susana.Vargas@waterboards.ca.gov. Alternatively, you may also contact Mr. Ivar Ridgeway, Municipal Stormwater Permitting Unit Supervisor by email at Ivar.Ridgeway@waterboards.ca.gov.

Sincerely,

Renee Purdy
Executive Officer

⁸ (The 2012 LA MS4 Permit (Order No. R4-2012-0175 as amended) allowed Permittees to develop a WMP or EWMP. The Regional MS4 Permit (Order No. R4-2021-0105) adopted on July 23, 2021 eliminated the distinction between a WMP and EWMP and all these programs are now all called "WMPs".)