

**Los Angeles Water Board Response to Specific Written Comments by County Sanitation Districts of Los Angeles County, dated August 28, 2015, on the Draft Palos Verdes Peninsula (PVP) EWMP**

Comment No.	County Sanitation Districts of Los Angeles County Comment	Los Angeles Water Board Response
1	<p><b><u>Joint Water Pollution Control Plant (JWPCP)</u></b>            As part of the water quality priority analysis, the PV Group EWMP completed a source assessment for the watershed management area. The source assessment identifies and describes various National Pollutant Discharge Elimination System (NPDES) sources and non-point sources. The Sanitation Districts' JWPCP is included in the NPDES sources discussion and is described as "...the Los Angeles County Joint Water Pollution Control Plant and discharges into the Santa Monica Bay." (page 2-33). The JWPCP discharges to the Palos Verdes Shelf; however, not the Santa Monica Bay as stated in the PV Group EWMP. As such, we request that the PV Group EWMP is amended to state " ... the Los Angeles County Joint Water Pollution Control Plant and discharges to the coastal waters of the Palos Verdes Shelf" to accurately describe the discharge location.</p>	<p>Comment considered. The draft PVP EWMP has been revised to include the suggested language.</p>
2	<p><b><u>Palos Verdes Landfill</u></b>            The PV Group EWMP includes a section explaining the selection of water quality control measures, one of which is structural regional best management practices (BMPs). The PV Group EWMP identifies existing, planned, and proposed regional BMPs within the watershed management area. More specifically, the Machado Lake Watershed area includes a proposal to place treatment BMPs on or adjacent to the closed PVLf Main Site. We appreciate that the PV Group recognizes significant</p>	<p>Comment considered. During development of the PVP EWMP, the PVP Watershed Management Group conducted two workshops to encourage stakeholder participation and solicit input. Section 3.2.4.2.4 of the Draft EWMP identifies key stakeholders who were invited to participate, which included the LA County Sanitation Districts. In addition, the County of Los Angeles is one of the Permittees of the PVP Watershed Management Group.</p> <p>In addition, Section 1.5.6 of the draft EWMP states:  <i>...stormwater structural controls that may be</i></p>

Comment No.	County Sanitation Districts of Los Angeles County Comment	Los Angeles Water Board Response
	<p>work is needed to investigate the feasibility of this proposal. If a BMP is considered on the PVLf Main Site, either a storage-and-treatment facility or a subsurface flow lined-wetland, implementation of the BMP will need to overcome significant land use and technical challenges. The Sanitation Districts are currently responsible for the operation and maintenance of the environmental control systems at PVLf Main Site under a Joint Powers Agreement with the County of Los Angeles. Additionally, the County of Los Angeles is ultimately responsible for the recreational development and use of the PVLf Main Site. As such, any project encompassing jurisdictional land use changes will require involvement and approval from the County of Los Angeles. Moreover, if implementation of the regional BMP results in interruption of the environmental control system or disturbance of the final landfill cover at the PVLf Main Site, all related geotechnical and environmental issues will require review and approval from the Department of Toxic Substances Control (DTSC) that provides regulatory oversight of the closed Palos Verdes Landfill. For the aforementioned reasons, the Sanitation Districts recommend that the PV Group coordinate with our agency as well as Los Angeles County, DTSC, and other pertinent agencies if the feasibility of PVLf Main Site Regional BMP is going to be further evaluated.</p>	<p><i>implemented as a result the EWMP may require discretionary approval subject to review under the California Environmental Quality Act (CEQA). The participating agencies intend to comply with CEQA when implementing structural BMPs...At a minimum, the lead agency must adhere to the consultation and public notice requirements set forth in the CEQA Guidelines, make determinations whether the proposed stormwater structural control is a "project", and if so, conduct an initial review of the project and its environmental effects. The lead agency must identify and document the potential environmental impacts of the proposed project in accordance with CEQA, (Public Resources Code Section 21000 et seq.), and the CEQA Guidelines (Title 14 of the California Code of Regulations, Section 15000, et seq.).</i></p> <p>The Los Angeles Water Board will continue to encourage the PVP Watershed Management Group to coordinate, as needed, with the commenter and other agencies as it implements its EWMP.</p>