

## Los Angeles Regional Water Quality Control Board

December 9, 2016

John C. Dettle, P.E.  
Engineering Manager  
City of Torrance, Public Works Department  
20500 Madrona Avenue  
Torrance, CA 90503

**APPROVAL OF THE CITY OF TORRANCE'S REVISED MACHADO LAKE SUBWATERSHED SUPPLEMENT TO THE BEACH CITIES ENHANCED WATERSHED MANAGEMENT PROGRAM (EWMP), PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175 AS AMENDED BY STATE WATER BOARD ORDER WQ 2015-0075)**

Dear Mr. Dettle:

On November 8, 2012, the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). Part VI.C of the LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs).

Pursuant to Part VI.C.4.c.iv of the LA County MS4 Permit, the City of Torrance (City) submitted the Machado Lake Nutrient and Toxics Total Maximum Daily Load (TMDL) BMP Implementation Plan as Appendix D (Supplement) to the Beach Cities Watershed Management Group's (Group or Beach Cities)<sup>1</sup> draft EWMP on June 26, 2015 to the Los Angeles Water Board for review. After receiving a Notice of Unsatisfactory Submittal from the Los Angeles Water Board on April 28, 2016, the City submitted a revised Machado Lake Subwatershed Supplement (Supplement) on October 11, 2016 and supporting Reasonable Assurance Analysis (RAA) files on October 27, 2016 to the Board for review and approval.

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<sup>1</sup> Permittees of the Beach Cities Watershed Management Group include the Cities of Redondo Beach, Hermosa Beach, Manhattan Beach, and Torrance, and the Los Angeles County Flood Control District.

## **Public Review and Comment**

On October 31, 2016, the Los Angeles Water Board provided public notice and a 30-day period to allow for public review and written comment on the City's revised Machado Lake Subwatershed Supplement. No comments were received during the review period.

## **Los Angeles Water Board Review**

Concurrent with the public review, the Los Angeles Water Board reviewed the City's revised Supplement submitted in October 2016. A revised Supplement was submitted on November 17, 2016 and November 29, 2016 to address the Board's remaining concerns.

## **Approval of Revised Supplement**

The Los Angeles Water Board hereby approves the City's November 29, 2016 revised Supplement to the Beach Cities EWMP.

## **Determination of Compliance with EWMP**

Pursuant to Part VI.C.6 of the LA County MS4 Permit, the City of Torrance shall begin implementation of the approved Beach Cities EWMP Supplement for Machado Lake subwatershed immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the Supplement, the City must fully and timely implement all actions per associated schedules set forth in the approved Supplement regardless of any contingencies indicated in the approved Supplement (e.g., funding) unless a modification to the approved Supplement, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii of the LA County MS4 Permit. The Los Angeles Water Board will determine the City's compliance with the Supplement on the basis of the compliance actions and milestones included in the Supplement including, but not limited to, the following:

- Section 1.3.3.1 Walteria Lake
- Table 4.1 Existing MCM/Institutional Solutions Conducted by City of Torrance
- Table 4.2 Potential Institutional Solutions by Pollutant Source
- Table 4.3 Proposed New and Enhanced Institutional BMPs Descriptions
- Figure 5.3 Potential BMP Sites within TMDL Implementation Area
- Table 5.5 Volume Reduction Based on Re-Development by Sub Area
- Table 5.9 Subcatchment AS1 (Airport Sub Area) Volume and Load Reduction Summary
- Table 5.10A Subcatchments AS2 and AS3 (Airport Sub Area) Nutrient and Toxics Load Reduction Summary for Option 2 – Recommended Option
- Table 5.10B Subcatchments AS2 and AS3 (Airport Sub Area) Metals and Bacteria Load Reduction Summary for Option 2 – Recommended Option
- Table 5.21A Walnut Sump Sub Area Nutrient and Toxics Volume/Load Reduction
- Summary for Option 1 - Recommended Option
- Table 5.21B Baseball Field Sub Area Metals and Bacteria Load Reduction Summary



- for Option No.1 - Recommended Option
- Table 6.3 Summary of Expected Phosphorus Removal
- Table 7.1 Estimated Reductions in Stormwater TSS Loads
- Section 8.0 Implementation Schedules
- Table 8.1 Schedule or Work Plan Elements
- Table 8.2 Proposed Implementation Schedule for Nonstructural Solutions
- Table 8.3 Implementation Schedule for Structural Projects

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4).(a) of the LA County MS4 Permit, the City's full and timely compliance with all actions and dates for their achievement in their approved Supplement shall constitute compliance with permit provisions pertaining to applicable water quality-based effluent limitations (WQBELs)/wasteload allocations (WLAs) in Part VI.E and Attachment N Parts B-D of the LA County MS4 Permit. Further, per Part VI.C.2.b of the LA County MS4 Permit, the City's full compliance with all requirements and dates for their achievement in its approved Supplement constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit for the specific waterbody-pollutant combinations addressed by the approved Supplement.

If the City fails to meet any requirement or date for its achievement in the approved Supplement, which will be demonstrated through the Group's Annual Reports and program audits (when conducted), the City shall be subject to the baseline requirements of the LA County MS4 Permit, including but not limited to demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4).(c) of the LA County MS4 Permit.

### **Annual Reporting**

The City shall report, on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through the Group's Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit. For multi-year efforts, the City shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention projects, including LID BMPs implemented in compliance with new/redevelopment provisions, green streets provisions, and regional BMPs, the City shall report annually on the volume of stormwater retained in each subwatershed area.

The City shall also include in the Group's Annual Report, the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in their Supplement per Part VI.A.3 of the LA County MS4 Permit. Further, as part of the annual certification concerning a City's legal



authority required by Part VI.A.2.b of the LA County MS4 Permit, the City shall also certify in the Annual Report that they have the necessary legal authority to implement each of the actions and milestones in the approved Supplement as required by Part VI.C.5.b.iv.(6). If the City does not have legal authority to implement an action or milestone at the time the Group submits the Annual Report, the City shall propose a schedule to establish and maintain such legal authority.

### **Adaptive Management**

The City shall conduct a comprehensive evaluation of their Supplement no later than two years after the date of the Beach Cities EWMP approval (i.e., by April 18, 2018), and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the LA County MS4 Permit. As part of this process, the City must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment N Parts B-D of the LA County MS4 Permit according to the milestones set forth in their Supplement;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

Per Part VI.C.8.a.iv, the City shall also report the following information to the Los Angeles Water Board as part of the reporting for the adaptive management process:

- On-the-ground structural control measures completed;
- Non-structural control measures completed;
- Monitoring data that evaluates the effectiveness of implemented control measures in improving water quality, including the effectiveness of catch basin filters at reducing bacterial pollutant loads;
- Comparison of the effectiveness of the control measures to the results projected by the RAA;
- Comparison of control measures completed to date with control projected by the RAA;
- Comparison of control measures completed to date with control measures projected to be completed to date pursuant to the Supplement;
- Control measures proposed to be completed in the next two years pursuant to the Supplement and the schedule for completion of those control measures; and
- Status of funding and implementation for control measures proposed to be completed in the next two years.

Finally, as part of the adaptive management process, the City shall also re-evaluate their Category 2 and Category 3 water quality priorities based on data collected through the Group's Coordinated Integrated Monitoring Program (CIMP) for the City's discharges. Where new water quality priorities are identified, the City shall conduct a RAA for the pollutants and identify and incorporate into their Supplement appropriate watershed control measures to address them.

The City's evaluation of the above shall be based on both progress implementing actions in the Supplement and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit, the City shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the City's Supplement area that are collected through the Group's CIMP and other data, as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the Supplement, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The City must implement any modifications to the Supplement upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that while the first adaptive management process is due by April 18, 2018, the Beach Cities Watershed Management Group's ROWD is due no later than July 1, 2017. The City should conduct a preliminary evaluation of its Supplement in the spring of 2017 and present the results of the evaluation and any proposed modifications to the Supplement in the Group's ROWD.

Additionally, as part of the adaptive management process, the Beach Cities Watershed Management Group may choose to modify their EWMP to incorporate the Machado Lake subwatershed WBPCs within the City of Torrance's jurisdiction rather than addressing them through the Supplement.

The Los Angeles Water Board appreciates the participation and cooperation of the Permittees in the Beach Cities Watershed Management Group and the City of Torrance in the implementation of the LA County MS4 Permit. If you have any questions, please contact Ms. Erum Razzak of the Storm Water Permitting Unit at [Erum.Razzak@waterboards.ca.gov](mailto:Erum.Razzak@waterboards.ca.gov) or by phone at (213) 620-2095. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, at [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.  
Executive Officer



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