



Los Angeles Regional Water Quality Control Board

February 25, 2022

Dominguez Channel 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 INCOMPLETE SUBMITTAL

Dear Dominguez Channel 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 Dominguez Channel Watershed Management Area Group's (DC Group) document(s) submitted on June 29, 2021, to assess the DC Group's demonstration of completion of all work associated with current

¹ (Permittees of the Dominguez Channel Watershed Management Area Group include the Los Angeles County Flood Control District; the County of Los Angeles; and the cities of Carson, El Segundo, Hawthorne, Inglewood, Lawndale, Lomita, and Los Angeles.)

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 DC Group’s deemed compliance status.⁴

The Los Angeles Water Board Approval Letter dated April 21, 2016, outlined the actions and milestones that the DC 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: DC Group Required Actions

Required Actions	Implementation Update
Implementation of MCMs/Institutional BMPs per Table 4.2 of the Feb. 2016 DC EWMP.	It is unclear if the DC Group completed this task.
Implementation of the following MCM enhancements (Machado Lake Watershed) identified in Table 4.3 of the Feb. 2016 EWMP: <ul style="list-style-type: none"> • Enhanced street sweeping with vacuum sweepers by 2017 (Lomita, County unincorporated) • Full capture devices by 2016 (Carson, Lomita, Los Angeles, County Unincorporated) • Catch basin cleanouts of full capture devices by Spring 2016 (Carson, Lomita, Los Angeles, County Unincorporated) 	It is unclear if the DC Group completed this task.
Implementation of the following MCM enhancements (non-Machado Lake Areas) identified in Table 4.4 of the Feb. 2016 EWMP: <ul style="list-style-type: none"> • Enhanced street sweeping with vacuum sweepers by 2017 (El Segundo, Hawthorne, Inglewood, Lawndale, Lomita) 	It is unclear if the DC Group completed this task.

⁴ (Enhanced Watershed Management Program for the Dominguez Channel Watershed Management Area Group [June 2021 Revised Draft DC EWMP] and corresponding document(s), June 2021.)

<ul style="list-style-type: none"> • Enhanced street sweeping with vacuum sweepers by 2019 (County Unincorporated) • Full capture devices by 2017 (Carson, Lawndale, County Unincorporated) • Catch basin cleanouts of full capture devices by 2017 (Carson, Lawndale, County Unincorporated) 	
<p>Determine whether the following structural BMPs identified in Table 5.1 of the Feb. 2016 DC EWMP should be further pursued and identify potential funding mechanisms by December 2017:</p> <ul style="list-style-type: none"> • City of Inglewood - Darby Park • City of El Segundo - El Segundo Pump Station • Hawthorne, LA County - Ramona Park • Hawthorne - Jim Thorpe Park • Hawthorne - Hawthorne Memorial Park • City of Los Angeles, LA County - Chester Washington Golf Course • Lomita, City of LA, LA County - Harbor City Park • City of LA - Wilmington Recreation Center • City of LA - Averill Park • El Segundo, Hawthorne, Lawndale, LA County - Alondra Park • City of Carson - Carriage Crest Park • City of Carson - City Hall/ Civic Center 	<p>This task was partially completed. The following information was obtained from the June 2021 Revised Draft DC EWMP:</p> <ul style="list-style-type: none"> • Darby Park - update provided in Section 5.2.2; project will be submitted for Measure W feasibility study funding in July 2021. • El Segundo Pump Station - was completed per p. 5-3; project will be submitted for Measure W feasibility study funding in July 2021. • Ramona Park – project found to not be feasible per p. 4-15. • Jim Thorpe Park - update provided in Section 5.2.2; project will be submitted for Measure W feasibility study funding in July 2021. • Hawthorne Memorial Park - found to not be feasible per p. 4-15. • Chester Washington Golf Course – no update provided. • Harbor City Park - update provided in Section 5.2.2; LA County received \$300,000 for a feasibility study for this project. • Wilmington Recreation Center - update was provided in Table 5.1; estimated completion year is 2032. • Averill Park - update was provided in Table 5.1; estimated completion year is 2032. • Alondra Park - update provided in Section 5.2.2; project estimated to be completed in 2023; multiple cities have contributed funding.

	<ul style="list-style-type: none"> • Carriage Crest Park – project completed per Section 5.2.2. • City Hall/Civic Center - update provided in Section 5.2.2; site remains a good candidate for infiltration; City will conduct a feasibility study by 2026.
<p>Implementation of total BMP capacity (acre-feet) by 2017 (31% Milestone) per Table 1 in Appendix AB of the Feb. 2016 DC EWMP:</p> <p>Carson:</p> <ul style="list-style-type: none"> • LA River Watershed – 1.3 	<p>No information was provided regarding this milestone.</p>

Based on the Los Angeles Water Board’s review of the DC Group’s document(s) submitted, the DC Group has failed to provide the Los Angeles Water Board with sufficient information to evaluate compliance as demonstrated in Table 2, below.

Table 2: Supplemental Information Needed

Required Action	Missing Information
Implementation of MCMs/institutional BMPs per Table 4.2 of the Feb. 2016 DC EWMP.	No information provided on implementation of MCMs and institutional controls to be implemented to comply with the 2012 MS4 Permit.
Implementation of the MCM enhancements (Machado Lake) identified in Table 4.3 of the Feb. 2016 EWMP.	<p>No information provided on the status of the following Enhanced MCMs:</p> <ul style="list-style-type: none"> • Enhanced street sweeping with vacuum sweepers by 2017 (Lomita, County unincorporated) • Full capture devices by 2016 (Carson, Lomita, Los Angeles, County Unincorporated) • Catch basin cleanouts of full capture devices by Spring 2016 (Carson, Lomita, Los Angeles, County Unincorporated)

<p>Implementation of the MCM enhancements (non-Machado Lake Areas) identified in Table 4.4 of the Feb. 2016 EWMP.</p>	<p>No information provided on the status of the following enhanced MCMs:</p> <ul style="list-style-type: none"> • Enhanced street sweeping with vacuum sweepers by 2017 (El Segundo, Hawthorne, Inglewood, Lawndale, Lomita) • Enhanced street sweeping with vacuum Sweepers by 2019 (County Unincorporated) • Full capture devices by 2017 (Carson, Lawndale, County Unincorporated) • Catch basin cleanouts of full capture devices by 2017 (Carson, Lawndale, County Unincorporated)
<p>Determine whether the following structural BMPs identified in Table 5.1 of the Feb. 2016 DC EWMP should be further pursued and identify potential funding mechanisms by December 2017:</p> <ul style="list-style-type: none"> • City of Los Angeles, LA County - Chester Washington Golf Course 	<p>No information was provided on the status of the following project:</p> <ul style="list-style-type: none"> • Chester Washington Golf Course
<p>Implementation of total BMP capacity (acre-feet) by 2017 (31% Milestone) per Table 1 in Appendix AB of the Feb. 2016 DC EWMP:</p> <p>Carson:</p> <ul style="list-style-type: none"> • LA River Watershed – 1.3 	<p>No information was provided regarding the following milestone:</p> <p>Carson:</p> <ul style="list-style-type: none"> • LA River Watershed – 1.3 (acre-feet)

The DC Group must provide supplemental information demonstrating compliance with all milestones for which the Los Angeles Water Board lacked sufficient information to determine compliance **within 30 days**. Failure to submit this information within 30 days will result in automatic loss of deemed compliance status. Deemed compliance status may be regained upon approval of a revised WMP.⁵

⁵ (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”.)

Submit supplemental documents via the LA Water Board's FTP Site:

- FTP site link: <https://ftp.waterboards.ca.gov>
Username: RB4MS4-Upload
Password: RB4-bmBb3Z

Alternatively, please contact Ms. Susana Vargas via email at Susana.Vargas@waterboards.ca.gov for alternative accommodations for submittals.

If you have any questions, please contact Ms. Susana Vargas of the Municipal Stormwater Permitting Unit by email. 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