

Comments on the Dominguez Channel & Harbors Toxic Pollutants TMDL Draft Staff Report (Problem Statement)
City of Los Angeles, Department of Public Works, Bureau of Sanitation, Watershed Protection Division

Comment #	Document Reference (Doc. #, Section #, Page #, Paragraph #)	Issue	Comments
1	Staff Report, Sections 1 & 2	Definition of areas included in TMDL	The areas to be included under the Dominguez Channel & Harbors Toxics TMDL need to be defined clearly and the responsible agencies in the watershed(s) need to be identified by area of ownership and percentage owned in table and map format. This is very important for determining what areas are to be addressed by the TMDL and how cost-sharing agreements between the responsible agencies will be drafted. In the staff report, it is stated that the following areas are to be included in the TMDL – (1) Dominguez Channel, (2) Waters associated with Los Angeles and Long Beach Harbors (and these are defined). It is assumed based on other language in the staff report that the Dominguez Channel Estuary is also to be included in the TMDL and this should be stated here. There are also local drainage areas in Long Beach that drain directly to San Pedro Bay and should be included in the TMDL; these areas include Los Cerritos Channel, Long Beach Marina, Alamitos Bay and all other direct drainage areas (i.e. – storm drain discharge) between Los Angeles River Estuary and San Gabriel River Estuary.
2	Staff Report, Page 9, Figure 1	Map of TMDL areas	Figure 1 should only show the areas included in the TMDL and should not show the Machado Lake & Wilmington Drain watershed because these areas were excluded from the TMDL. Because it is hard to see the entire watersheds and watershed boundaries, it may be helpful to split up Figure 1 into two maps, one being a zoomed-out map showing the entire Dominguez Channel watershed and scope of TMDL area, and another being a zoomed-in map of the Harbors and San Pedro Bay area.
3	Staff Report, Page 10, Paragraph 3	Inconsistent definition of TMDL areas	Since the Los Angeles and San Gabriel Rivers discharge into the San Pedro Bay and not directly into the Harbors, please rephrase your first sentence in this paragraph to read as follows, “The Harbors <u>and San Pedro Bay</u> receive the <u>freshwater</u> discharges of the Dominguez Channel, Los Angeles and San Gabriel Rivers, although the latter two watersheds are not the focus of these TMDLs,” for clarity of areas included in the TMDL.
4	Staff Report, Page 10, Paragraph 3 and 4	Inconsistent watershed	The statements “The Dominguez Channel watershed is approximately 345 square miles ,” and “The Dominguez Channel watershed drains an area of approximately 133 square miles ,” contradict each other. Please check the drainage area for accuracy and consistency.
5	Staff Report, Page	Definition of	The paragraph here seems to be defining the Dominguez Channel

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	10, Paragraph 4	hydrologic subunits for Dominguez Channel Watershed	Watershed into two hydrologic subunits as follows – (1) Areas that drain into Dominguez Channel, and (2) Areas that drain directly to the Harbors. The Dominguez Channel Watershed should only include areas that drain into Dominguez Channel. Areas that drain directly to the Harbors should be called the “Harbors Local Watershed” or something similar. Also, this area cannot be referred to as the Dominguez Watershed Management Area because the Machado Lake & Wilmington Drain subwatershed was excluded from the TMDL.
6	Staff Report, Page 10, Paragraphs 5 & 6	Reference to LA County DWP	Please correct the reference read “Los Angeles County Department of Public Works” instead of “Los Angeles County Department of Power and Water.”
7	Staff Report, Page 10, Section 2.1, Paragraph 6	Annual rainfall	It is not clear why the daily rainfall for the 2004-2005 year was mentioned. What implication does this have for use in the TMDL? Does this affect the limits? Is there a distinction and definition of dry vs. wet weather periods?
8	Staff Report, Page 11, Figure 1-2	Map of TMDL areas	Figure 1-2 was not included in the draft document, but the same comments as stated previously regarding definitions of drainage areas and areas to be included in the TMDL will apply.
9	Staff Report, Page 11, Table 1-3 and Land Use Discussion	Land Use Discussion	It is not clear how the Dominguez Channel Watershed (or Subwatershed) is being defined for the land use discussion. Do the land use percentages include only the areas that drain to Dominguez Channel or do they also include areas that drain directly to the Harbors? Is the Machado Lake & Wilmington subwatershed (which is often included under various definitions of “Dominguez Channel Watershed” and “Dominguez Watershed Management Area”) also included in the land use percentages? Please check and only use land use information for areas that apply in the TMDL and please specify what specific drainage areas were looked at for this exercise. Also, why were the land uses for Los Angeles and San Gabriel River Estuaries and the Long Beach local drainage areas not included?
10	Staff Report, Page 13, Table 2-1	Beneficial Uses	Why are the San Gabriel River Estuary and the Long Beach local drainage areas not shown in Table 2-1 for the discussion on Beneficial Uses?
11	Staff Report, Page 15, Paragraph 3	CTR saltwater criteria	It is not clearly stated that CTR saltwater criteria for protection of aquatic life is used in this TMDL although CTR saltwater criteria were shown in Table 2-2. Please state it in the paragraph.
12	Staff Report, Page 16, Paragraph 2, &	Adoption of sediment quality	The information in these two paragraphs should be updated to reflect that the State Water Resources Control Board adopted sediment quality

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	Page 17, Paragraph 1	objectives by State Board	objectives on February 19, 2008. (Resolution 2008-14).
13	Staff Report, Page 17, Section 2.3	TMDL Fact Sheets	There is no discussion on the TMDL Fact Sheets. Please include a brief description of the data and assessment used to 303(d) list the waterbodies. Also, please provide these fact sheets to stakeholders to assist during the TMDL development process.
14	Staff Report, Page 17, Table 2-4	Insert water column listing	Please insert another column showing the water column listing for the waterbodies.
15	Staff Report, Page 21, Table 2-7	2006 303d column	It is not clear what the symbols represent (especially the asterisks) in the 2006 303d column of Table 2-7. Please explain with a footnote. Please also put the numbers in the first column in order so it is easier to follow and link the data sources to the write-up in the document.
17	Staff Report, Page 22, Paragraph 2	CTR saltwater or freshwater criteria	Are CTR saltwater criteria or freshwater criteria used? It looks like CTR saltwater criteria are used here. Are saltwater acute values used for wet weather and saltwater chronic values used for dry weather? Please specify.
18	Staff Report, Page 31, Section 2.3, Paragraph 1	Summary of metals data	Please specify that copper, lead, and zinc exceeded only during wet weather and not during dry weather as discussed on page 22 of the TMDL.
19	Staff Report, Sections 2.4 & 2.5	San Gabriel River Estuary and Long Beach local drainage areas assessment	Please include assessment findings for San Gabriel River Estuary and Long Beach local drainage areas. If there are none, it should be noted in the TMDL along with a suggestion that a special study and/or more monitoring be conducted in this area.
20	Staff Report, Page 32, Section 2.4, Paragraph 1	Dominguez Channel freshwaters assessment	Please reword the first sentence to clearly state that dissolved copper, lead, and zinc exceeded numeric hardness-specific CTR criteria during wet weather only and that there were not any metal exceedances during dry weather.
21	Staff Report, Section 3.2	Use of ERL guidelines	The Dominguez Channel & Harbors Toxics TMDL appears to be using ERL/ERM guidelines as TMDL numeric targets. However, NOAA has stated: "The guidelines were not promulgated as regulatory criteria or standards. They were not intended as cleanup or remediation targets, nor as discharge attainment targets. Nor were they intended as pass-fail criteria for dredged material disposal decisions or any other regulatory purpose. Rather, they were intended as informal (non-regulatory) guidelines for use in interpreting chemical data from analyses of sediments." Therefore, the City (as stated in previous comments to Toxics TMDLs in other

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			watersheds) does not agree with the Regional Board staff use of ERL/ERM guidelines as numeric targets in the context of the TMDL.
22	Staff Report, Page 37, Table 2-17	Listings of impairments resulting in TMDLs	<ul style="list-style-type: none"> ▪ Waterbodies column: This needs to be titled / labeled correctly. (Torrance Carson Lateral, Fish Harbor, Cabrillo Marina) ▪ Metals column: For the Dominguez Channel (freshwater), please add language to indicate that the Cu, Pb, and Zn assessment is for wet weather only for the metals criteria were not exceeded in dry weather. ▪ Toxicity Column: Please complete this column for all the waterbodies, for instance, identify if Torrance Carson Lateral and Cabrillo Marina are for water column or sediment. ▪ Cabrillo Beach – Cabrillo Beach (inner) is not listed on the 2006 303(d) list for anything, and the 2002 303(d) list does not list it for PAHs. Cabrillo Beach (outer) is not listed on 2002 or 2006 303(d) list for PAHs. Please explain why the assessment was made that there are DDT and PCBs impairments of Cabrillo Beach. Supporting data was not shown in the staff report.
23	Staff Report, Page 38, Table 3-1	Incorrect calculation	Cadmium CTR freshwater chronic value should be <u>1.14</u> (ug/L), not <u>1.44</u> . Please check your calculation.
24	Staff Report, Page 38, Table 3-1	Incorrect number, missing footnote #2	The total PCBs CTR freshwater chronic value should <u>0.014</u> , not <u>0.0002</u> . Please check and correct. Also, footnote #2 after Total PCBs is missing.
25	Staff Report, Page 38, Table 3-1	Hardness Value	Why was a hardness of 40 ppm used to set the freshwater metal values? Please provide any supporting data and documentation.