

	EWMP Reference	MS4 Permit Provision	Summary of Comments and Necessary Revisions	Beach Cities Group Response
1	Page ES-3 and Figure ES-1; Page 1-4 & Figure 1-1		Clarify whether the Del Amo Basin also has no outlet, as it appears from Figure ES-1 and Figure 1-1 to also be excluded from the EWMP.	Text added to pg ES-3 and 1-4: "The Del Amo Retention Basin has no outlet, and is sized to capture runoff from the 85th percentile, 24 hour storm event. Because the Del Amo Retention Basin is within the Machado Lake Watershed, this drainage area is excluded from the EWMP."
2	Table ES-8		Revise Table ES-8 of the draft EWMP to clarify that for metals, the WLA assigned to MS4 discharges is a mass-based allocation based on the freshwater targets for Dominguez Channel and Torrance Lateral (using ambient hardness at the time of sampling) multiplied by the daily volume and is shared amongst all MS4 Permittees that discharge to the freshwater portion of Dominguez Channel and Torrance Lateral. The table may include a note that MS4 Permittees may demonstrate compliance with the freshwater metals allocations for Dominguez Channel and Torrance Lateral may be demonstrated via any one of three different means: a. Final allocations are met. b. CTR total metals criteria are met instream. c. CTR total metals criteria are met in the discharge.	The paragraph above Table ES-8 has been revised to reflect this language. A footnote has also been added to the table that says, "MS4 Permittees may demonstrate compliance with the freshwater metals allocations for Dominguez Channel and Torrance Lateral may be demonstrated via any one of three different means: a. Final allocations are met. b. CTR total metals criteria are met instream. c. CTR total metals criteria are met in the discharge."
3	Section 3.6.4		Correct the typographical error in Section 3.6.4 subsection Powerline Easement Filtration of the draft EWMP to substitute "Error ! Reference source not found ." with the applicable figure reference.	Error has been corrected.
4	Table 4-2 footnote 2		Correct the typographical error in Table 4-2 of the draft EWMP where the reference to footnote 2 is missing from the table.	Missing footnote references have been added in the table for notes 2 and 3. Footnotes also updated in Table ES-12 to match Table 4-2.
5	Figure ES-2, 2-5, Table ES-4, & 2-6		Add outfall SMB 0-07 to Figure ES-2, Figure, 2-5, Table ES-4, and Table 2-6 of the draft EWMP.	Outfall SMB 0-07 location has been added to the figures and SMB-6-02 has been relocated to a more accurate location, 100 yd south of the Redondo Beach Pier. A footnote was added to the tables that says, "The drainage area to Outfall SMB-O-07 is encompassed by analysis region SMB-6-02; therefore SMB-O-07 was analyzed as part of analysis region SMB-6-02."
6	Table ES-5, ES- 10, & 6-2		Clarify that the storage volume in Table ES-5, ES-10, and 6-2 of the draft EWMP are design storage volumes (i.e., effective depth X footprint of the BMP).	Column header changed to say "design storage volume" in all three tables. Also, In Table ES-5, the description of the Manhattan Beach Infiltration Trench BMP says that the BMP has a 2 acre footprint and a depth of 2 ft. However, these stated dimensions do not equate to the stated 198,000 ft3 of storage. The issue here is that the actual footprint is 2.2 acres, and the actual depth is 2.1 ft. Improper rounding was used here. We have confirmed that the 198,000 ft3 volume is appropriate, as this is what the RAA analysis was based on. For the revised EWMP, we have updated the text appropriately.
7	Table 2-11 & 2-13		Update Table 2-11 and 2-13 of the draft EWMP to correctly label "Treatment Volume" as "Design Storage Volume" .	Tables have been revised accordingly.
Water Quality Characterization				
8	Section 2.2 .1 & 3.2.1	Part VI.C.5.a.i (page 60)	Section 3.2.2 under subsection Category 3 - Medium Priority in part summarizes the evaluation of data that were considered for Dominguez Channel Watershed. Section 2.2. and 3.2. of the draft EWMP must specify if the EWMP includes an evaluation of existing water quality conditions, including characterization of stormwater and non-stormwater discharges from the MS4 as well as receiving water quality to support identification and prioritization/sequencing of management actions, to the extent possible based on available data. Describe what data were used (e.g., wet and dry weather mass emissions station and tributary monitoring in Dominguez Channel per 2001 Permit, TMDL monitoring, regional monitoring conducted through the Bight monitoring program, bioassessment monitoring data).	Text has been added to sections 2.2.2 and 3.2.2 to specify that the EWMP does include an evaluation of existing water quality conditions, and to describe the data that were used. Explicit reference has also been made to Appendix A of the EWMP (TM 2.1), which describes the data analyses in further detail.

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9	Executive Summary	Part VI.C.5. a.ii (page 60)	The last sentence of the Executive Summary under the Dominguez Channel Watershed section of the draft EWMP states the following: "These parameters will be monitored under the Beach Cities' CIMP and if future monitoring data suggest that the Beach Cities' MS4s may cause or contribute to cadmium exceedances in the receiving water, the EWMP will be revised to address these pollutants." It is unclear if the re-evaluation of CIMP data applies to only cadmium exceedances as aforementioned or it also applies to ammonia (for Dominguez Channel) and category 3 pollutants for Torrance Lateral. Clarify that the re-evaluation of CIMP data applies to all category 2 and category 3 pollutants.	Sentence revised in the Executive Summary and Section 3.2.2 to say the following: "These Category 2 and 3 parameters will also be monitored under the Beach Cities' CIMP and if future monitoring data suggest that the Beach Cities' MS4s may cause or contribute to exceedances of these pollutants in the receiving water, the EWMP will be revised to address these pollutants."
10	Table ES-7, 3-4, ES-8, 3-6, ES-12, 4-2 & Section 3.2.2	Part VI.C.5.a.ii.(1) (page 60)	<p>As per Attachment K Table K-13, the City of Torrance is subject to the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL) for Dominguez Channel Estuary. Therefore, revise Table ES-7, Table 3-4, Table ES-8, Table 3-6, Table ES-12, Table 4-2, and Section 3.2.2 subsection Category 1 of the draft EWMP to include the Water Body-Pollutant Combinations (WBPCs) for Dominguez Channel Estuary.</p> <p>Additionally, revise relevant sections of the EWMP (e.g., source assessment, watershed control measures, RAA, etc.) to address WBPCs for Dominguez Channel Estuary. Alternatively, provide a rationale and support for why Dominguez Channel Estuary WBPCs will not be addressed in the EWMP.</p>	<p>-Table ES-7 has been revised to include category 1 and 2 pollutants for DC Estuary.</p> <p>-Table 3-4 has been revised to include category 1 and 2 pollutants for DC Estuary.</p> <p>-Table ES-8 and 3-6 were not updated but text was added prior to the tables that says, "The wet weather Reasonable Assurance Analysis was performed on copper, lead, zinc, and bacteria (fecal coliform) within the Dominguez Channel Watershed. Water quality targets were identified for Dominguez Channel Watershed in the same manner as in SMB Watershed. It was assumed that if pollutant targets are met in Dominguez Channel, the targets are also being met downstream in the Dominguez Channel Estuary, which is the receiving water to Dominguez Channel. As a result, it was not necessary to perform a separate Reasonable Assurance Analysis for the Dominguez Channel Estuary, since it is assumed that water quality objectives in Dominguez Channel are protective of objectives in Dominguez Channel Estuary."</p> <p>-Table ES-12 has been revised to include category 1 and 2 pollutants for DC Estuary.</p> <p>-Table 4-2 was updated to also reflect dry weather implementation action for DC Estuary Category 1 pollutants (copper, lead, zinc).</p> <p>- Section 3.2.2 was revised to include Dominguez Channel Estuary.</p> <p>- Changes were also made to section 3.7.3 Dry Weather, as part of the RAA Results section (3.7).</p> <p>- Text added to section 3.4.1-- "It was assumed that if pollutant targets are met in Dominguez Channel, the targets are also being met downstream in the Dominguez Channel Estuary, which is the receiving water to Dominguez Channel. As a result, it was not necessary to perform a separate RAA for the Dominguez Channel Estuary."</p>
11	Section 2.2.2 footnote 9	Part VI.C.5.a.ii.(1) (Page 60)	Section 2.2.2, footnote 9 of the draft EWMP shall also address the sediment toxicity 303(d) listing for Santa Monica Bay by summarizing USEPA's data evaluation, which showed only 3 out of 116 samples exhibited toxicity. USEPA made a finding in the TMDL that, following the California listing policy, Santa Monica Bay is meeting the toxicity objective and there is sufficient evidence to delist sediment toxicity. EPA therefore concluded in the TMDL that there is no significant toxicity in Santa Monica Bay and recommended that Santa Monica Bay not be identified as impaired by toxicity in the California's next 303(d) list.	Footnote now reads, "SMB Offshore/Nearshore is 303(d)-listed for fish consumption advisory due to DDT and PCBs. Therefore, the fish consumption advisory will be assumed to be addressed by the DDT and PCB categorization. SMB Offshore/Nearshore is also 303(d) listed for toxicity. USEPA's data evaluation showed only 3 out of 116 samples exhibited toxicity. USEPA made a finding in the TMDL that, following the California listing policy, Santa Monica Bay is meeting the toxicity objective and there is sufficient evidence to de-list sediment toxicity. EPA therefore concluded in the TMDL that there is no significant toxicity in Santa Monica Bay and recommended that Santa Monica Bay not be identified as impaired by toxicity in the California's next 303(d) list."
12		Part VI.C.5.a.ii (page 60)	Revise the draft EWMP to clearly specify all applicable interim and final numeric Water Quality Effluent Limits/Receiving Water Limits (WQBELs/RWLs) (for both dry weather and wet weather, where applicable) for Category 1,2, and 3 WBPCs.	Interim and final numeric WQBELs/RWLs have been added to Tables 2-3 and 3-4.

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13	Executive Summary, Table ES-7, 3-4, & Section 3.2.2	Part VI.C.5.a.ii.(2) (page 60)	<p>Revise Table ES-7, Table 3-4, and Section 3.2.2 of the draft EWMP to include ammonia as a category 2 pollutant for Dominguez Channel (including Torrance Lateral), while referring to the discussion on pages ES- 17 and page 3-6 in the main body of the EWMP. Include the monitoring data from monitoring sites S28 and TS19 referenced on page ES-17 and page 3-6 that indicates that ammonia objectives are being achieved. The group may also present data and information regarding the contribution, or lack thereof, of ammonia from MS4 discharges to Dominguez Channel, if available.</p> <p>Additionally, in the Executive Summary under the subsection for Dominguez Channel Watershed and in Section 3.2.2, include a brief discussion to explain why diazinon is not included as a category 2 pollutant for Dominguez Channel (including Torrance Lateral), by citing findings in the Harbors Toxics TMDL Staff Report, which states, "Whereas elevated diazinon levels had been observed concurrently with toxicity in 2002-2005 wet weather samples and therefore diazinon was presumed to be contributing to adverse toxicity results; post-2005 results show no diazinon concentrations above the freshwater guideline. Therefore, it is appropriate to develop freshwater metals and toxicity TMDLs for wet weather; however, the more recent toxicity results are not attributable to diazinon and therefore no diazinon TMDLs have been developed for Dominguez Channel" (Section 2.6.1 of TMDL Staff Report).</p>	<p>Ammonia has been added to the necessary tables as a category 2 pollutant for DC. Appendix R has also been added to the EWMP to present the ammonia monitoring data and analysis from S28 and TS19 to show the objectives are being achieved.</p> <p>An explanation for why diazinon is not included as a Category 2 pollutant has been added to the ES and Section 3.2.2-- "Dominguez Channel is also 303(d)-listed for diazinon, although data are not available on the SWRCB's website since this listing was made prior to 2006. However, as the Dominguez Channel Toxics TMDL staff report states, the USEPA banned diazinon on December 31, 2005. The Dominguez Channel Toxics TMDL staff report (Section 2.6.1) states, "Whereas elevated diazinon levels had been observed concurrently with toxicity in 2002-2005 wet weather samples and therefore diazinon was presumed to be contributing to adverse toxicity results; post-2005 results show no diazinon concentrations above the freshwater guideline. Therefore, it is appropriate to develop freshwater metals and toxicity TMDLs for wet weather; however, the more recent toxicity results are not attributable to diazinon and therefore no diazinon TMDLs have been developed for Dominguez Channel." Dominguez Channel and Torrance Lateral data from 2006-2013, which includes 85 total samples between the two monitoring sites, show no exceedances of the chronic diazinon criteria established by the California Department of Fish and Game (0.10 ug/L). Due to the fact that monitoring data since 2006 show that all samples at S28 and TS19 meet the applicable water quality criteria for diazinon, diazinon could reasonably be removed from the State's 303(d) list for Dominguez Channel and therefore is not included as a Category 2 pollutant for Dominguez Channel (including Torrance Lateral)."</p>
14	Section 3.2.3	Part VI.C.5.a.iii.(1). (a) (page 60- 61)	<p>Section 3.2.3 of the draft EWMP must include a source assessment discussion on 303(d) listed pollutants ammonia and diazinon. (See comments above.)</p>	<p>Added the following text to the respective sections:</p> <p>"Generally, ammonia enters urban creeks via anthropogenic sources or discharges such as municipal effluent discharges, agricultural runoff, and natural sources such as nitrogen fixation, the excretion of nitrogenous wastes from animals, and runoff from agricultural lands (USEPA, 2013a)."</p> <p>"Generally, diazinon in urban creeks may be attributed to urban runoff that contains pesticides as a result of such activities as application by businesses and individuals who apply them for structural pest control, landscape maintenance, agricultural, and other pest management purposes (Werner, et al., 2002)."</p>
15	Executive Summary	Part VI.C .5.b (page 62-66)	<p>The Executive Summary under BMPs - Santa Monica Bay states that "it should be noted that if at any time in the future, specific distributed green streets or regional/centralized BMPs are found to be infeasible for implementation, alternative BMPs or operational changes will be planned within the same subwatershed and within the same timeline, to meet an equivalent subwatershed load reduction. In addition, if monitoring data indicated that more easily implementable, alternative BMPs can provide equivalent (or superior) load reductions, these alternative BMPs may be implemented at the discretion of the WMG Agencies." Likewise, the Executive Summary in the BMPs - Dominguez Channel section of the draft EWMP states the following: "It should be noted that if at any time specific distributed green streets or regional/centralized BMPs are found to be infeasible for implementation, or new innovative BMPs are developed, alternative BMPs or operational changes will be planned within the same analysis region and within the same timeline, to meet an equivalent analysis region load reduction. The performance of the proposed catch basin inlet filters within the City of Torrance will also be evaluated as potential alternatives to the proposed structural BMPs within the Cities of Redondo beach and Mangattan Beach. " This is a reasonable approach. However, the Group should provide timely notification to the Regional Board of any project substitutions and provide project details.</p>	<p>Comment has been noted, and timely notification to the Regional Board will be provided in such a case.</p>

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16	Executive Summary footnote 2 & Section 1.2 footnote 8	Part VI.C.5.b.iv.(3) (page 64)	<p>The Executive Summary footnote 2 and Section 1.2 foot note 8 of the draft EWMP states that "[f]or reference, the [Machado Lake Nutrients and Toxics TMDL] Implementation Plan is attached to this EWMP as Appendix D, but it should be reviewed separately from this EWMP." Therefore, the EWMP does not address Machado Lake TMDLs (i.e. trash, nutrients, pesticides, and PCBs). Although the implementation of the Machado Lake Implementation Plan is an acceptable approach, the Machado Lake BMP implementation Plan (October 2014) as a stand-alone document does not adequately address all the requirements of an EWMP.</p> <p>Note that as per Attachment K Table K-4 of the LA County MS4 Permit, the City of Redondo Beach and the City of Torrance are subject to the Machado Lake TMDLs. Additionally, as per the LA County MS4 Permit, the Group must incorporate control measures that have been identified in applicable implementation plans. Therefore, the Machado Lake Implementation Plan should be considered a part of the EWMP where Machado Lake TMDLs should be addressed by the EWMP for the City of Redondo Beach and City of Torrance. If the Machado Lake Implementation Plan already addresses the applicable sections of the EWMP, the EWMP should summarize that section and reference the appropriate section in the Machado Lake Implementation Plan. Note that if the Machado Lake WBPCs (Category 1,2, and 3) are not addressed in the EWMP, those WBPCs will be subject to baseline requirements of the LA County MS4 Permit, including Part V.A and Part V.I.E and corresponding attachments.</p>	<p>The Machado Lake Watershed has been removed from the Beach Cities EWMP (including Appendices C, D, E, and F) and will be handled under a separate EWMP from the City of Torrance. The City of Redondo Beach, which accounts for 0.0018 percent of the Machado Lake Watershed, will address runoff within this area by implementing the minimum control measures, as discussed in the EWMP.</p>
17	Figure ES-3, ES-5, & 4-1	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>As per Figure ES-3 of the draft EWMP, 6 out of the 7 proposed BMPs will be implemented starting 2017. Clarify whether this implies that the construction of those 6 BMPs will be completed by 2017. If not, include clear completion dates for each of the BMPs.</p> <p>Likewise, as per Figure ES-5 of the draft EWMP, all proposed BMPs will be implemented starting 2020. Clarify whether this implies that the construction of these BMPs will be completed by 2020. If not, include clear completion dates for each of the BMPs.</p> <p>Additionally, clarify the same as above for Figure 4-1 of the draft EWMP.</p>	<p>Figures have been updated as requested.</p>
18	Table ES-12 and 4-2	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>For category 3 pollutants, Table ES-12 and Table 4-2 of the draft EWMP states that "As required by the Permit, monitoring for these pollutants will occur under the C/MP. If monitoring data suggest that the Beach Cities Agencies' MS4s may cause of contribute to exceedances of these pollutants in the receiving water, these contributions will be addressed through modifications to the EWMP as part of the adaptive management process, as described in Permit section VI.C.2.a.iii" This is an acceptable approach. However, the Group should consider that proposed BMPs for metals and bacteria may address category 3 pollutants (cyanide, pH, selenium, mercury, and cadmium). Therefore, Table ES-12 and Table 4-2 must list a milestone for category 3 pollutants consistent with the Harbor Toxics TMDL. As already stated in Table ES-12 and Table 4-2, CIMP data can be evaluated and modifications can be made through adaptive management.</p>	<p>The date has been changed from N/A to March 2032 in both tables and added the text, "Final: Comply with the final water quality-based effluent limitations as listed in the TMDL" to the Implementation Action column. Also, footnote 2 has been updated to reference the Category 3 pollutants.</p>
19	Table ES-12 and 4-2	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>Table ES-12 and Table 4-2 of the draft EWMP list December 2016 and December 2017 as milestones to provide documentation supporting MCM enhancements implemented over the past year to address wet weather bacteria in Dominguez Channel. Clarify whether all MCM enhancements to address bacteria in Dominguez Channel will be implemented by December 2017.</p>	<p>Added a footnote to the Tables to say, "Proposed milestones for MCM enhancement implementation are detailed in Table 2-8."</p>
20	Table ES-12 and 4-2	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>Table ES-12 and 4-2 of the draft EWMP list "Current" as a milestone for the Harbor Toxics TMDL interim metals WQBELs (wet weather) for Dominguez Channel and Torrance Lateral. Indicate with a footnote in Table ES-12 and Table 4-2 if the Group is currently in compliance with the interim WQBELs. If not, the Group shall commit to evaluating compliance through the CIMP.</p>	<p>The following footnote was added to both tables: "According to monitoring data at Dominguez Channel Mass Emission Station S28, the copper, lead, and zinc exceedance rates of the interim WQBELs are 9%, 3%, 10% respectively, based on qualified sampling events between 2002 and 2013. At the Torrance Lateral Mass Emission Station TS19, the copper, lead, and zinc exceedance rates of the interim WQBELs are 5%, 0%, and 8% respectively. These monitoring locations receive flow contributions from the Beach Cities WMG, as well as other WMGs. CIMP monitoring and subsequent adaptive management will evaluate if the Beach Cities WMG are exceeding the interim Category 1 WQBELs and evaluate compliance with the Dominguez Channel Toxics TMDL."</p>

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21	Table 2-7	Part VI.C.5.b.iv.(4). (d) (page 64)	Table 2-7 of the draft EWMP lists proposed MCM enhancements. Include milestones for the proposed MCM enhancements or indicate for each, whether the MCM enhancement is already being implemented by the Permittee(s).	Referenced table has been revised. This table is now Table 2-8.
22	Section 2.3.3 & 3.3.3	Part VI.C.5.b.ii.(1) (page 62)	In the non-stormwater sections of the EWMP, it is unclear if dry weather BMPs proposed reduce dry weather bacteria loads and/or eliminate or prevent non-stormwater discharge. For specificity, state in Section 2.3.3 and 3.3.3 of the draft EWMP that watershed control measures proposed for non-stormwater discharges meet the requirements as set forth in Parts III.A and VI.D .4.d and VI.D .10 of the LA County MS4 Permit. Additionally, propose milestones to prevent and/or eliminate all non-stormwater discharges.	Clarification has been added and milestones have been proposed.
23	Section 2.6.4, Table ES-11, & 3-12		Table ES-11 and Table 3-12 of the draft EWMP show that mainly, catch basin inlet filters will be used to achieve the target load reduction for metals and bacteria in the City of Torrance. Footnote 3 states the following: "Load reduction sum cannot be estimated at this time. The individual load reduction for each inlet filter's drainage area is shown under the "Distributed BMPs" column. Initially, 200 of 643 catch basins are planned to be retrofitted in high priority catchments. Therefore, the total load reduction from inlet filters will be evaluated in the future through monitoring, and the BMPs will be modified through the adaptive management process, with additional filters installed as necessary to meet the TLRs by the compliance deadlines." Additionally, Section 3.6.4 subsection Proposed Distributed BMPs includes a discussion on catch basin inlet filters and Appendix B provides documentation that was used for reference. Although the manufacturer's guidelines and several studies are referenced and relied on, the efficiency of these catch basin inserts to remove pollutants from the MS4 must be re-evaluated using data from the CIMP during the adaptive management process. At that time, additional structural/non-structural BMPs must be proposed as needed to achieve the target load reduction required to meet water quality objectives.	Footnote 3 has been revised to say "Load reduction sum cannot be estimated at this time. The individual load reduction for each inlet filter's drainage area is shown under the "Distributed BMPs" column. Initially, 200 of 643 catch basins are planned to be retrofitted in high priority catchments. The total load reduction from inlet filters will be evaluated in the future through CIMP monitoring, as part of the EWMP adaptive management process. At that time, the catch basin BMPs will be modified, with additional filters installed as necessary and additional structural/non-structural BMPs proposed as needed to meet the TLRs required to achieve water quality objectives by the compliance deadlines." Section 3.7.2 language has also been clarified: "Within the DC-Torrance analysis region, cumulative load reductions are dependent on the level of implementation of the planned catch basin inlet filters. At this time, inlet filters are planned for 200 of 643 catch basins in the analysis region, targeting high priority areas. Since the estimated load reduction is applicable per filter, and not to the entire analysis region, monitoring and subsequent adaptive management will be employed through CIMP monitoring to evaluate the achieved load reductions prior to each of the compliance deadlines, installing additional filters as needed or proposing additional structural/non-structural BMPs until compliance is achieved for every applicable WQBEL or RWL. At this time, the City of Torrance is not committing to any regional or distributed BMPs, aside from catch basin inlet filters and a review of green streets opportunities. "
24	Section 3.7.1	Part VI.C.5.a.iv.(2). (a) (page 62)	Section 3.7.1 of the draft EWMP shall state if watershed control measures proposed using zinc as a controlling pollutant in the Dominguez Channel watershed address not only other Category 1 pollutants, but also all Category 2 and Category 3 pollutants in Dominguez Channel.	Section 3.7.1 was revised to state the following: "Zinc was determined to be the controlling pollutant, therefore the cumulative BMP load reductions for copper, lead, and bacteria are each greater than their respective TLRs. Ammonia, cyanide, pH, selenium, mercury, and cadmium were not modeled as part of the Beach Cities' RAA; however, the implementation of the proposed BMPs is expected to achieve similarly substantive load reductions for these pollutants as for zinc. Meeting the zinc requirement required the most stringent BMP implementation, which is expected to also address all Category 1, 2, and 3 pollutants in Dominguez Channel."
25	Section 3.3.3	Part VI.C.5.b .ii.(1) (page 62)	Section 3.3.3 of the draft EWMP under Non-Stormwater Discharge Measures refers to Section 2.3.3 of the draft EWMP. However, the 7 LFDs referenced in Section 2.3.3 eliminate non-stormwater discharges in the Santa Monica Bay watershed. It is uncertain if the aforementioned LFDs eliminate non-stormwater discharge to the Dominguez Channel watershed. Therefore, include a discussion in Section 3.3.3 of the draft EWMP to elaborate on how non-stormwater discharge is addressed in the Dominguez Channel watershed.	Section 3.3.3 has been revised to discuss how non-stormwater discharges will be addressed in the Dominguez Channel Watershed.
Enhanced Watershed Management Program Provisions				

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26	Table ES-5, ES- 10, & 6-2	Part VI.C.1.g (page 49)	Table ES-5, ES-10, and 6-2 of the draft EWMP must specify with a footnote if all the listed projects were modeled in the RAA and sized to meet Water Quality Based Effluent Limits (WQBELs) and receiving water limits (RWLs).	Footnote added that states, "1 All projects listed in this table were modeled in the RAA and sized to comply with the WQBELs and RWLs in combination with other existing and proposed structural and non-structural BMPs" In Table 6-2 footnote, the note was added to clarify that within the DC-Torrance analysis region, catch basin inlet filters are assumed to achieve WQBEL/RWL compliance based on a review of literature/studies on their performance, and that TLRs from inlet filters will be evaluated in the future through CIMP monitoring.
27	Section 1.3	Part VI.C.1.g.ii (page 49)	Section 1.3 of the draft EWMP must specify if applicable if other State agency priorities are addressed (e.g.,drought response, increased capture of stormwater for beneficial use per the Recycled Water Policy, Strategic Plan priorities,California Water Action Plan priorities, etc .). If so, elaborate .	Text was added to Section 1.3 to incorporate other State agency priorities.
28		Part VI.C.1.g .vi (page 50)	The draft EWMP must state if the cost analysis done in the EWMP maximizes the effectiveness of funds through the analysis of alternatives and the selection and sequencing of actions needed to address human health and water quality related challenges and non-compliance. If so, elaborate.	Text added to section 6: "Prior to and separate from the EWMP, BMP cost effectiveness (i.e., pollutant load removed per dollar cost) were developed and evaluated by Geosyntec using SBPAT for a variety of BMP implementation scenarios. For example, it was found that regional infiltration BMPs, followed by regional flow-through treatment BMPs, followed by distributed green streets provide the greatest cost effectiveness, in part due to the economies of scale that benefit regional BMPs. Within those categories, greater BMP cost effectiveness is achieved for a given pollutant in order of the tributary land uses' EMC and runoff coefficient product (for example, for bacteria, commercial land use has a very high EMC and runoff coefficient; therefore, a given BMP type is most cost effective when placed downstream of a commercial area). This relative cost effectiveness understanding was applied by Geosyntec in identifying and prioritizing BMP implementation scenarios for agency consideration in this WMG. The most cost effective yet implementable BMPs were then sequentially incorporated into the EWMP (i.e., with the most cost effective BMPs added first) until reasonable assurance of compliance was demonstrated."
29	Section 2.6.4 & 3.6.4	Part VI.C.1.g (page 49)	Section 2.6.4 under subsection Summary of Proposed Regional BMPs states the following: "Four regional BMPs are proposed in the Santa Monica Bay Watershed portion of the Beach Cities EWMP Area. None of these projects could be feasibly sized to meet the 85th percentile design criteria." Similarly, Section 3.6.4 under subsection Summary of Proposed Regional BMPs states the following: "Two regional BMPs are proposed in the Dominguez Channel portion of the Beach Cities EWMP Area. None of these projects could befeasibly sized to meet the 85th percentile design criteria." State if the proposed regional BMPs that were modeled were sized to meet target load reductions necessary to achieve applicable water quality based effluent limitations and receiving water limitations.	The following sentence was added to Section 2.6.4 and Section 3.6.4: "However, the BMPs were sized to collectively meet the target load reductions necessary to achieve compliance with the WQBELs and RWLs, in combination with other existing and proposed structural and non-structural BMPs."
30	Section 2.8 and 3.8	Part VI.C.1.g 3.8 (page 49)	Include a discussion of the anticipated multiple benefits for each of the four regional BMPs proposed in the Santa Monica Bay Watershed and the two regional BMPs proposed in the Dominguez Channel Watershed.	Descriptions of multiple benefits have been added to the proposed regional BMPs project descriptions in section 2.6.4. Flood control was also added and groundwater recharge was revised in section 2.8.
31	Section 2.6.4	Part VI.C.4.b.iii.(S) (page 56)	Update Section 2.6.4 under Existing Regional BMPs subsection Ana lysis Region SMB-6-01 to include the project completion dates for Annie, Henrietta,and Entradero Detention Basin Enhancement projects.	These three capital improvement projects were completed in August, 2015.This date, and reference to the City of Torrance website, were added to subsection 2.6.4-- Existing Regional BMPs.

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32	Section 7	Part VI.C.1.g .ix (page SO)	<p>Section 7 of the draft EWMP inadequately addresses the Group's financial strategy . Include the following in Section 7 of 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. • 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 Managemen t Systems, etc.) • establishing a constant revenue stream for the stormwater CIP/asset management plan, which may include rate studies. 	Text has been added to Section 7, including the Group's commitment to pursue grant opportunities, the Group's estimated stormwater budgets for FY 2015-2016, and previous projects the Group has funded.
33	Executive Summary	Part VI.C.5.b.iv.(5) (page 65}	<p>The draft EWMP, in the Executive Summary under Santa Monica Bay watershed, states the following. The MS4 compliance targets for dichloro-diphenyl-trichloroethanes (DDTs) and polychlorinated biphenyls (PCBs) established in the Santa Monica Bay DDT & PCB TMDL were based on the assumption that the existing stormwater pollutant loads for DDT and PCBs were lower than what was needed to protect the Santa Monica Bay from these legacy pollutants (i.e., based on data used in the TMDL, no MS4 pollutant load reduction is expected to be required). Therefore, no reductions in DDT and PCB loading from the Beach Cities WMG MS4s are required to meet the TMDL and therefore, no Reasonable Assurance Analysis is required."</p> <p>The SMB DDTs/PCBs TMDL on page 49 states the following: "The estimates of total suspended solids (TSS) are based on LSPC model outputs for the years 2000 to 2010 based on Ackerman and Schiff 2003). Using this method the theoretical maximum allowable stormwater loads would be 506 g/yr for DDT and 154 g/yr for PCBs (Table 6-3). However, estimates of current stormwater loads are much lower. Estimates based on the median valuefrom Curren et al. {2011} extrapolated to the other watersheds based on percent urban area were 28 g/yr for DDT and 145 g/ yr for PCBs. The highest loadings werefrom Ba/Iona Creek, Hermosa Beach and Santa Monica Canyon watersheds. These three watersheds are highly urbanized and combined they represent 94% of the developed area draining to Santa Monica Bay. With the exception of PCBs from these three watersheds, all other estimates of current loading are lower than the allowable loadings."</p> <p>Therefore, the assumption that DDT requires no reduction is reasonable. However, for PCBs,an RAA must be conducted to estimate the pollutant load reduction for PCBs. Using TSS as a surrogate pollutant for PCBs is an acceptable approach for the purposes of conducting an RAA. Note that the WLA for PCBs (140.25 g/yr) applies to the entire Santa Monica Bay Watershed . The Group is subject to a percentage of the WLA relative to the percent area within the watersheds draining to Santa Monica Bay. If a pollutant load reduction is required for PCBs, additional BMPs should be proposed to address it. Please revise relevant tables and text as applicable.</p>	Executive Summary and Section 2.2.2 text has been revised to say, "The MS4 compliance targets for dichloro-diphenyl-trichloroethanes (DDTs) and polychlorinated biphenyls (PCBs) established in the Santa Monica Bay DDT & PCB TMDL were based on the assumption that the existing stormwater pollutant loads for DDT and PCBs were equal to or lower than what was needed to protect the Santa Monica Bay from these legacy pollutants (i.e., based on data used in the TMDL, no MS4 pollutant load reduction is expected to be required to demonstrate compliance with the TMDL). Therefore, it is assumed that no reductions in DDT and PCB loading from the Beach Cities WMG MS4s are required to meet the TMDL and reasonable assurance of compliance is assumed to be demonstrated without modeling. Monitoring of these pollutants will occur under the Beach Cities CIMP. Once three years of water quality data are collected, further source assessment will be considered and the categorization and prioritization of PCBs and DDT as MS4-related pollutants of concern will be reevaluated. If the CIMP monitoring data show that Beach Cities discharges are not in compliance with the TMDL, an RAA will be conducted for these pollutants and the EWMP will be revised accordingly."
34	Section 2.4		As stated in the Executive Summary and Section 2.2.2 of the draft EWMP, include a qualitative discussion on how the Group will comply with the Santa Monica Bay Nearshore and Offshore Debris TMDL (SMB Debris TMDL) in Section 2.4 of the EWMP and include references to the Trash Monitoring and Reporting Plans (TMRPs) and the Plastic Pellet Monitoring and Reporting Plans (PMRPs). Note that the TMRP and PMRPs will be implemented by reference as part of the EWMP and CIMP.	Text has been aded to the SMB Offshore/Nearshore for Debris subsection in Section 2.2.2 to discuss how the Group will comply with the Debris TMDL.

	EWMP Reference	MS4 Permit Provision	Summary of Comments and Necessary Revisions	Beach Cities Group Response
35	Section 4.1.2	Part VI.C.5.b .iv.(5). (c) (page 65)	The Harbor Toxics TMDL final compliance date for wet weather is March 23, 2032. However, Table ES-11 and Table 4-2 of the draft EWMP propose December 2032 for addressing wet weather bacteria in Dominguez Channel with footnote 1 and 2 respectively indicating that this date was selected to be consistent with the Harbor Toxics TMDL. Provide justification in Section 4.1.2 of the draft EWMP why the proposed milestone for Dominguez Channel bacteria in wet weather is 6 months after the final compliance date of the Harbor Toxics TMDL. Alternatively, change the milestone for Dominguez Channel wet weather bacteria to March 23, 2032 for consistency with the Harbors Toxics TMDL compliance dates.	Wet weather final compliance deadline was changed to March 2032 in Tables ES-12 and Table 4-2 to be consistent with Harbor Toxics TMDL. Also changed in the text in section 4.1.2.
comments on Sections 2.4 - 2.7 and 3.4 - 3.7, Reasonable Assurance Analysis (RAA) of the Enhanced Watershed Management Program (EWMP) for the Beach Cities Watershed Management Area dated June 2015.				
36	Sections 2.4 - 2.7 and 3.4 - 3.7		1. Provide a graph of the time series results, between 2001 and 2012 , of modeled runoff volumes with observed runoff volumes and a statistical analysis of the comparison of modeled and observed values for runoff volume.	Graphs have been provided with the requested data in Sections 2.4.3 and 3.4.3.
37	Sections 2.4 - 2.7 and 3.4 - 3.7		2. The model results of the baseline condition (loads are included in Table ES-4 and Table 2-6 for Santa Monica Bay Watershed; Table ES-9, Table 3-8 and Table 3-9 for Dominguez Channel Watershed) in terms of runoff volume and pollutant concentration are not provided in the EWMP report. Per the RAA Guidelines, present the model results of the baseline condition for runoff volume, pollutant concentration and pollutant loadings based on the 90th percentile critical condition at each analysis region for each pollutant of concern.	Model results for the baseline condition have been updated in the aforementioned tables to reflect the baseline runoff volume, concentration, and load for the 90th percentile critical condition (TMDL Year 1995).
38	Sections 2.4 - 2.7 and 3.4 - 3.7		3. Per the RAA Guidelines, the model results for the proposed control measures and potential BMPs should be provided to demonstrate the effectiveness of the proposed BMPs that would achieve the required pollutant load reductions and load reduction goals. However, as presented, the model results in Table 3-12 for Dominguez Channel Watershed of the EWMP report do not sufficiently demonstrate the effectiveness of the proposed BMPs. As such, the detailed reasonable assurance analysis (RAA) results for the proposed BMPs for each analysis region should be provided in terms of 1) influent volume, concentration and load; 2) treated volume, concentration and load; and 3) effluent volume, concentration and load through BMPs for the selected critical year in the EWMP report to demonstrate the effectiveness of the proposed BMPs.	Due to the robust size of the data requested, the runoff/concentration/load values have been included in the RAA data folder for each BMP condition and each analysis region. The text of the EWMP has been revised to direct readers to these data files.
39	Sections 2.4 - 2.7 and 3.4 - 3.7		4. An example illustrating the modeling results of pollutant concentrations in the receiving water for all pollutant of concern at the downstream outlet of the watershed system should be presented in the EWMP report to demonstrate the effectiveness of all BMPs in place when compared with those of the baseline condition for which all BMPs are not in place and to demonstrate the compliance with final water quality limits (WQL) under the selected critical year.	An example as requested has been included in Appendix K along with the TLR examples.