

Los Angeles Regional Water Quality Control Board

October 22, 2015

Permittees of the Beach Cities Watershed Management Group¹
(See Distribution List)

REVIEW OF THE BEACH CITIES WATERSHED MANAGEMENT GROUP'S DRAFT ENHANCED WATERSHED MANAGEMENT PROGRAM, 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)

Dear Permittees of the Beach Cities Watershed Management Group:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the draft Enhanced Watershed Management Program (EWMP) submitted on June 26, 2015 by the Beach Cities Watershed Management Group (Group). This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop an EWMP to implement the requirements of the Los Angeles County MS4 Permit on a watershed scale through customized strategies, control measures, and Best Management Practices (BMPs). Participation in an EWMP is voluntary.

The purpose of an EWMP is for Permittees to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. Additionally, an EWMP comprehensively evaluates opportunities, within the participating Permittees' collective jurisdictional area (within the Watershed Management Area), for collaboration among Permittees and other partners on multi-benefit regional projects that, wherever feasible, retain all non-storm water runoff and all storm water runoff from the 85th percentile, 24-hour storm event for the drainage areas tributary to the projects, while also achieving other benefits including flood control and water supply.

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.

If Permittees opt to develop an EWMP, the EWMP must meet all requirements of Part VI.C (Watershed Management Programs) of the LA County MS4 Permit. This in part, requires Permittees to include multi-benefit regional projects to ensure that MS4 discharges achieve compliance with all final WQBELs set forth in Part VI.E and do not cause or contribute to exceedances of receiving water limitations. An EWMP must be approved by the Los Angeles Water Board, or by its Executive Officer on behalf of the Board.

As stated above, on June 26, 2015, the Group submitted a draft Enhanced Watershed Management Program (EWMP) for their entire jurisdiction to the Los Angeles Water Board pursuant to Part VI.C.4.c.iv of the LA County MS4 Permit.

Public Review and Comment

On July 1, 2015, the Board provided public notice and a 61-day period to allow for public review and comment on the draft EWMPs. A separate notice of availability regarding the draft EWMPs was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received two letters that contained comments specific to the Group's draft EWMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper and the other letter was from Construction Industry Coalition on Water Quality (CICWQ). On July 9, 2015, the Board held a workshop at its regularly scheduled Board Meeting on the draft EWMPs. During the review of the draft EWMPs, the Los Angeles Water Board considered those comments applicable to the Group's draft EWMP.

Los Angeles Water Board Review

Concurrent with the public review, the Los Angeles Water Board reviewed the draft EWMP. During its review, staff of the Los Angeles Water Board had a meeting on October 15, 2015, telephone exchanges, and email exchanges with the Group's representatives and consultants to discuss the Board staff's questions, tentative comments and potential revisions to the draft EWMP.

The Los Angeles Water Board has reviewed the draft EWMP and has determined that, for the most part, the draft EWMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, some revisions to the Group's draft EWMP are necessary. The Los Angeles Water Board's comments on the draft EWMP, including detailed information concerning revisions to the RAA, are found in Enclosure 1 and Enclosure 2, respectively. The LA County MS4 Permit includes a process through which necessary revisions to the draft EWMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final EWMP, revised to address Los Angeles Water Board comments identified in the enclosures, must be submitted to the Los Angeles Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revision to the draft EWMP as identified in the enclosures to this letter and submit the revised EWMP as soon as possible and no later than **January 20, 2016**.

The revised EWMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Beach Cities EWMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Erum.Razzak@waterboards.ca.gov.

If the necessary revisions are not made and the Group does not ultimately receive approval of its EWMP within 40 months of the effective date of the LA County MS4 Permit, the Group will be subject to the baseline requirements in Part VI.D and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachments M and N pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft EWMP is approved, the Group is required to:

- (a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv).
- (b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii);
- (c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters; and
- (d) Where possible, implement watershed control measures, from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash WQBELs and all other final WQBELs and receiving water limitations pursuant to Part VI.E and set forth in Attachments M and N by the applicable compliance deadlines occurring prior to approval of an EWMP.

If you have any questions, please contact Ms. Erum Razzak of the Storm Water Permitting Unit by electronic mail at Erum.Razzak@waterboards.ca.gov or by phone at (213) 620-2095. Alternatively, you may also contact Mr. Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosures: Enclosure 1 – Comments and Necessary Revisions to Draft EWMP
Enclosure 2 – Comments on the Reasonable Assurance Analysis
Beach Cities Watershed Management Group Distribution List

Los Angeles Regional Water Quality Control Board

Enclosure 1 – Summary of Comments and Necessary Revisions to Draft EWMP

Beach Cities Watershed Management Group

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
General		
Page ES-3 and Figure ES-1; Page 1-4 & Figure 1-1		Clarify whether the Del Amo Basin also has no outlet, as it appears from Figure ES-1 and Figure 1-1 to also be excluded from the EWMP.
Table ES-8		Revise Table ES-8 of the draft EWMP to clarify that for metals, the WLA assigned to MS4 discharges is a mass-based allocation based on the freshwater targets for Dominguez Channel and Torrance Lateral (using ambient hardness at the time of sampling) multiplied by the daily volume and is shared amongst all MS4 Permittees that discharge to the freshwater portion of Dominguez Channel and Torrance Lateral. The table may include a note that MS4 Permittees may demonstrate compliance with the freshwater metals allocations for Dominguez Channel and Torrance Lateral may be demonstrated via any one of three different means: a. Final allocations are met. b. CTR total metals criteria are met instream. c. CTR total metals criteria are met in the discharge.
Section 3.6.4		Correct the typographical error in Section 3.6.4 subsection Powerline Easement Filtration of the draft EWMP to substitute "Error! Reference source not found." with the applicable figure reference.
Table 4-2 footnote 2		Correct the typographical error in Table 4-2 of the draft EWMP where the reference to footnote 2 is missing from the table.
Figure ES-2, 2-5, Table ES-4, & 2-6		Add outfall SMB O-07 to Figure ES-2, Figure, 2-5, Table ES-4, and Table 2-6 of the draft EWMP.
Table ES-5, ES-10, & 6-2		Clarify that the storage volume in Table ES-5, ES-10, and 6-2 of the draft EWMP are design storage volumes (i.e., effective depth X footprint of the BMP).
Table 2-11 & 2-13		Update Table 2-11 and 2-13 of the draft EWMP to correctly label "Treatment Volume" as "Design Storage Volume".
Water Quality Characterization		
Section 2.2.1 & 3.2.1	Part VI.C.5.a.i (page 60)	Section 3.2.2 under subsection Category 3 – Medium Priority in part summarizes the evaluation of data that were considered for Dominguez Channel Watershed. Section 2.2.1 and 3.2.1 of the draft EWMP must specify if the EWMP includes an evaluation of existing water quality conditions, including characterization of

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		stormwater and non-stormwater discharges from the MS4 as well as receiving water quality to support identification and prioritization/sequencing of management actions, to the extent possible based on available data. Describe what data were used (e.g., wet and dry weather mass emissions station and tributary monitoring in Dominguez Channel per 2001 Permit, TMDL monitoring, regional monitoring conducted through the Bight monitoring program, bioassessment monitoring data).
Water Body Pollutant Classification		
Executive Summary	Part VI.C.5.a.ii (page 60)	The last sentence of the Executive Summary under the Dominguez Channel Watershed section of the draft EWMP states the following: <i>“These parameters will be monitored under the Beach Cities’ CIMP and if future monitoring data suggest that the Beach Cities’ MS4s may cause or contribute to cadmium exceedances in the receiving water, the EWMP will be revised to address these pollutants.”</i> It is unclear if the re-evaluation of CIMP data applies to only cadmium exceedances as aforementioned or it also applies to ammonia (for Dominguez Channel) and category 3 pollutants for Torrance Lateral. Clarify that the re-evaluation of CIMP data applies to all category 2 and category 3 pollutants.
Table ES-7, 3-4, ES-8, 3-6, ES-12, 4-2 & Section 3.2.2	Part VI.C.5.a.ii.(1) (page 60)	As per Attachment K Table K-13, the City of Torrance is subject to the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL) for Dominguez Channel Estuary. Therefore, revise Table ES-7, Table 3-4, Table ES-8, Table 3-6, Table ES-12, Table 4-2, and Section 3.2.2 subsection Category 1 of the draft EWMP to include the Water Body-Pollutant Combinations (WBPCs) for Dominguez Channel Estuary. Additionally, revise relevant sections of the EWMP (e.g., source assessment, watershed control measures, RAA, etc.) to address WBPCs for Dominguez Channel Estuary. Alternatively, provide a rationale and support for why Dominguez Channel Estuary WBPCs will not be addressed in the EWMP.
Section 2.2.2 footnote 9	Part VI.C.5.a.ii.(1) (page 60)	Section 2.2.2, footnote 9 of the draft EWMP shall also address the sediment toxicity 303(d) listing for Santa Monica Bay by summarizing USEPA’s data evaluation, which showed only 3 out of 116 samples exhibited toxicity. USEPA made a finding in the TMDL that, following the California listing policy, Santa Monica Bay is meeting the toxicity objective and there is sufficient evidence to delist sediment toxicity. EPA therefore concluded in the TMDL that there is no significant toxicity in Santa Monica Bay and recommended that Santa Monica Bay not be identified as impaired by toxicity in the California’s next 303(d) list.
	Part VI.C.5.a.ii (page 60)	Revise the draft EWMP to clearly specify all applicable interim and final numeric Water Quality Effluent Limits/Receiving Water Limits (WQBELs/RWLs) (for both dry weather and wet weather, where

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
Executive Summary, Table ES-7, 3-4, & Section 3.2.2	Part VI.C.5.a.ii.(2) (page 60)	<p>applicable) for Category 1, 2, and 3 WBPCs.</p> <p>Revise Table ES-7, Table 3-4, and Section 3.2.2 of the draft EWMP to include ammonia as a category 2 pollutant for Dominguez Channel (including Torrance Lateral), while referring to the discussion on pages ES-17 and page 3-6 in the main body of the EWMP. Include the monitoring data from monitoring sites S28 and TS19 referenced on page ES-17 and page 3-6 that indicates that ammonia objectives are being achieved. The group may also present data and information regarding the contribution, or lack thereof, of ammonia from MS4 discharges to Dominguez Channel, if available.</p> <p>Additionally, in the Executive Summary under the subsection for Dominguez Channel Watershed and in Section 3.2.2, include a brief discussion to explain why diazinon is not included as a category 2 pollutant for Dominguez Channel (including Torrance Lateral), by citing findings in the Harbors Toxics TMDL Staff Report, which states, <i>“Whereas elevated diazinon levels had been observed concurrently with toxicity in 2002-2005 wet weather samples and therefore diazinon was presumed to be contributing to adverse toxicity results; post-2005 results show no diazinon concentrations above the freshwater guideline. Therefore, it is appropriate to develop freshwater metals and toxicity TMDLs for wet weather; however, the more recent toxicity results are not attributable to diazinon and therefore no diazinon TMDLs have been developed for Dominguez Channel”</i> (Section 2.6.1 of TMDL Staff Report).</p>
Source Assessment		
Section 3.2.3	Part VI.C.5.a.iii.(1). (a) (page 60-61)	Section 3.2.3 of the draft EWMP must include a source assessment discussion on 303(d) listed pollutants ammonia and diazinon. (See comments above.)
Selection of Watershed Control Measures		
Executive Summary	Part VI.C.5.b (page 62-66)	<p>The Executive Summary under BMPs – Santa Monica Bay states that <i>“It should be noted that if at any time in the future, specific distributed green streets or regional/centralized BMPs are found to be infeasible for implementation, alternative BMPs or operational changes will be planned within the same subwatershed and within the same timeline, to meet an equivalent subwatershed load reduction. In addition, if monitoring data indicate that more easily implementable, alternative BMPs can provide equivalent (or superior) load reductions, these alternative BMPs may be implemented at the discretion of the WMG Agencies.”</i> Likewise, the Executive Summary in the BMPs – Dominguez Channel section of the draft EWMP states the following: <i>“It should be noted that if at any time specific distributed green streets or regional/centralized</i></p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p><i>BMPs are found to be infeasible for implementation, or new innovative BMPs are developed, alternative BMPs or operational changes will be planned within the same analysis region and within the same timeline, to meet an equivalent analysis region load reduction. The performance of the proposed catch basin inlet filters within the City of Torrance will also be evaluated as potential alternatives to the proposed structural BMPs within the Cities of Redondo Beach and Manhattan Beach.</i>" This is a reasonable approach. However, the Group should provide timely notification to the Regional Board of any project substitutions and provide project details.</p>
<p>Executive Summary footnote 2 & Section 1.2 footnote 8</p>	<p>Part VI.C.5.b.iv.(3) (page 64)</p>	<p>The Executive Summary footnote 2 and Section 1.2 footnote 8 of the draft EWMP states that "[f]or reference, the [Machado Lake Nutrients and Toxics TMDL] Implementation Plan is attached to this EWMP as Appendix D, but it should be reviewed separately from this EWMP." Therefore, the EWMP does not address Machado Lake TMDLs (i.e., trash, nutrients, pesticides, and PCBs). Although the implementation of the Machado Lake Implementation Plan is an acceptable approach, the Machado Lake BMP Implementation Plan (October 2014) as a stand-alone document does not adequately address all the requirements of an EWMP.</p> <p>Note that as per Attachment K Table K-4 of the LA County MS4 Permit, the City of Redondo Beach and the City of Torrance are subject to the Machado Lake TMDLs. Additionally, as per the LA County MS4 Permit, the Group must incorporate control measures that have been identified in applicable implementation plans. Therefore, the Machado Lake Implementation Plan should be considered a part of the EWMP where Machado Lake TMDLs should be addressed by the EWMP for the City of Redondo Beach and City of Torrance. If the Machado Lake Implementation Plan already addresses the applicable sections of the EWMP, the EWMP should summarize that section and reference the appropriate section in the Machado Lake Implementation Plan. Note that if the Machado Lake WBPCs (Category 1, 2, and 3) are not addressed in the EWMP, those WBPCs will be subject to baseline requirements of the LA County MS4 Permit, including Part V.A and Part VI.E and corresponding attachments.</p>
<p>Figure ES-3, ES-5, & 4-1</p>	<p>Part VI.C.5.b.iv.(4). (d) (page 64)</p>	<p>As per Figure ES-3 of the draft EWMP, 6 out of the 7 proposed BMPs will be implemented starting 2017. Clarify whether this implies that the construction of those 6 BMPs will be completed by 2017. If not, include clear completion dates for each of the BMPs.</p> <p>Likewise, as per Figure ES-5 of the draft EWMP, all proposed BMPs will be implemented starting 2020. Clarify whether this implies that the construction of these BMPs will be completed by 2020. If</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>not, include clear completion dates for each of the BMPs.</p> <p>Additionally, clarify the same as above for Figure 4-1 of the draft EWMP.</p>
Table ES-12 and 4-2	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>For category 3 pollutants, Table ES-12 and Table 4-2 of the draft EWMP states that <i>“As required by the Permit, monitoring for these pollutants will occur under the CIMP. If monitoring data suggest that the Beach Cities Agencies’ MS4s may cause or contribute to exceedances of these pollutants in the receiving water, these contributions will be addressed through modifications to the EWMP as a part of the adaptive management process, as described in Permit section VI.C.2.a.iii.”</i> This is an acceptable approach. However, the Group should consider that proposed BMPs for metals and bacteria may address category 3 pollutants (cyanide, pH, selenium, mercury, and cadmium). Therefore, Table ES-12 and Table 4-2 must list a milestone for category 3 pollutants consistent with the Harbor Toxics TMDL. As already stated in Table ES-12 and Table 4-2, CIMP data can be evaluated and modifications can be made through adaptive management.</p>
Table ES-12 and 4-2	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>Table ES-12 and Table 4-2 of the draft EWMP list December 2016 and December 2017 as milestones to provide documentation supporting MCM enhancements implemented over the past year to address wet weather bacteria in Dominguez Channel. Clarify whether all MCM enhancements to address bacteria in Dominguez Channel will be implemented by December 2017.</p>
Table ES-12 and 4-2	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>Table ES-12 and 4-2 of the draft EWMP list “Current” as a milestone for the Harbor Toxics TMDL interim metals WQBELs (wet weather) for Dominguez Channel and Torrance Lateral. Indicate with a footnote in Table ES-12 and Table 4-2 if the Group is currently in compliance with the interim WQBELs. If not, the Group shall commit to evaluating compliance through the CIMP.</p>
Table 2-7	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>Table 2-7 of the draft EWMP lists proposed MCM enhancements. Include milestones for the proposed MCM enhancements or indicate for each, whether the MCM enhancement is already being implemented by the Permittee(s).</p>
Section 2.3.3 & 3.3.3	Part VI.C.5.b.ii.(1) (page 62)	<p>In the non-stormwater sections of the EWMP, it is unclear if dry weather BMPs proposed reduce dry weather bacteria loads and/or eliminate or prevent non-stormwater discharge. For specificity, state in Section 2.3.3 and 3.3.3 of the draft EWMP that watershed control measures proposed for non-stormwater discharges meet the requirements as set forth in Parts III.A and VI.D.4.d and VI.D.10 of the LA County MS4 Permit.</p> <p>Additionally, propose milestones to prevent and/or eliminate all non-stormwater discharges.</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
Section 2.6.4, Table ES-11, & 3-12		<p>Table ES-11 and Table 3-12 of the draft EWMP show that mainly, catch basin inlet filters will be used to achieve the target load reduction for metals and bacteria in the City of Torrance. Footnote 3 states the following: <i>“Load reduction sum cannot be estimated at this time. The individual load reduction for each inlet filter’s drainage area is shown under the “Distributed BMPs” column. Initially, 200 of 643 catch basins are planned to be retrofitted in high priority catchments. Therefore, the total load reduction from inlet filters will be evaluated in the future through monitoring, and the BMPs will be modified through the adaptive management process, with additional filters installed as necessary to meet the TLRs by the compliance deadlines.”</i> Additionally, Section 3.6.4 subsection Proposed Distributed BMPs includes a discussion on catch basin inlet filters and Appendix B provides documentation that was used for reference.</p> <p>Although the manufacturer’s guidelines and several studies are referenced and relied on, the efficiency of these catch basin inserts to remove pollutants from the MS4 must be re-evaluated using data from the CIMP during the adaptive management process. At that time, additional structural/non-structural BMPs must be proposed as needed to achieve the target load reduction required to meet water quality objectives.</p>
Section 3.7.1	Part VI.C.5.a.iv.(2). (a) (page 62)	Section 3.7.1 of the draft EWMP shall state if watershed control measures proposed using zinc as a controlling pollutant in the Dominguez Channel watershed address not only other Category 1 pollutants, but also all Category 2 and Category 3 pollutants in Dominguez Channel.
Section 3.3.3	Part VI.C.5.b.ii.(1) (page 62)	Section 3.3.3 of the draft EWMP under Non-Stormwater Discharge Measures refers to Section 2.3.3 of the draft EWMP. However, the 7 LFDs referenced in Section 2.3.3 eliminate non-stormwater discharges in the Santa Monica Bay watershed. It is uncertain if the aforementioned LFDs eliminate non-stormwater discharge to the Dominguez Channel watershed. Therefore, include a discussion in Section 3.3.3 of the draft EWMP to elaborate on how non-stormwater discharge is addressed in the Dominguez Channel watershed.
Enhanced Watershed Management Program Provisions		
Table ES-5, ES-10, & 6-2	Part VI.C.1.g (page 49)	Table ES-5, ES-10, and 6-2 of the draft EWMP must specify with a footnote if all the listed projects were modeled in the RAA and sized to meet Water Quality Based Effluent Limits (WQBELs) and receiving water limits (RWLs).
Section 1.3	Part VI.C.1.g.ii (page 49)	Section 1.3 of the draft EWMP must specify if applicable if other State agency priorities are addressed (e.g., drought response, increased capture of stormwater for beneficial use per the

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		Recycled Water Policy, Strategic Plan priorities, California Water Action Plan priorities, etc.). If so, elaborate.
	Part VI.C.1.g.vi (page 50)	The draft EWMP must state if the cost analysis done in the EWMP maximizes the effectiveness of funds through the analysis of alternatives and the selection and sequencing of actions needed to address human health and water quality related challenges and non-compliance. If so, elaborate.
Section 2.6.4 & 3.6.4	Part VI.C.1.g (page 49)	<p>Section 2.6.4 under subsection Summary of Proposed Regional BMPs states the following: <i>“Four regional BMPs are proposed in the Santa Monica Bay Watershed portion of the Beach Cities EWMP Area. None of these projects could be feasibly sized to meet the 85th percentile design criteria.”</i> Similarly, Section 3.6.4 under subsection Summary of Proposed Regional BMPs states the following: <i>“Two regional BMPs are proposed in the Dominguez Channel portion of the Beach Cities EWMP Area. None of these projects could be feasibly sized to meet the 85th percentile design criteria.”</i></p> <p>State if the proposed regional BMPs that were modeled were sized to meet target load reductions necessary to achieve applicable water quality based effluent limitations and receiving water limitations.</p>
Section 2.8 and 3.8	Part VI.C.1.g (page 49)	Include a discussion of the anticipated multiple benefits for each of the four regional BMPs proposed in the Santa Monica Bay Watershed and the two regional BMPs proposed in the Dominguez Channel Watershed.
Section 2.6.4	Part VI.C.4.b.iii.(5) (page 56)	Update Section 2.6.4 under Existing Regional BMPs subsection Analysis Region SMB-6-01 to include the project completion dates for Annie, Henrietta, and Entradero Detention Basin Enhancement projects.
Section 7	Part VI.C.1.g.ix (page 50)	<p>Section 7 of the draft EWMP inadequately addresses the Group’s financial strategy. Include the following in Section 7 of the revised EWMP:</p> <ul style="list-style-type: none"> • Amount and source of current monetary funds to install and implement the BMPs proposed for the milestones in the current permit cycle for each Permittee. • Selection and a prioritization process for obtaining funding that includes the selection of financing strategies that best fit the Groups’ needs (e.g., step 1: apply for X grants, step 2: apply for loans, etc.). • A timeline to search for funding with consideration of the milestones indicated in the EWMP. • Articulation of who is responsible for seeking funding (e.g., the lead permittee, all the group members). If most or all Group members will be seeking funding, specify the

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>responsibilities of those members. It should also outline steps toward, for example:</p> <ul style="list-style-type: none"> • development of a stormwater Capital Improvement Plan and/or asset management plan, • integration of proposed EWMP projects with other street/sewer/water CIPs and asset management plans (e.g., Pavement Management Systems, etc.) • establishing a constant revenue stream for the stormwater CIP/asset management plan, which may include rate studies.
Reasonable Assurance Analysis (RAA)		
Executive Summary	Part VI.C.5.b.iv.(5) (page 65)	<p>The draft EWMP, in the Executive Summary under Santa Monica Bay Watershed, states the following: <i>“The MS4 compliance targets for dichloro-diphenyl-trichloroethanes (DDTs) and polychlorinated biphenyls (PCBs) established in the Santa Monica Bay DDT & PCB TMDL were based on the assumption that the existing stormwater pollutant loads for DDT and PCBs were lower than what was needed to protect the Santa Monica Bay from these legacy pollutants (i.e., based on data used in the TMDL, no MS4 pollutant load reduction is expected to be required). Therefore, no reductions in DDT and PCB loading from the Beach Cities WMG MS4s are required to meet the TMDL and therefore, no Reasonable Assurance Analysis is required.”</i></p> <p>The SMB DDTs/PCBs TMDL on page 49 states the following: <i>“The estimates of total suspended solids (TSS) are based on LSPC model outputs for the years 2000 to 2010 based on Ackerman and Schiff (2003). Using this method the theoretical maximum allowable stormwater loads would be 506 g/yr for DDT and 154 g/yr for PCBs (Table 6-3). However, estimates of current stormwater loads are much lower. Estimates based on the median value from Curren et al. (2011) extrapolated to the other watersheds based on percent urban area were 28 g/yr for DDT and 145 g/yr for PCBs. The highest loadings were from Ballona Creek, Hermosa Beach and Santa Monica Canyon watersheds. These three watersheds are highly urbanized and combined they represent 94% of the developed area draining to Santa Monica Bay. With the exception of PCBs from these three watersheds, all other estimates of current loading are lower than the allowable loadings.”</i></p> <p>Therefore, the assumption that DDT requires no reduction is reasonable. However, for PCBs, an RAA must be conducted to estimate the pollutant load reduction for PCBs. Using TSS as a surrogate pollutant for PCBs is an acceptable approach for the purposes of conducting an RAA. Note that the WLA for PCBs</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>(140.25 g/yr) applies to the entire Santa Monica Bay Watershed. The Group is subject to a percentage of the WLA relative to the percent area within the watersheds draining to Santa Monica Bay. If a pollutant load reduction is required for PCBs, additional BMPs should be proposed to address it. Please revise relevant tables and text as applicable.</p> <p>Alternatively, the EWMP must provide a rationale why the aforementioned requirements cannot be fulfilled (i.e., insufficient data, RAA limitations for modeling PCBs, etc.). The Group must also, during the adaptive management process, commit to re-evaluating DDT and PCB loadings using data from the CIMP (from receiving water and/or outfall monitoring sites) and subsequently conducting an RAA with the available data.</p>
Section 2.4	Part VI.C.5.b.iv.(5) (page 65)	<p>As stated in the Executive Summary and Section 2.2.2 of the draft EWMP, include a qualitative discussion on how the Group will comply with the Santa Monica Bay Nearshore and Offshore Debris TMDL (SMB Debris TMDL) in Section 2.4 of the EWMP and include references to the Trash Monitoring and Reporting Plans (TMRPs) and the Plastic Pellet Monitoring and Reporting Plans (PMRPs). Note that the TMRP and PMRPs will be implemented by reference as part of the EWMP and CIMP.</p>
Section 4.1.2	Part VI.C.5.b.iv.(5). (c) (page 65)	<p>The Harbor Toxics TMDL final compliance date for wet weather is March 23, 2032. However, Table ES-11 and Table 4-2 of the draft EWMP propose December 2032 for addressing wet weather bacteria in Dominguez Channel with footnote 1 and 2 respectively indicating that this date was selected to be consistent with the Harbor Toxics TMDL. Provide justification in Section 4.1.2 of the draft EWMP why the proposed milestone for Dominguez Channel bacteria in wet weather is 6 months after the final compliance date of the Harbor Toxics TMDL. Alternatively, change the milestone for Dominguez Channel wet weather bacteria to March 23, 2032 for consistency with the Harbors Toxics TMDL compliance dates.</p>

Los Angeles Regional Water Quality Control Board

Enclosure 2 – Summary of Comments and Necessary Revisions for the Reasonable Assurance Analysis (RAA)

Beach Cities Watershed Management Area Enhanced Watershed Management Program (EWMP)

Prepared by: C.P. Lai, Ph.D., P.E.

This memorandum contains the comments on Sections 2.4 - 2.7 and 3.4 - 3.7, Reasonable Assurance Analysis (RAA) of the Enhanced Watershed Management Program (EWMP) for the Beach Cities Watershed Management Area dated June 2015.

1. Provide a graph of the time series results, between 2001 and 2012, of modeled runoff volumes with observed runoff volumes and a statistical analysis of the comparison of modeled and observed values for runoff volume.
2. The model results of the baseline condition (loads are included in Table ES-4 and Table 2-6 for Santa Monica Bay Watershed; Table ES-9, Table 3-8 and Table 3-9 for Dominguez Channel Watershed) in terms of runoff volume and pollutant concentration are not provided in the EWMP report. Per the RAA Guidelines, present the model results of the baseline condition for runoff volume, pollutant concentration and pollutant loadings based on the 90th percentile critical condition at each analysis region for each pollutant of concern.
3. Per the RAA Guidelines, the model results for the proposed control measures and potential BMPs should be provided to demonstrate the effectiveness of the proposed BMPs that would achieve the required pollutant load reductions and load reduction goals. However, as presented, the model results in Table 3-12 for Dominguez Channel Watershed of the EWMP report do not sufficiently demonstrate the effectiveness of the proposed BMPs. As such, the detailed reasonable assurance analysis (RAA) results for the proposed BMPs for each analysis region should be provided in terms of 1) influent volume, concentration and load; 2) treated volume, concentration and load; and 3) effluent volume, concentration and load through BMPs for the selected critical year in the EWMP report to demonstrate the effectiveness of the proposed BMPs.
4. An example illustrating the modeling results of pollutant concentrations in the receiving water for all pollutant of concern at the downstream outlet of the watershed system should be presented in the EWMP report to demonstrate the effectiveness of all BMPs in place when compared with those of the baseline condition for which all BMPs are not in place and to demonstrate the compliance with final water quality limits (WQL) under the selected critical year.

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