
Los Angeles Regional Water Quality Control Board

October 27, 2015

Permittees of the Marina del Rey Watershed Management Group¹

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REVIEW OF THE MARINA DEL REY 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 Marina del Rey 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 29, 2015 by the Marina del Rey 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.

¹ Permittees of the Marina del Rey Watershed Management Group include the County of Los Angeles, the cities of Los Angeles and Culver City, and the Los Angeles County Flood Control District.

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.

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 29, 2015, the Group submitted a draft Enhanced Watershed Management Program (EWMP) 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 three letters that contained comments specific to the Group's draft EWMP. These letters were from the Natural Resources Defense Council, Los Angeles Waterkeeper, and Heal the Bay; the Construction Industry Coalition on Water Quality; and a private citizen, Joyce Dillard. 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.

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 27, 2016**.

The revised EWMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Marina del Rey EWMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Rebecca.Christmann@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 trash WQBELs and all other 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 Ms. Rebecca Christmann of the Storm Water Permitting Unit by electronic mail at Rebecca.Christmann@waterboards.ca.gov or by phone at (213) 576-5734. 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: Marina del Rey Watershed Management Group Distribution List
Enclosure 1 – Comments and Necessary Revisions to Draft EWMP
Enclosure 2 – Comments on the Reasonable Assurance Analysis

cc: Angela George, County of Los Angeles, Department of Public Works
Paul Alva, County of Los Angeles, Department of Public Works
Bruce Hamamoto, County of Los Angeles, Department of Public Works
Hubertus Cox, City of Los Angeles
Damian Skinner, City of Culver City

Los Angeles Regional Water Quality Control Board

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

Marina del Rey Watershed Management Group

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
General		
Table 5-11, Section 5.5	<i>Part VI.C.5.b.iv.(4)(b)-(c), page 64</i>	While a 5-10% load reduction is generally agreed upon for non-structural BMPs in an EWMP, provide the basis for the contaminant reductions anticipated from non-structural BMPs identified in Table 5-11, if available, and supporting citations, which may include analysis contained in the Multi-Pollutant TMDL Implementation Plan.
Section ES.5	<i>Part VI.C.5.b.iv.(4)(d), page 64</i>	There is conflicting information within the EWMP regarding the proposed implementation schedule. The EWMP compliance strategy schedule in Figure ES-5 (Section ES.5, pg. ES-10) appears in conflict with the RAA Load Reduction Schedule in Figure ES-4 and Table 7-3. The schedule in Figure ES-5 backloads the majority of BMP implementation rather than applying a phased approach and does not enable the meeting of the interim deadlines in the toxics TMDLs. This approach does not allow adequate time for adaptive management prior to the final TMDL compliance deadline. This schedule does not appear to meet the TMDL requirements and must be revised.
Section 5.2.4.2.5 and Sections 7.2-7.3		The draft EWMP makes reference of additional projects but does not provide details regarding their cost or readiness for implementation. Further contingency planning, including additional milestones for gauging the necessity for additional BMPs, and improving the readiness to proceed with additional BMPs, must be included in the EWMP. These additional milestones may be included in an expanded Section 9, Assessment and Adaptive Management Framework.
Section 5.2.3.2	<i>Part VI.C.5.b.iv.(4)(e), page 65</i>	It appears that the Venice Neighborhood Project may overlay with SR 187, an area with Caltrans jurisdiction. Elaboration is needed regarding the potential role, if any, of Caltrans in this project and, if necessary, a statement regarding whether Caltrans has agreed to permit the project.
Section 3.2	<i>Part VI.C.5.c, page 66]</i>	Implementation planning for meeting both the toxics and bacteria TMDLs are based on zinc being the limiting pollutant and assuming that all other pollutant reductions will be attained by BMPs that will address zinc in the watershed. A clear presentation and discussion of the data-driven analysis used to support this conclusion must be included in the draft EWMP to provide assurance that all TMDL deadlines will be achieved for the indicator bacteria and toxics TMDLs. While a demonstration for bacteria is provided in Appendix C, section 7, a discussion of the bacteria analysis as well as the analysis for other toxic pollutants must be provided in Section 6 of the main body of the EWMP and must reference the appendix or include the supporting data analysis for the other pollutants addressed by the EWMP.

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>As the Marina del Rey watershed is included in the Ballona Creek Trash TMDL (see January 16, 2004 TMDL Staff Report, section III.A and Figure B), provide a discussion of the status of compliance with the trash WQBELs per the Ballona Creek Trash TMDL for the Marina del Rey watershed area, including subwatershed 2 (Ballona Lagoon and Venice Canals). Additionally, update Table 3-2 and other tables in the EWMP as appropriate to include the Ballona Creek Trash TMDL and the corresponding compliance schedule.</p> <p>The Santa Monica Bay TMDLs for DDTs and PCBs include WLAs for all MS4 discharges to Santa Monica Bay, including those from the Marina del Rey watershed. Therefore, the EWMP must address the SMB TMDLs for DDTs and PCBs. For subwatershed areas that are addressed by the Marina del Rey Toxics TMDL, provide a comparative analysis of the DDTs and PCBs WLAs assigned to MS4 discharges in each TMDL (including the numeric targets that form the basis for the WLAs) to demonstrate that implementation of the MDR Toxics TMDL requirements will achieve the requirements of the SMB DDTs and PCBs TMDLs. However, subwatershed areas not addressed by the MDR Toxics TMDL – namely, subwatershed 2 which is the drainage area to the Venice Canals/Ballona Lagoon – must also be addressed relative to the requirements of the SMB TMDLs for DDTs and PCBs. Make the necessary modifications to the EWMP, including the addition of the SMB TMDLs for DDTs and PCBs to the appropriate sections and tables regarding 303(d) listings and applicable TMDLs for the MDR watershed (e.g., Section 3.2, Table 3-1, etc.).</p>
Appendix F, pg 75	[Part VI.C.1.f.v, page 49]	The EWMP Work Plan, provided as appendix F to the EWMP, states that a stakeholder workshop/meeting was held on April 10, 2014 and that two other meetings were anticipated to occur prior to EWMP submittal. Provide current details in the EWMP itself regarding the stakeholder input in developing the EWMP.
Water Quality Characterization		
Section 4.1, 4.2, and Table 4-2,	Part VI.C.5.a.i	<p>Where possible, distinguish stormwater and non-stormwater discharges in the water quality characterization. Document whether permittees evaluated all pollutants included in the relevant studies and program monitoring efforts, or only a subset of pollutants of concern.</p> <p>The figures in Table 3-4 require clarification. Per Regional Board Time Schedule Order No. R4-2014-0142, MdrRH-1 shall not exceed interim WQBELs in excess of allowable exceedance days through <i>daily</i> sampling while the other monitoring stations shall not exceed interim WQBELs through <i>weekly</i> sampling. This distinction must be noted in the table to avoid confusion or the values shall be adjusted for consistency based on weekly or daily only.</p> <p>The draft EWMP does not include a discussion of debris or trash. These pollutants must be addressed as Category 1 pollutants throughout the EWMP, as the Marina del Rey Watershed is subject to Trash and Debris TMDLs (see previous comment). Make modifications throughout EWMP as necessary (e.g., Tables ES-1, 3-1, 3-2, 4-2).</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
Water Body Pollutant Classification		
Section 4.3 and Table 7-1	Part VI.C.5.a.ii.(1)	<p>Pollutants included in the Marina del Rey Harbor toxic pollutants TMDL are listed as Category 1 pollutants (Section 4.3.1, Table 4-2, p.22). The 303(d) list includes sediment toxicity and fish consumption advisory as impairments in Marina del Rey Harbor. Both are addressed in the toxics TMDL and must also be listed as Category 1 pollutants in the draft EWMP.</p> <p>The MdrH and Ballona Lagoon/Venice Canals are waterbodies within Santa Monica Bay WMA and the permittees within that subwatershed area shall comply with interim and final WQBELs for trash in the Ballona Creek Trash TMDL and Santa Monica Bay Debris TMDL. As such, trash and debris must also be included within the table for Category 1 pollutants in MdrH and Ballona Lagoon/Venice Canals.</p> <p>The U.S. EPA Santa Monica Bay TMDLs for PCBs and DDTs assigned WLAs to the Los Angeles County MS4 for DDT and PCBs. DDT and PCBs must be included as Category 1 WBPCs in the draft EWMP for all subwatersheds within the MDR watershed, including subwatershed 2, and addressed throughout the draft EWMP (see previous comment).</p> <p>Most of the draft EWMP pertinent to the Marina del Rey Harbor Toxic Pollutants TMDL is based on the 2014 revision, which became effective on October 16, 2015, after the draft EWMP was submitted. The numeric target for PCBs in fish tissue included in the draft EWMP is from the original Marina del Rey Harbor Toxic Pollutants TMDL and was effective prior to October 16, 2015. The loading capacity and waste load allocations for PCBs in sediment are included from the revised TMDL. Utilizing the numeric target from original TMDL is acceptable as it is the current basis for the WQBEL; however, draft EWMP planning should also consider that the revised TMDL is effective and the new numeric target shall be incorporated into future MS4 permits.</p> <p>Table 7-1 (Section 7.0, p.75) lists required load reductions by sub-watershed necessary to comply with the toxics TMDL. This table will need to be verified and possibly updated once comments regarding the RAA are addressed.</p>
Section ES.2 and 4.1	Part VI.C.5.a.ii(2) and (3)	<p>It is unclear whether all WBPCs were assessed based on the readily available data described. Section 4.2 and Appendix F emphasize Category 1 pollutants, but do not discuss other WBPCs. Bight data, previous MS4 monitoring, annual monitoring by ABC Laboratories, as well as any other watershed monitoring should be considered to determine if other WBPCs need to be included in the EWMP. A discussion of this data review must be added to the EWMP.</p> <p>Also, the draft EWMP does not describe beach bacteria monitoring results or any relevant trash data.</p>
Source Assessment		

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
Section ES.2, 5.0 to 5.3	Part VI.C.5.a.iii.(1)(a)(i)-(iv)	<p>The draft EWMP does not include findings based on the Permittee(s)' IC/IDE programs, Industrial/Commercial Facilities Pollutant Control programs, Development Construction programs, Public Agency Activities programs regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters and any other stressors related to MS4 discharges causing or contributing to the water quality priorities. The EWMP must state whether these findings were considered and if they were not considered, provide justification as to why they were not.</p>
Section 4.4	Part VI.C.5.a.iii.(1)(a)(v)	<p>A source assessment was carried out and is described. The discussion presented is qualitative and seems generally consistent with TMDL findings; however, sources are not cited for where much of the information was obtained. Citations supporting the source assessment discussion must be added to the draft EWMP.</p> <p>There is insufficient evidence to rule out Oxford Basin as a source of metals to Marina del Rey Harbor. Regardless, the Oxford Basin Multi-Use Enhancement Project is anticipated to mitigate pollutants entering Marina del Rey Harbor from Oxford Basin and post-project monitoring required through the CIMP should enable evaluation of pollutant loading from Oxford Basin to Marina del Rey Harbor and BMP performance.</p> <p>The draft EWMP does not mention or summarize the findings from the MdR Vessel Discharge Report, the Small Drain Study, or describe any source investigations for trash.</p>
Figure 5-1	Part VI.C.5.a.iii.(1)(b)	<p>The draft EWMP does not include a map of the permittees' MS4, storm drain lines or major outfalls, but includes maps of some existing control structures. The revised EWMP must provide a complete map within the body of the document or submit GIS files containing the Permittees' storm drain lines and major outfalls, along with existing control structures, as part of the revised EWMP submittal.</p>
Prioritization		
Executive Summary, Figures ES-4 and ES-5; Section 7.2 Tables 7-2 and 7-3	Part VI.C.5.b.ii.(1), page 62	<p>The draft EWMP does not clearly state whether planned implementation will prevent or eliminate non-stormwater discharges to the MS4 that are a source of pollutants from the MS4 to receiving waters.</p> <p>The executive summary of the draft EWMP contains two conflicting graphs regarding implementation timing. Figure ES-4 (pg. ES-9) shows the RAA load reduction schedule. Figure ES-5 (pg. ES-10) shows the draft EWMP compliance strategy schedule. BMP implementation in the draft EWMP compliance strategy schedule is delayed relative to the RAA load reduction schedule. The draft EWMP compliance strategy schedule indicates that the final compliance date may be met for the toxics TMDL but that interim compliance deadlines will not be met. These graphs from the executive summary are not presented elsewhere in the draft EWMP. Explanation is necessary regarding what information was used as the basis for these graphs and clarification is required as to whether or not the timeline proposed is intended to meet all TMDL compliance deadlines. (See previous comment.)</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>Tables 7-2 (pg. 77) and 7-3 (pg. 78) contain information on the RAA reduction schedule. It is unclear from the discussion in the executive summary if the RAA schedule is the intended implementation schedule. Clarify.</p> <p>Also, clarify the figures and calculations in Tables 7-2 and 7-3, it appears that figures for individual subwatersheds (1A, 3, 4) should sum up to totals shown for Back Basins, but they do not appear to add up correctly.</p>
Selection of Watershed Control Measures		
<p>Section 3.2.1 page 11 and Appendix F section 2.2.1 page 9.</p>	<p><i>Part VI.C.5.a.iv.(1), page 61</i></p>	<p>The draft EWMP references that "trash WLA applicable to the MS4 Permittees shall be complied with through the Ballona Creek Trash TMDL ..." To the extent that final compliance with the trash WQBELs has not been achieved to date (with a final compliance deadline of 9/30/15), the draft EWMP must describe the proposed method of compliance and corresponding implementation strategies and milestones for the Trash TMDLs. The revised EWMP must clarify that the Mdr Watershed Permittees are implementing trash controls as required by the Ballona Creek Trash TMDL and corresponding Compliance Schedule in the LA County MS4 Permit.</p>
<p>Section 6.0</p>	<p><i>Part VI.C.5.b.iv.(1)(a) (i-v), page 63</i></p>	<p>The draft EWMP states that: "Participating agencies are continuing to implement the MCMs required under the 2001 MS4 Permit. Applicable new MCMs will be implemented by the time the draft EWMP is approved by the Regional Board."</p> <p>Provide details in the draft EWMP regarding whether default provisions or further enhancements from the 2012 MS4 permit are being utilized. The draft EWMP must specify the particular control measures/MCMs/non-stormwater discharge control measures that will be used in the watershed beyond, or different than, those specified in the 2012 MS4 permit.</p>
<p>Section 7.3</p>	<p><i>Part VI.C.5.b.iv.(1)(c), page 63</i></p>	<p>The draft EWMP states, "All MCMs that are required by the 2012 Permit will be implemented." The statement is vague and the draft EWMP does not further describe which Minimum Control Measures (MCMs) will be addressed nor how they will be addressed. Clarification is required in the EWMP to determine if any MCMs will be eliminated or modified by any Permittee(s).</p>
<p>Section 6.3</p>	<p><i>Part VI.C.5.b.iv.(4)(a), page 64</i></p>	<p>Control measures potentially necessary to comply with the Santa Monica Bay TMDLs for DDT and PCB are not discussed in the draft EWMP. An evaluation of these TMDLs must be included in the draft EWMP. Dependent on the results of this evaluation, additional control measures may be necessary for subwatershed 2.</p>
Enhanced Watershed Management Program Provisions		
<p>Section ES.2, 5.2, 5.5, and Appendix F section 9.2.8</p>	<p>Part VI.C.1.g,</p>	<p>Schools were excluded as potential BMP sites due to concern over public acceptance; however, it is unclear whether this was vetted with the community. Provide supporting details to support this claim.</p> <p>The role of the public and environmental groups in evaluating opportunities with the Watershed Management Area must be clearly</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>discussed in the final draft EWMP.</p> <p>Based on the information provided in the draft EWMP and Appendix C, it cannot be determined whether all the multi-benefit regional projects will retain the storm water runoff from the 85th percentile, 24-hour storm event from drainage areas tributary to the project. Clarify which of the multi-benefit regional projects will retain the stormwater runoff from the 85th percentile, 24-hour event from the drainage area tributary to the project. Clarify whether these regional projects will also retain all non-stormwater runoff from the drainage area tributary to the project. Also, provide a description of the multiple benefits anticipated from each project for each of the two regional priority projects, the green streets, and each of the four parks.</p> <p>Effectiveness demonstrations in the draft EWMP focus on TMDL compliance rather than capture of the volume of the 85%, 24-hour storm. Details must be added regarding the potential of each anticipated BMP to meet the 85%, 24-hour storm. (See previous comment.)</p> <p>Also, provide an overarching discussion of where it is, and is not feasible, within the watershed to capture or infiltrate the stormwater volume associated with the 85%, 24-hour storm.</p> <p>See also Enclosure 2 RAA Modeling comments.</p>
<p>Section 5.2.2 and Table 17 in Appendix F, pg. 39</p>	<p>Part VI.C.1.g, iv</p>	<p>The draft EWMP states:</p> <p style="padding-left: 40px;">Benefits may include community enhancement through beautification, property value increase, improved beach tourism, ecosystem protection, and groundwater recharge.</p> <p>Groundwater recharge capacity of BMPs is incorporated in modeling. Clarify how much groundwater recharge is expected to result from implementation of BMPs in the Marina del Rey Watershed.</p>
	<p>Part VI.C. 1.g.ii</p>	<p>Indicate whether State agency input on priority setting and other key implementation was considered in the draft EWMP.</p>
<p>Section 8.0 – 8.4</p>	<p>Part VI.C. 1.g.vi</p>	<p>The draft EWMP describes costs per each structural and non-structural BMP but does not analyze project alternatives or BMP selection and sequencing to maximize effectiveness or cost savings (e.g., timing green streets implementation to coincide with regular street replacement). Also the draft EWMP has described “potential” funding options through grants, fees, and legislative strategies but provides no analysis on planning, timing, resources allocated, expected funding, or strategies for obtaining estimated amount of monies described in table 8-4 to 8-10 to implement, operate, or maintain the described BMPs and programs. Include the following in 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 (including breakdown of funds provided by Costco and funds already secured for the Oxford

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>Basin Multi-Use Enhancement Project).</p> <ul style="list-style-type: none"> • 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 responsibilities of those members. <p>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.
Section 5.1.1	<i>Part VI.C.1.g.viii</i>	<p>Provide additional discussion of control of non-stormwater discharges, including but not limited to existing BMPs (e.g., LFDs, Lot 5 and 7 project, and Oxford Basin) and MCMs. The revised EWMP should be revised to specify how non-storm water discharges will be addressed, e.g., "implementation of Regional BMPs and Green Streets will address non-storm water as well as storm water runoff to comply with WLAs and RWLs."</p>

Los Angeles Regional Water Quality Control Board

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

Marina del Rey

Enhanced Watershed Management Program (EWMP)

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

This memorandum contains the comments on Section 6, Reasonable Assurance Analysis (RAA) and Appendix C of the draft Enhanced Watershed Management Program (EWMP) for the Marina del Rey watershed dated June 25, 2015.

1. In the model calibration, the correction factors were used for runoff volume, zinc loading and TSS loading. The correction factors were computed based on a comparison of measured values to modeled results. The model inputs were revised as necessary by adjusting appropriate model parameter, such as impervious cover and sediment wash-off potency factor, and then the model was run and compared with measured values. Include the values used for percentage of impervious area for each land use (as adjusted) and the sediment wash-off potency factor for each sub-watershed (as adjusted). The correction factor for TSS was applied to model output using a post-process adjustment. Provide the spreadsheet that contains this post-process adjustment. Further, data needed to improve model calibration for runoff volume, zinc loading, and TSS as well as MDR specific data to recalibrate the model for bacteria should be identified along with a commitment to collect the necessary data.
2. The critical condition for toxic pollutants was determined to be the year 2009 based on the MDR Toxics TMDL. Provide a statistical analysis, including a frequency curve of historical rainfall depth and rainfall intensity relative to the average and 50th percentile values for each metric to confirm that 2009 represents an appropriate condition for the RAA per the TMDL.
3. The model results of the baseline condition in terms of pollutant loading are provided in Table 10 through Table 14 of the Appendix C. However, the model results of the baseline condition in terms of runoff volume and pollutant concentration are missing in the report. Provide the model results of the baseline condition in terms of runoff volume and pollutant concentration as well. In addition, the duration curves or frequency curves of runoff volume, pollutant concentration and pollutant loading for the baseline condition at each analysis region for each pollutant of concern should be presented in the EWMP report to demonstrate that the model results of baseline condition are based on the TMDL-derived critical condition.
4. Provide the estimated allowable loads and required load reductions for each sub-watershed area on the same duration curves for baseline condition to illustrate the

estimated allowable loads and load reductions relative to and consistent with the TMDL derived critical condition.

5. In the report, summary statistics of load reduction and percent reduction for different control measures is provided as shown in Table 6-8. However, some numbers to arrive at the modeled values of load reduction and percentage are not readily identifiable. Clarify the data and analysis used to derive the numbers in Table 6-8. Ensure that the model results are presented in terms of 1) influent volume, concentration and load; 2) treated volume, concentration and load; and 3) effluent volume, concentration and load through a system of BMPs at the downstream of BMP systems for the selected critical year in the EWMP report to demonstrate the effectiveness of the proposed BMPs.
6. Finally, please provide an example validation within the Marina del Rey Watershed, or in another EWMP area where a similar RAA approach is used, that demonstrates that with all proposed BMPs in place, as determined from the initial analysis of the necessary volume and/or pollutant load reduction, will result in achieving the RWLs.
7. Discuss whether the model can be used to simulate non-stormwater runoff and to demonstrate that proposed volume retention BMPs will capture 100 percent of non-stormwater that would otherwise be discharged through the MS4 in each watershed area.
8. The continuous simulation model (CSM) was used to analyze the load reductions that may be achieved through various types of BMPs during the critical condition. Provide the detailed methodology of the CSM in the report and reference or include the model parameters used for each BMP as well.