March 27, 2014

Mr. Steve Aspel, Mayor
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

Mr. Mike Witzansky, Public Works Director
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

Mr. Tom Bakaly, City Manager
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

Mr. David N. Carmany, City Manager
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, CA 90266

Mr. Frank Scotto, Mayor
City of Torrance
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Torrance, CA 90503

Ms. Gail Farber, Chief Engineer
Los Angeles County Flood Control District
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

APPROVAL OF REVISED NOTIFICATION OF INTENT TO DEVELOP AN ENHANCED WATERSHED MANAGEMENT PROGRAM FOR THE BEACH CITIES WATERSHED MANAGEMENT GROUP, PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees participating in the Beach Cities Watershed Management Group:

In a letter dated December 2, 2013, the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board or Board) provided its review of the Beach Cities Watershed Management Group's (Beach Cities) notification of intent (NOI) to develop an enhanced watershed management program (EWMP). As part of their NOI, Permittees pursuing an EWMP are required to identify, and commit to fully implement by June 28, 2015, a structural best management practice (BMP) or suite of BMPs at a scale that provides meaningful water quality improvement within each watershed covered by the EWMP. The structural BMP(s) must be in addition to BMPs that are required to meet interim or final trash TMDL effluent limitations or other final effluent limitations applicable in the watershed with deadlines prior to April 28, 2016. The structural BMP(s) identified in the NOI are subject to Executive Officer approval. The NOI identified the Torrance Stormwater Basin Recharge and Enhancement project and the Manhattan Beach Greenbelt Infiltration System project in the Santa Monica Bay Watershed Management Area (WMA) and accelerated implementation of Machado Lake Trash TMDL project in the Dominguez Channel Watershed as the structural BMPs to meet the above mentioned requirement.

In its letter, the Board requested additional information about the water quality improvements to be achieved by the Torrance Stormwater Basin Recharge and Enhancement project. Specifically, for the Board to fully evaluate the Torrance Stormwater Basin Recharge and Enhancement project, Permittees needed to provide the size of drainage area, volume of storm water addressed, or an estimate of pollutant load reductions.

On December 17, 2013, the Regional Water Board received the revised NOI for the Beach Cities EWMP. Board staff has reviewed the revised NOI for compliance with all notification requirements of Part VI.C of the permit and has determined that all the notification requirements have been met. Pursuant to Part VI.C.4.b.iii.(5) of the permit, the proposed structural best management practices (BMPs) are subject to approval by the Regional Water Board Executive Officer.

The City of Torrance proposes to implement the Torrance Stormwater Basin Recharge and Enhancement project. The project will retrofit three existing detention basins within the Santa Monica Bay Watershed serving a drainage area of 1,453 acres within the City of Torrance. Currently, the basins provide temporary detention for storm water and urban runoff. During the winter period discharges from these basins have been pumped to the Herondo Storm Drain, which discharges to the Santa Monica Bay, while the summer period flows from these basins have been pumped to a storm drain discharging to the Dominguez Channel. The project will treat all storm water from the 1,453-acre drainage area for multiple pollutants, including trash and sediments by a combination of wetland treatment and infiltration. The project will capture and recharge an estimated 20 acre-feet per year of runoff that would have otherwise been discharged to the Santa Monica Bay. The project will eliminate all discharges from the drainage area to the Dominguez Channel; will eliminate dry weather discharges to Santa Monica Bay; and will reduce wet weather discharges to the Santa Monica Bay from this system. The Torrance Stormwater Basin Recharge and Enhancement project provides significant advances over the current system by providing treatment of storm water and non-storm water at the detention basins.

The Board has concluded that the Torrance Stormwater Basin Recharge and Enhancement project will result in meaningful water quality improvements in the Dominguez Channel Watershed by eliminating all discharges from the 1,453-acre drainage area to the Dominguez Channel. In addition, the project will provided meaningful water quality improvements to the Santa Monica Bay by eliminating dry weather discharges and reducing wet weather discharges to Santa Monica Bay from these basins. Therefore, the proposed Torrance Stormwater Basin Recharge and Enhancement project is approved.

With regard to the Manhattan Beach Greenbelt Infiltration System, the City of Manhattan Beach completed the project on February 19, 2013, less than two months after the permit's effective date of December 28, 2012. While this is a laudable project, as the project was near completion when the permit was adopted in November 2012, it does not meet the intent of the permit requirement to identify and commit to implement a structural BMP [Part VI.C.4.b.iii.(5)].

With regard to the City of Torrance's accelerated implementation of the Machado Lake Trash TMDL through installing 631 Automatic Retractable Screens by December 2014, while this is commendable, it is not eligible to meet the requirement to identify and commit to implement a structural BMP within 30 months. Pursuant to the permit, Part VI.C.4.b.ii, this project is a watershed control measure that is being implemented to achieve compliance with the Machado Lake Trash TMDL. The final compliance date for the Machado Lake Trash TMDL is March 6, 2016, which occurs prior to approval of the Beach Cities EWMP. Therefore, the project does not

meet the requirement of part VI.C.4.b.iii.(5) to implement a structural BMP in addition to watershed control measures implemented to achieve compliance with final WQBELs occurring prior to approval of the EWMP.

Again, the Regional Water Board commends the Beach Cities for their proactive implementation of the Manhattan Beach Greenbelt Infiltration System project and accelerated implementation of the Machado Lake Trash TMDL. While these two projects do not qualify to meet the "early action" structural BMP permit requirement, as stated earlier, the Torrance Stormwater Basin Recharge and Enhancement project fulfills the permit requirement for both watershed management areas covered by the Beach Cities EWMP.

The work plan for development of the Beach Cities EWMP is due by June 28, 2014. Please submit the work plan to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Enhanced Watershed Management Program Work Plan" with copies to Ivar.Ridgeway@waterboards.ca.gov and Rebecca.Christmann@waterboards.ca.gov.

The If you have any questions, please contact Mr. Ivar Ridgeway, Storm Water Permitting, at (213) 620-2150 or Ms. Rebecca Christmann at (213) 576-6786.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

cc: Brad Lindahl, City of Redondo Beach
Elaine Jeng, City of Redondo Beach
Frank Senteno, City of Hermosa Beach
Tony Olmos, City of Manhattan Beach, Public Works Director
Raul Saenz, City of Manhattan Beach
John Dettle, City of Torrance
Gary Hildebrand, Los Angeles County Flood Control District
David Smith, NPDES Program, USEPA Region IX
Jennifer Fordyce, Office of Chief Counsel, State Water Board