



## Staff Report

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**Honorable Mayor and Members of the Hermosa Beach City Council  
Regular Meeting of June 8, 2021**

**APPROVAL OF THE REVISED ENHANCED WATERSHED  
MANAGEMENT PROGRAM AND REASONABLE ASSURANCE  
ANALYSIS FOR THE BEACH CITIES WATERSHED  
MANAGEMENT GROUP**

(Environmental Programs Manager Douglas Krauss)

**Recommended Action:**

Staff recommends City Council approve the Revised Enhanced Watershed Management Program (EWMP) and Reasonable Assurance Analysis (RAA) for the Beach Cities Watershed Management Group.

**Executive Summary:**

The current National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System Permit (MS4 Permit) requires permittees to submit an updated Enhanced Watershed Management Plan (EWMP) with an amended Reasonable Assurance Analysis (RAA) by June 30, 2021. Hermosa Beach and the Beach Cities Watershed Management Group partners (Beach Cities Group) have been working on an update, which includes both analysis of water quality data and control measure performance data, as well as an update of potential regional projects identified to help meet pollution reduction mandates. Staff recommends City Council review and approve the draft revised document (**Attachment 3**). If approved, staff would submit the updated EWMP to the Regional Water Quality Control Board.

**Background:**

The cities of Hermosa Beach, Torrance, Redondo Beach, Manhattan Beach, and the Los Angeles County Flood Control District formed the Beach Cities Group to develop an EWMP to comply with the Los Angeles Regional Water Quality Control Board's (Regional Board) 2012 MS4 Permit. The Beach Cities Group entered into an MOU to cost share the development of the EWMP and a Coordinated Integrated Monitoring Plan (CIMP) in 2013 (**Attachment 1**). The Beach Cities EWMP was submitted to the Regional Board and was approved by the Executive Officer of the Regional Board via a letter dated April 18, 2016 (**Attachment 2**). The Beach Cities Group was directed by the Executive Officer of the Regional Board to begin implementation of the EWMP immediately, including construction of identified capital projects.

At its October 27, 2020 meeting, City Council approved a Memorandum of Understanding (MOU) between the Beach Cities Watershed group to update the EWMP, for which the City of Redondo Beach is serving as lead. The MOU included the City's cost of \$107,963.33 towards its share of the EWMP update, as well as the City's contribution of \$160,000 approved at its July 28, 2020 meeting to help fund feasibility studies after the cancellation of the Greenbelt Infiltration project.

In addition to its many other components, the EWMP update identifies regional stormwater projects to ensure the group meets the pollutant reduction goals outlined in the existing EWMP. The City of Hermosa Beach and its Beach Cities Group partners are actively seeking alternate projects to achieve stormwater diversion and pollution reductions equivalent to what would have been achieved by the cancelled Hermosa Greenbelt Infiltration Project. The search for alternative projects involves reanalyzing existing concepts and researching new projects throughout the area with the goal of combining multiple smaller projects to achieve compliance goals. Additionally, the Regional Board recently approved a three-year extension of the group's primary pollution reduction deadline (Santa Monica Bay Bacteria TMDL), which allows the group until July 2024 to identify and construct projects. A formal request for a time extension on pollutant reduction goals will be considered as that deadline nears.

#### **Analysis:**

In addition to adapting the EWMP every two years as described in the MS4 Permit, the current MS4 Permit requires Permittees submit an updated EWMP with an updated Reasonable Assurance Analysis (RAA) by June 30, 2021. The RAA is the computer model, which predicts the pollutant load reductions needed to meet the MS4 Permit's numeric water quality limits. The updated EWMP and RAA must incorporate water quality data and control measure performance data, as well as any other information informing the adaptive management process gathered through December 31, 2020. The document also reflects new information or lessons learned from the group's implementation thus far of the EWMP. A working proposal of the next MS4 Permit, which will supersede the current permit, has been released by the Regional Board and will also require an updated EWMP and RAA every five years, consistent with the current requirement.

The updated Beach Cities Group EWMP (**Attachment 3**) builds upon and improves the original Beach Cities EWMP. Since the Beach Cities EWMP was approved in 2016, significant advancements have been made in stormwater project planning and RAA modeling. Additionally, the group has gained invaluable experience and insight with respect to implementation of the EWMP, understanding more about both the opportunities and challenges they face in successfully implementing effective stormwater projects.

In particular, the updated Beach Cities EWMP has been revised in the following critical ways:

- **Incorporation of newly available, EWMP-specific data.** The Beach Cities Group has been successfully implementing its Coordinated Integrated Monitoring Program (CIMP) since 2015,

resulting in five years of outfall and receiving water monitoring data from the EWMP area. Coupled with other regional studies and data, this has resulted in a more-definitive determination of whether MS4 outfalls are causing or contributing to receiving water exceedances.

- **Utilization of the recently updated, Countywide RAA modeling tool.** The revised RAA uses the newly released WMMS 2 modeling platform to maintain consistency with the majority of RAAs across Los Angeles County. In addition to its incorporation of remote sensing, water quality, and hydrology data, a key advantage of using the WMMS 2 model is the extensive regional calibration effort that has gone into the recent model update. This model was further calibrated and validated using Beach Cities CIMP monitoring data collected through June 30, 2020 to best reflect the baseline hydrology and water quality conditions within the Beach Cities EWMP Area.
- **A focus on multi-benefit regional projects.** Although distributed Best Management Practices (BMPs) are necessary and beneficial for watershed planning, regional projects are generally preferable, as they provide multiple benefits, are more cost-effective, and have a higher likelihood of receiving outside funding. The Beach Cities Group is committed to emphasizing regional, multi-benefit projects, including regional green streets, that seek to maximize community benefits and amplify other environmental objectives.

Incorporating these changes, the updated Beach Cities Group EWMP more accurately reflects the actual water quality and flow conditions in the EWMP area, provides updated, measurable milestones that can be tracked over time, and identifies implementable and cost-effective solutions to achieve compliance.

An important component of the EWMP update process is community engagement on the document's development and the identification of regional projects. The public relations consultant working on the project developed a website for the EWMP update that serves all the Beach Cities Group communities. They also hosted a virtual community meeting on May 19, 2021, where a high-level overview of the process was presented, and feedback was received on the proposed projects identified for each city. More information on the project and a link to the presentation are found on the project page of the City's website.

For Hermosa Beach, the EWMP and RAA update consultant team has identified the installation of dry wells that, in combination with the projects proposed in the other cities "upstream", should help Hermosa Beach meet its required storm water run-off volume reduction goals. A dry well is a bored, drilled, or driven shaft whose depth is greater than its width. These dry wells would most likely be prefabricated storage chambers or pipe segments. Dry wells are similar to a tube in the ground. No bigger than a few feet in diameter and marked at the surface by a maintenance access hole and inlet, they serve to temporarily store and subsequently infiltrate stormwater runoff.

Dry wells are more cost effective and logistically manageable than a large regional infiltration project and allow much greater flexibility for siting. For comparison, the capital projects identified in the City's original EMWP had a total estimated cost range of \$12.5-\$27 million (Greenbelt Infiltration Project and distributed green streets), while the EWMP update estimates \$6.5-\$8 million in capital project costs (for the proposed dry wells and Hermosa Avenue Green Streets projects). Dry wells proposed for the vicinity of Pacific Coast Highway and the neighborhood to the east could potentially provide the stormwater capture necessary (in conjunction with projects in our partner cities) to meet the mandates of the MS4 permit. These proposed dry wells will help satisfy the requirement of the EWMP update to identify potential projects, but final quantity and locations will be determined via further investigation and community engagement. Additionally, as other regional projects are studied and constructed, Hermosa Beach's required projects could be adjusted to incorporate revised treatment volumes and other types of pollution control measures.

### ***Past Council Actions***

<b>Meeting Date</b>	<b>Description</b>
November 12, 2013	Authorized an MOU with the Beach Cities Group to develop an EMWP and CIMP
June 23, 2015	Authorized submission of the draft EWMP to the Regional Water Quality Control Board and Adopt Los Angeles County Program Environmental Impact Report
February 9, 2016	Approved an MOU to develop and implement a CIMP with the Beach Cities WMG
July 28, 2020	Approved Dissolution of the MOU for the Greenbelt Infiltration Project and Reappropriated \$160,000 from CIP 542 to fund the feasibility studies
September 8, 2020	Council sent the draft MOU back to staff to revise
October 27, 2020	Council approved MOU for EWMP Update

### **General Plan Consistency:**

This report and associated recommendations have been evaluated for their consistency with the City's General Plan. Relevant Policies are listed below:

#### ***Infrastructure***

### **Goal 5. The stormwater management system is safe, sanitary, and environmentally and fiscally sustainable.**

#### **Policies:**

- **5.1 Integration of stormwater best practices.** Integrate stormwater infiltration best practices when initiating streetscape redevelopment or public facility improvement projects.
- **5.8 Low impact development.** Require new development and redevelopment projects to incorporate low impact development (LID) techniques in project designs, including but not limited to on-site drainage improvements using native vegetation to capture and clean

stormwater runoff and minimize impervious surfaces.

**Fiscal Implications:**

Per the EWMP Update MOU, the City of Hermosa will pay its share of \$267,963.33 in Fiscal Year 2020-21, which includes \$107,963.33 from CIP 401 EWMP Update/Feasibility Study for its share of the EWMP update and \$160,000 from CIP 542 Stormwater Urban Run-off Diversion Project committed by the City to fund feasibility studies as part of the dissolution of the Greenbelt Infiltration Project MOU. Should the feasibility studies final cost total less than \$160,000, the City will be reimbursed by the City of Redondo Beach for the difference. These costs are being tracked specifically for this purpose.

The cost of the capital projects identified in the plan (proposed dry wells and Hermosa Avenue Green Street) is estimated to be \$6.5-\$8 million. The City of Torrance has received a grant to fund the design and engineering of the Hermosa Avenue Green Street Project and is seeking additional grants for construction. The Fiscal Year 2021-22 Preliminary Budget includes funding of \$159,500 for CIP 164 Hermosa Avenue Green Street. Staff will continue to seek grant funding opportunities for the proposed projects and will seek future budget appropriations as project cost estimates are further developed.

**Attachments:**

1. 2013 MOU for Development of EWMP and CIMP
2. Current EWMP
3. Draft Updated EWMP

**Respectfully Submitted by:** Douglas Krauss, Environmental Program Manager

**Noted for Fiscal Impact:** Viki Copeland, Finance Director

**Legal Review:** Mike Jenkins, City Attorney

**Approved:** Suja Lowenthal, City Manager