Exhibit B: Beach Cities Watershed Management Group

The Natural Resources Defense Council ("NRDC"), Heal the Bay, and Los Angeles Waterkeeper ("LAWK") (collectively, "Environmental Groups") have identified several concerns with the Enhanced Watershed Management Program Work Plan ("EWMP Work Plan") and Draft Coordinated Integrated Monitoring Program ("Draft CIMP") for the Beach Cities Watershed Management Group, submitted by the City of Redondo Beach, City of Hermosa Beach, City of Manhattan Beach, City of Torrance, and Los Angeles Flood Control District,[1] which we discuss below.

This discussion, however, is not intended to provide an exhaustive list of deficiencies of the EWMP Work Plan and Draft CIMP. Nor does it, in general, address concerns with the Enhanced Watershed Management Program Work Plan for the Beach Cities Watershed.[2] For Environmental Groups' comments in response to the Beach Cities Watershed EWMP Work Plan, please see Environmental Groups' September 16th letter to the Los Angeles Regional Water Quality Control Board ("Regional Board"),[3] submitted under separate cover.

I. Specific Comments to the Draft Enhanced Watershed Management Program Work Plan for the Beach Cities Watershed

A. Beach Areas Regulatory Controls are Insufficient

The Beach Cities EWMP Work Plan states that "[t]he Beach areas within the geographic area of the Beach Cities WMG do not have any storm drains infrastructure that collects and discharges beach runoff directly to the receiving water and are therefore considered non-point sources and not subject to the MS4 Permit or EWMP requirements. Similarly, the Hermosa Beach and Manhattan Beach piers are not part of the MS4; they are non-point sources excluded from the MS4 scope and therefore the EWMP."[4] At a minimum, the EWMP should identify the regulatory framework that addresses these potential sources for water quality and TMDL compliance. For example, the Manhattan Beach Pier has two operational businesses on the pier, as well as fishing activities, that all have the potential to impact local beach water quality.

B. Previously Implemented BMPs and Receiving Water Limitations

The EWMP Work Plan discusses existing regional and distributed BMPs in the EWMP Group area. The EWMP Work Plan should discuss how appropriate baseline water quality conditions

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[1] City of Redondo Beach, City of Hermosa Beach, City of Manhattan Beach, City of Torrance, and Los Angeles Flood Control District. *Beach Cities Watershed Management Group Coordinated Integrated Monitoring Program* ("Beach Cities CIMP").

[2] City of Redondo Beach, City of Hermosa Beach, City of Manhattan Beach, City of Torrance, and Los Angeles Flood Control District. *Beach Cities Watershed Management Group Enhanced Watershed Management Program Work Plan* ("Beach Cities EWMP").

[3] Natural Resources Defense Council, Los Angeles Waterkeeper, and Heal the Bay. "Comments on Enhanced Watershed Management Program Work Plans and Monitoring Plans Pursuant to Requirements under the Los Angeles County Municipal Separate Storm Sewer System Permit, NPDES Permit No. CAS004001, Order No. R4-2012-0175." Letter to California Regional Water Quality Control Board, Los Angeles Region. 16 Sept. 2014.

[4] Beach Cities EWMP, at 3.

will be identified, given that these projects are already in place and potentially reducing pollutant loads. In addition, the EWMP Work Plan should discuss the operations and maintenance associated with installed BMPs, including but not limited to frequency of maintenance and monitoring data. This information would help to determine the potential efficacy of BMPs to meeting water quality objectives.

Also, existing and planned green streets projects appear to be missing from these lists. Green streets will likely play a key role in meeting the 2012 Permit's requirements.

The EWMP Work Plan notes that 95 percent of the BMPs to be implemented to meet receiving water limits and TMDL limits are already in place (Table 3).[5] However, the assertion is unsupported and it is unclear whether the reasonable assurance analysis ("RAA") confirms the assertion. No monitoring data are provided on the already-installed BMPs to determine their efficacy, thus making it difficult to assume that already implemented BMPs are meeting 95 percent of TMDL limits and receiving water limitations.[6]

C. The EWMP Work Plan Makes Inadequate Use of Data

The EWMP Work Plan states that "The reopened 2012 TMDL, which has not yet been approved by the [United States Environmental Protection Agency], modified this to weekly calculation of a rolling six week geometric mean using five or more samples, starting all calculation weeks on Sunday."[7] The EWMP Work Plan should calculate coliform geometric means based on the five most recent samples within a 30-day period. Calculating geometric means on a six-week interval underrepresents the water quality impairment.

The EWMP Work Plan states that "data for trash discharges from the MS4 are unavailable for the SMB Watershed," yet there are a number of existing BMPs already implemented by the Beach Cities WMG agency that capture trash, such as low flow diversions, trash excluders, catch basin inserts and hydrodynamic separators. If there are operation and maintenance reports that have this information, the data should be collected and used for the RAA.

For the Dominguez Channel Watershed Data Analysis, the EWMP Work Plan states that "Analyzed raw monitoring data were limited to data collected as part of the Mass Emission Station monitoring program established by the Los Angeles County Department of Public Works (LACDPW). No other data within the Dominguez Channel were known to exist."[8] The EWMP Work Plan could likely have included the SWAMP 2007Report, *Water Quality in the Dominguez Channel and Los Angeles/Long Beach Harbor Watershed Management Area*. While the data were collected in 2002-03, they may still be relevant to watershed planning, especially given that the EWMP Work Plan is already using S28 mass emission data from 2003 to 2013.

There are a number of freshwater receiving waterbodies within the Beach Cities Management Area. In addition, the Beach Cities EWMP Group Area receives downstream flows from

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[5] *Id*, at 21.
[6] *Id*, at B-17.
[7] *Id*, at A-11.
[8] *Id*, at A-17.

Madrona Marsh, Wilmington Drain, Machado Lake, and Dominguez Channel, all of which have a number of existing biological beneficial uses. From the EWMP Work Plan, it is unclear what types of data are available for these locations.

D. Source assessment is inadequate

There is no water quality, spatial, or statistical analyses of land-uses or pollutant loading included in the EWMP Work Plan to support the statement that "pollutants for the various water bodies within the Beach Cities WMG Area are essentially identical based on similarity of land uses…"[9] In reviewing the Draft CIMP's land use map,[10] it does not appear that all areas of the Beach Cities EWMP Management Area are homogeneous such that no consideration should be given to land uses or pollutant loading.

II. Specific Comments to the Draft Coordinated Integrated Monitoring Program

A. Rotating Storm Water Monitoring Schedule

Stormwater outfall-based monitoring is required to be conducted three times per year for all parameters except aquatic toxicity. (2012 Permit, Attachment E, at VIII.B.1.a.). The Beach Cities Watershed Management Group proposes a bi-annual stormwater outfall-based monitoring program for six of its seven outfalls within its management area.[11] In a given year, approximately 30 percent of the jurisdictional area is being monitored. It is unclear why a bi-annual approach was incorporated into stormwater monitoring and no justification is given for this approach. Furthermore, this bi-annual approach does not follow 2012 Permit requirements and should not be approved.

B. Significant Non-Stormwater Discharge

The definitions for significant non-stormwater discharges for Santa Monica Bay watershed and Dominguez Channel Watershed are unclear.[12] Also unclear is whether outfall screening water quality monitoring data will be used to determine significant non-stormwater discharges. Determining significant non-stormwater discharges based upon surface flow alone is inappropriate and does not account to pollutant loading via the sub-surface.

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[9] *Id*, at A-28.
[10] Draft CIMP, at 10.
[11] Beach Cities CIMP, at 30.
[12] *Id*, at 50.