

Los Angeles Regional Water Quality Control Board

February 5, 2016

Permittees of the Dominguez Channel Watershed Management Area Group¹
(See Distribution List)

REVIEW OF ADDENDA TO THE DRAFT ENHANCED WATERSHED MANAGEMENT PROGRAM FOR THE DOMINGUEZ CHANNEL WATERSHED MANAGEMENT AREA GROUP, 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 Dominguez Channel Watershed Management Area Group:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the Addenda to the draft Enhanced Watershed Management Program (EWMP) for the Dominguez Channel Watershed Management Area Group (Group) submitted by the City of Lawndale on December 11, 2015; and by the City of Carson on December 16, 2015.

These Addenda were submitted to the Los Angeles Water Board so that the City of Lawndale and the City of Carson can be incorporated into the Group's EWMP. Both of these cities joined the Dominguez Channel Watershed Management Area Group following the submittal and review of the Group's draft EWMP. To give the Group time to consolidate EWMP revisions based on comments from the public and the Los Angeles Water Board on the submitted EWMP Addenda, the Group was given an extension to February 29, 2016 to submit its revised EWMP.

The Los Angeles Water Board provided public notice and a 34-day period to allow for public review and comment on the two Addenda to the Group's draft EWMP. No comments were received during the public review and comment period.

The Los Angeles Water Board has reviewed the Addenda to the draft EWMP and has determined that, for the most part, the draft EWMP with the incorporated Addenda includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, additional revisions to the Group's draft EWMP are necessary. The Los Angeles Water Board's comments on the Addenda are found in Enclosures 1 and 2. Please make the necessary revisions to the information contained in the Addenda as identified in the enclosures to this letter, in addition to the necessary revisions previously identified in the Los Angeles Water Board's October 23, 2015 letter on the Group's draft EWMP, and submit the revised EWMP as soon as possible and no later than **February 29, 2016**.

¹ Permittees of the Dominguez Channel Watershed Management Area Group EWMP 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.

The revised EWMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Dominguez Channel EWMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Chris.Lopez@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 Attachment L 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 WQBELs and receiving water limitations pursuant to Part VI.E and set forth in Attachments L through R by the applicable compliance deadlines occurring prior to approval of an EWMP.

If you have any questions, please contact Mr. Chris Lopez of the Storm Water Permitting Unit by electronic mail at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. 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: City of Carson Addendum
Enclosure 2 – Comments and Necessary Revisions: City of Lawndale Addendum
Dominguez Channel WMA Group Distribution List

**Enclosure 1 – Summary of Comments and Necessary Revisions to Draft EWMP
based on the City of Carson Addendum**

Dominguez Channel Watershed Management Area Group

EWMP Addendum Reference	MS4 Permit Provision	Comment and Necessary Revision
(1) Section 2	Part VI.C.5	<p><u>Water Quality Priorities within Los Angeles River Watershed</u> In its discussion of water quality priorities, Section 2 (pg. 4) references the analysis of the Dominguez Channel Watershed Management Area included in the Dominguez Channel EWMP and states that “[t]he inclusion of Carson does not necessitate any additional Water Quality Priorities (TMDLs, 303(d) listings, or otherwise).”</p> <p>However, this discussion does not address the portion of the City of Carson within the Los Angeles River watershed. The revised EWMP’s section on water quality priorities (including the subsections on water quality characterization, water body-pollutant classification, source assessment, and prioritization) must address this portion of the City of Carson.</p>
(2) Section 2	Part VI.C.5.a.iii	<p><u>Source Assessment</u> The revised EWMP’s source assessment must consider additional pertinent information (if any) now available with the inclusion of the City of Carson—e.g. findings from the City’s Illicit Connections and Illicit Discharge Elimination Program and other MS4 permit programs; findings from the City’s Machado Lake Nutrient TMDL Source Identification Study and other similar TMDL studies; locations of the City’s MS4s, major outfalls, and major structural controls; etc.</p> <p>A list of information to be considered in the source assessment is outlined in Section VI.C.5.a.iii of the LA County MS4 Permit.</p>
(3) Section 3.1.1	Part VI.C.5.b	<p><u>Information on Regional Projects</u> Section 3.1.1 (pg. 6) identifies two regional projects to address runoff from the City of Carson. The Group must include additional information on these identified projects:</p> <ul style="list-style-type: none"> • Provide milestones and timelines for each project; • Include the rainfall depth (in inches), rainfall volume, and storm water runoff volume associated with each project; • In as much detail as possible, further articulate what the

EWMP Addendum Reference	MS4 Permit Provision	Comment and Necessary Revision
		anticipated multi-benefits are for each project; <ul style="list-style-type: none"> Clarify which projects can be designed to retain the 85th percentile, 24-hour storm event.
(4) Section 3.1.3 and Table 5-5	Part VI.C.5.b	<p><u>Additional Regional Projects / Regional Projects on Private Parcels</u> The EWMP Implementation Plan included in Table 5-5 (pg. 34) indicates that 100.3 acre-feet of BMP capacity should be implemented through “Additional Regional BMPs.” This is roughly half of the 202.9 acre-feet of BMP capacity called for in the EWMP Implementation Plan.</p> <p>The Group needs to elaborate on the feasibility of its strategy and detail its process for implementing these BMPs. In particular, the Group must clarify if it already has a list of potential regional project sites identified from the regional project screening process explained in Section 3.1 (pg. 5) or if there is a lack of publicly-owned land for these projects.</p> <p>The Group must also explicitly state any difficulties or issues that may be faced with this strategy and should identify potential alternative approaches that it can pursue.</p>
(5) Section 3	Part VI.C.5.b.iv.(3)	<p><u>Los Angeles River TMDLs / Machado Lake Trash TMDL</u> Indicate whether a Load Reduction Strategy will be pursued by the City of Carson for the Los Angeles River Bacteria TMDL.</p> <p>Furthermore, include the Group’s strategy to implement pollutant controls necessary to achieve water quality-based effluent limitations for the Los Angeles River and Machado Lake Trash TMDLs.</p>
(6) Section 4	Part VI.C.5.b.iv.(5)	<p><u>Reasonable Assurance Analysis</u> Provide the model files for the RAA analysis for the City of Carson.</p> <p>Additionally, for clarity, provide further detail in Section 4 on the Upper Los Angeles River EWMP Group’s limiting pollutant analysis and its applicability to the City of Carson.</p>
(8) Section 7	Part VI.C.1.g.ix	<p><u>Financial Strategy</u> In the revised EWMP, include information on the existing stormwater costs for the City of Carson. This information was previously provided for the Group’s other member agencies in Table 7-13 of the draft EWMP.</p>

EWMP Addendum Reference	MS4 Permit Provision	Comment and Necessary Revision
(9) None	Part VI.C.5.b.iv.(6)	<u>Legal Authority</u> In the revised EWMP, include a certified statement that the City of Carson has the necessary legal authority to implement the Watershed Control Measures identified in the EWMP and EWMP Addendum, or that other legal authority exists to compel implementation of the Watershed Control Measures.

**Enclosure 2 – Summary of Comments and Necessary Revisions to Draft EWMP
based on the City of Lawndale Addendum**

Dominguez Channel Watershed Management Area Group

EWMP Addendum Reference	MS4 Permit Provision	Comment and Necessary Revision
(1) Section 2	Part VI.C.5.a.iii	<p><u>Source Assessment</u></p> <p>The revised EWMP's source assessment must consider additional pertinent information (if any) now available with the inclusion of the City of Lawndale—e.g. findings from the City's Illicit Connections and Illicit Discharge Elimination Program and other MS4 permit programs; findings from any source investigations; locations of the City's MS4s, major outfalls, and major structural controls; etc.</p> <p>A list of information to be considered in the source assessment is outlined in Section VI.C.5.a.iii of the LA County MS4 Permit.</p>
(2) Section 3.1.1	Part VI.C.5.b	<p><u>Information on Regional Projects</u></p> <p>Section 3.1.1 identifies three regional projects to address runoff from the City of Lawndale. The Group must include additional information on these listed projects:</p> <ul style="list-style-type: none"> • Provide milestones and timelines for each project; • Include the rainfall depth (in inches), rainfall volume, and storm water runoff volume associated with each project; • In as much detail as possible, further articulate what the anticipated multi-benefits are for each project; • Clarify if these projects can be designed to retain the 85th percentile, 24-hour storm event.
(3) Section 4	Part VI.C.5.b.iv.(5)	<p><u>Reasonable Assurance Analysis</u></p> <p>Provide the model files for the RAA analysis for the City of Lawndale.</p>
(4) Table 4-2	Part VI.C.5.b.iv.(5)	<p><u>RAA – Load Reduction</u></p> <p>Section 4.3 and Table 4-2 note that an 86% zinc load reduction is required. However, calculating the required load reduction using values provided in Table 4-2 appears to give an 88% load reduction:</p> $1 - \frac{\text{Allowable load during 90th percentile}}{\text{Loading during 90th percentile}}$

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		$= 1 - \frac{76.0 \text{ lbs}}{625.7 \text{ lbs}} \approx 87.9\%$ <p>Clarify these load reduction numbers and any related sections of the EWMP.</p>
(5) Section 7	Part VI.C.1.g.ix	<p><u>Financial Strategy</u> In the revised EWMP, include information on the existing stormwater costs for the City of Lawndale. This information was previously provided for the Group's other member agencies in Table 7-13 of the draft EWMP.</p>
(5) None	Part VI.C.5.b.iv.(6)	<p><u>Legal Authority</u> In the revised EWMP, include a certified statement that the City of Lawndale has the necessary legal authority to implement the Watershed Control Measures identified in the EWMP and EWMP Addendum, or that other legal authority exists to compel implementation of the Watershed Control Measures.</p>