

Table 1 Comment and Response

Comment No.	Comment and Necessary Revision	Action	Page
1	Revise Table 1.3 to add DDT (sed.) as a Category 1 pollutant for Machado Lake.	DDT (sed.) added to Table 1.3 as a Category 1 pollutant for Machado Lake.	13
2	Revise the final allocation values for PCBs/DDT/Dieldrin/Chlordane in Tables 3.6b (footnote 4) and 3.7 to be consistent with the Los Angeles and Long Beach Harbors Toxic and Metals TMDL target values.	Table 3.6b is now Table 3.7b and footnote 4 is now footnote 2 in Table 3.7b. The values expressed by footnote represents portion of toxics in TSS.	48
3	Revise the interim and final dates in Table 1.4 to be consistent with Attachment N Part C.2 of the LA County MS4 Permit.	Table 1.4 revised per comment	16
4	Revise the RAA to address the following:		
	<ul style="list-style-type: none">a. Incorporate the RAA revisions submitted to the Los Angeles Water Board on April 18, 2018 to the Supplement.b. Clearly define "Implementation Area" and the 85th Percentile basins on figures. Confirm and clarify in a footnote to Table 3.6a that the sub-areas listed cover the entire "Implementation Area" shown in Figure 1.1. That is, the area, total runoff volume, and baseline loads for "Airport" include the sum of those for AS1, AS2, and AS3 subcatchments as shown on Figure 5.4; "Walnut Sump" includes WS-1, WS-2, and WS-3 subcatchments as shown on Figure 5.8; and "Baseball Field" includes BB-51, BB-52, BB-53, and BB-54 subcatchments as shown on Figure 5.13.	<p>RAA revisions incorporated per comment</p> <p>Implementation Area and 85th Percentile Basin identified on all relevant figures. Footnote to Table 3.7a and 3.7b (Table 3.6 now 3.7) revised per comment</p>	<p>43 - 51</p> <p>50 - 51</p>

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	<p>c. Explain how the small area in Figure 5.3, situated between Walnut Sump Sub-area to the north, and Airport Sub-area to the south, is addressed. It does not appear to be a part of either area based on an examination of Figures 5.4 and 5.8, though it seems it should be included in the Walnut Sump Sub-area based on the storm drain network shown on Figure 5.8.</p> <p>d. Revise Tables 3.6a and 3.6b to reflect the total annual runoff volume generated from the Walteria sub-area, as simulated for 2005. Add a footnote to tables to explain that not all runoff generated in this sub-area is ultimately discharged to Machado Lake, because of how Walteria Lake is managed as a stormwater detention basin. Add a figure to clarify the subwatershed areas related to Tables 3.6a/3.6b and 3.7. Exclude load from Walteria Lake during pumping periods.</p> <p>e. The baseline loads for runoff volume, TSS, TN, TP, and "Toxics" are presented in Table 3.6a. Revise this table to list the baseline concentrations and loads for fecal coliform, lead, copper, and the specific toxic pollutants (PCBs, DDT, Dieldrin, and Chlordane).</p> <p>f. Include the specific calculations relating toxic pollutant load reductions to TSS load reductions for each drainage/sub-drainage area and option, as presented in Tables 5.5, 5.6, 5.7, and 5.9. (Appendix G provides</p>	<p>The small area in question is called the 237th Street Basin. This is designated as 85th Percentile Basin and as such excluded from the Implementation Area.</p> <p>Tables 3.6a and 3.6b now Tables 3.7a and 3.7b have been revised per comment.</p> <p>Figure 3.5 included to explain sub areas listed in Tables 3.7a and 3.7b.</p> <p>Table 3.6a now Table 3.7a revised per comment</p>	<p>8</p> <p>50 - 51</p> <p>42</p> <p>50 - 51</p> <p>44</p>

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	general information relating toxic pollutant load reductions to TSS load reductions.) Present load reduction by subbasin in Table 5.7. Include volume reduction in Table 5.7 where applicable.	Calculation relating to toxic pollutant load reduction is included in the report	
5	In Table 5.2, add Walteria Lake and note that it is managed as a stormwater detention basin. Indicate its capacity relative to the 85th percentile, 24-hour volume for the Walteria Lake Subcatchment shown on Figure 5.4.	Table 5.3 is revised to include Walter Lake Sub Area as per comment.	81
6	Address “Airport Southeast” sub-area in Section 5.3.4. This could be accomplished by collaborating with other LA County MS4 Permittees to address runoff from this area (e.g., Palos Verdes Peninsula EWMP Group). Add table and description for “Alta Loma Watershed” at southeast tip of the City and describe proposed BMP for Alta Loma Park.	Airport Southeast Sub Area addressed in in Section 5.3.6 originally Section 5.3.4.	94 -96
7	Correct text in Section 5.3.4.2, Subcatchment AS-1, which states on pg. 69 that, “The load reductions listed in the table are based on volume reduction.” Stormwater from Subcatchment AS-1 is being treated solely with catchbasin filters and street sweeping; therefore, Road reductions cannot be a result of volume reduction. Throughout the document, revise references to catch basin filters as volume capture/retention BMPs to treatment BMPs (Section 5).	Section 5.3.4.2 is now Section 5.3.5.2. Text corrected as per comment.	84

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8	<p>Revise Table 5.6 to add a column for annual runoff volume values "Before BMP," "After BMP," and "% Volume Reduction" for each subcatchment, AS2 and AS3.</p> <p>Correct and/or clarify discussion in Sections 5.3.4.1 and 5.3.4.2, related to Subcatchments AS-2 and AS-3. For example, at the top of pg. 68, it states that the total capacity of sites A1 and A2 is 34.4 ac-ft and, therefore, AS2 and AS3 can be designated as "85th Percentile Basins." Similarly, on pg. 70, BMP capacity at sites A1 and A2 is compared to the 85th percentile, 24-hour volume of subcatchments AS2 and AS3. However, BMP sites A1 and A2 do not address Subcatchment AS3, according to pg. 66. According to the plan, they address Walteria Lake discharges and Subcatchment AS2, respectively. Though, on pg. 70, it is suggested that runoff from subcatchments AS2 and AS3 will be treated at site A2 (though it only has a capacity of 12 ac-ft, while the volume associated with AS2 and AS3 totals 30 ac- ft per Table 5.3.</p>	<p>Table 5.6 is now Table 5.7. New table updated as per comment.</p> <p>Clarified under section 5.4.2 and in Table 5.6. Section 5.3.4.1 has been deleted and discussion on 85th Percentile 24-hour storm can be found under section 3.6.1</p>	53, 83 and 84
9			
10	Update discussion in Sections 5.3.4.1 (pg. 67) and 5.3.4.3 (pg. 80) to include BMP Site A3, which according to the conference call with the City on 4-26-16, is being pursued to address stormwater from Subcatchment AS3.	Clarified under section 5.4.2 and in Table 5.6. Section 5.3.4.1 has been deleted and discussion on 85th Percentile 24-hour storm can be found uder section 3.6.1	83 and 84
11	Clarify which area (on Figure 5.8) represents the drainage area to SD-1040 (i.e. WS-3).	Clarified. See Figures 5.8 and 5.9	97 and 99
12	Correct Section 5.3.5 on pg. 83 to indicate that Option 1 is the recommended option, not Option 2. Also in Section 5.3.5, make	Corrected under Section 5.4.4.1	104

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	consistent the discussion on pg. 83 and pg. 91 regarding the order of Phases I-III.		
13	Align Figures 5.8 and 5.9 so that they show the same subcatchments for the Walnut Sump sub-area. Currently, Figure 5.8 shows three subcatchments, while Figure 5.9 shows only two. Relatedly, revise Section 5.3.5 to match subcatchment nomenclature in the figures. Currently, the text refers to "subarea SD-1040," yet the Figures use WS-1, WS-2, and WS-3 to name subcatchments. Additionally, clarify that SD-1040 refers to the storm drain ID and not the subarea.	Corrected per comment	97 and 99
14	Confirm that, and revise, Table 5.9 to indicate that the load reductions presented are for Option 1. Break down the table data by subcatchment, i.e., WS-1, WS-2, and WS-3. Clarify whether any portion of the load reductions in Table 5.9 is attributable to the catchbasin filters to be installed in WS-1. (According to the text, the answer to this is "no": "The simulations do not include non-structural BMPs such as ... catch basin filter." (pg. 83). If this is the case, Table 5.9 would only indicate pollutant load reductions associated with volume reductions in WS-2 and WS-3. Note (1) should also be revised or deleted, as appropriate.)	Table updated per comment. Table 5.9 is now Table	83 -103
15	Include bacteria and metal reductions in Table 5.9 for WS-2 and WS-3, and include runoff volume reduction in all load reduction tables where applicable.	Relevant tables updated per comment. See tables	83 - 103

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16	Revise Table 5.9 to add a column for annual runoff volume for each subcatchment "Before BMP," "After BMP," and "% Volume Reduction."	Revised per comment. See tables	83-103
17	Revise Table 5.11 to break down the table data by subcatchments within Option 1 and Option 2, i.e., BB-51, BB-52, BB-S3, BB-54. Clarify what portion, if any, of the load reductions in Table 5.11 is attributable to the catch basin filters to be installed in BB-S1, BB- 52, and BB-S4 under Option 1, and in the applicable subcatchments in Option 2 (where 23 full capture filter screens would be installed). (The text and table are inconsistent. The text states, "Table 5.11 shows the load reduction associated with each option. The load reductions listed in the table are based on volume reduction", while Note (1) to Table 5. 11	Revised per comment. See	83 - 103
18	Revise Table 5.11 to add a column for annual runoff volume for each subcatchment under Option 1 and Option 2 for "Before BMP," "After BMP," and "% Volume Reduction."	Revised per comment but in Tab... for preferred option only.	83 - 103
19	Add to Tables 5.6, 5.9 and 5.11 columns for bacteria, copper, and lead, for subcatchments AS2, AS3, BB-53, WS-2, and WS3 (all 85th percentile subcatchments), indicating load "Before BMP," "After BMP," and "% Load Reduction" based on a linear relationship to volume reduction in these subcatchments and the baseline loads pulled from WMMS for these areas.	Bacteria, copper and lead are added to relevant tables.	83 - 103
20	Update Table 5.1 on pg. 56 to include bacteria and metals (lead and copper).	See response to comment 19	66
21	Revise Table 5.2 (pg. 58) to remove "filters" from title and column headings as this table is only a summary of the number of	Corrected	66

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	catchbasins in the Implementation Area.		
22	Ensure that it is clear for all tables of load reductions from quantified BMPs, which BMP Option(s) are being evaluated.	BMP Option(s) evaluated are indicated in all relevant tables	82 -103
23	In Section 6.3, in Table 6.2 on pg. 109, total BMP treatment capacity for AS3 is listed as 38 ac-ft, while in Table 5.3 it is listed as 32.8 ac-ft. Please clarify or correct.	Corrected	127
24	Revise Section 6.6 to clarify that the proposed BMPs have sufficient capacity to capture and infiltrate the 85th percentile, 24-hour volume from Subcatchments AS2, AS3, WS2, WS3, and BB-53, while the remaining Subcatchments (including AS1, WS1, BB-S1, BB-52, and BB-S4) will be addressed through distributed BMPs and non-structural BMPs (such as catchbasin filters and street sweeping), and may be addressed through additional structural BMPs in the future. Also, indicate whether proposed BMPs for Walteria Lake and Airport Southeast Subcatchments have sufficient capacity to capture and infiltrate the 85th percentile, 24-hour volume.	Clarified	129
25	Update Table 9.2 to include BMP at Site A3.	Updated	144
26	Revise Section 3.2.1 to assess potential sources of lead and copper (not zinc) to the EWMP area. Revise Section 3.5 to include base loads for copper by sub-area.	Revised	34 - 36
27	Revise all sections describing the various Options and Phasing for proposed BMPs to clearly and correctly identify which Option the City has selected and the recommended phasing associated with the chosen Option.	Relevant section revised per comment	92 -103
28	Revise terms such as "Potential BMP(s)" and "Potential Nonstructural BMP(s)" to "Proposed BMP(s)" and "Proposed Nonstructural BMP(s).	Revised per comment	70 - 103

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29	Complete the RAA for Category 2 and 3 pollutants as identified in Table 1.3 and revise the Supplement to include the modeling results in the appropriate sections/tables/figures. (Baseline loads have been presented, but an evaluation of load reductions based on the proposed structural BMPs has not been performed.)	RAA completed for Category 2 and 3 pollutants and results added to all relevant tables	83 - 105
30	Attachment G of the Implementation Plan includes technical details for the catch basin filters proposed for implementation in the BMP Implementation Area but clearly states that Coliform bacteria are not effectively removed by the skimmer boxes. Hence, the proposed catch basin inserts are not suitable for addressing bacteria as a pollutant and should not be considered in the RAA for such purpose.	The City is proposing to use catch basin filters with design elements targeting bacteria.	69
31	Specify how proposed BMPs will address Category 2 and 3 pollutants for Wilmington Drain and Machado Lake (i.e. pollutant load reduction, volume capture).	Addressed	83 - 105
32	Revise the Supplement to explicitly state that MCMs will be implemented as written in the LA County MS4 Permit, or that they will be enhanced (as described in the Supplement).	Revised per comment. See Section 4.1.1	56 and 94
33	Revise Financial Strategy Section 9.3 as follows: <ol style="list-style-type: none">Include the amount and source of current monetary funds to install and implement the BMPs proposed for the milestones in the current permit cycle.Provide a timeline to search for funding with consideration of the milestones indicated in the Supplement.The City's annual budget for catch basin cleaning and street sweeping is provided in Section 9.3. Revise this section to include information on the City's annual budget for its entire stormwater program. Describe how the selection of program/projects and schedules maximizes the effectiveness of funds through the analysis of alternatives, and addresses human health and water	Information requested included in Section 9.3.	146 - 147

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	quality related challenges and non-compliance.		
34	<p>Correct the typographical errors on the following pages/sections:</p> <ul style="list-style-type: none">a. Section 2.1, pg. 15: correct statistic on % of City in TMDL Implementation Area; percentage should be 32% not 23%.b. "catch basin filter" – Table 4.2 under Pollutant Source (should say catch basin or catchment area)c. "...refinement of the MdR EWMP." — page 129d. Correct the pollutant load titles and measurements (kg/yr vs. lb/yr) to be consistent between Tables 5.4, 5.5, and 5.6.e. Correct Table 3.6b footnotes (4) and (5). Table 3.6b contains footnotes (4) and (5) under the Table, but there are no (4) or (5) notations within the table (only notations 1, 2, and 3 are actually in the table).f. Correct value for TP load after BMP for Option 1 in Table 5.11.g. In Section 6.2, the reference to Table 11 is unclear on pg. 108. There does not appear to be a Table 11.	<p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected - all relevant tables</p> <p>Corrected</p> <p>Corrected</p>	<p>21</p> <p>58</p> <p>147</p> <p>83 and 89</p> <p>83 -89</p> <p>127</p>