

Table 1 Comment and Response				
Plan Reference	MS4 Permit Provision	Comment and Necessary Revision	Action	Page
General				
Section 1.0	Introduction expanded.		First paragraph - new	page 1
	Second paragraph		Report changed to EWMP	page 1
Section 1.1	Regulatory Framework		New section	page 1
Section 1.2	EWMP Overview.		Section title. Section 1.3 is now Section 1.5.	page 2
Table 1.2	New Table		New table included	page 6
Table 3.6	Updated to include TPb, TZn, and bacteria. Toxics loads updated using constituent concentration from		Updated Table 3.6	page 40-41
Tables 5.4, 5.5 and 5.6	Updated to include. toxics constituent loads using constituent concentration from Machado Lake Water Sediment Toxics Data		Average toxics constituent data extracted from Machado Lake Water Sediment Toxics Data	Appendix B, page A-12
Various		Revise the document for consistent use of terms. "Catch basin filter," "catch basin," and "catch basin filter inserts" are used interchangeably.	Revised - "Catch basin filter" used consistently	whole document

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Section 1.3.2.1		Revise the first sentence of Section 1.3.2.1 to “The Machado Lake Nutrient TMDL was adopted by the LARWQCB on May 1, 2008.”	Revised under Section 1.5.2.1 Section 1.3.2.1 is now Section 1.5.2.1	page 11
Section 8.1	Part VI.C.5.c (page 66)	Correct the schedule for implementation of the toxics TMDL in Section 8.1 (p. 108). The Machado Lake Toxics TMDL only has a final compliance date, which is September 30, 2019.	Revised	page 119
Section 1.3.2.1		In Section 1.3.2.1 (p. 8), correct units of flow condition 8.45 hm ³ /yr.	Revised. Section 1.3.2.1 is now Section 1.5.2.1	page 11
Table 1.3	Attachment N Part C.2 (page N-2)	Correct Table 1.3 of the Implementation Plan to express WLAs as WQBELs consistent with Attachment N Part C.2 of the LA County MS4 Permit.	Corrected Table 1.3 now Table 1.4	page 12
Section 2.1		In Section 2.1, correct typographical error in the second paragraph from largest “faction” to largest “fraction”.	Revised	page 15
Table 3.6		Table 3.6 appears to have a typographical error under Required Reduction (g/yr) for Total PCBs: it is stated as <u>0.00</u> g/yr, with a corresponding percent reduction of 8%. Revise to correct the calculation.	Revised Table 3.6 now Table 3.7.	page 40-41
Section 1.2 of the Beach Cities EWMP		The Beach Cities revised EWMP in Section 1.2 states that “ <i>A small portion of the City of Redondo Beach is located within the Machado Lake Watershed boundary but has requested to be removed from the Machado Lake Implementation Plan</i> ”. Hence, remove the City of Redondo Beach from the Implementation Plan but acknowledge that the City of Redondo Beach’s drainage to the Machado Lake Watershed is being covered in the Beach Cities Group EWMP.	Section 1.3.3 is revised to address this issue	page 3

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Waterbody-Pollutant Classification				
Table 1.1		Revise Table 1.1 to omit rows for Dominguez Channel and Santa Monica Bay since these are covered under the Beach Cities EWMP. Revise the rest of the Implementation Plan accordingly including table titles and narrative to only focus on TMDLs for the Machado Lake Watershed.	Omitted	Page 2
Table 1.2	Part VI.C.5.a.ii (page 60)	The title for Table 1.2 should be revised as “Water Body Pollutant Combinations for Machado Lake Watershed” and the table should include categories 1, 2 and 3 pollutants. See Table 2-3 of the	Revised and it is now Table 1.3.	page 9
	Part VI.C.5.a.ii.(3) (page 60)	Ensure that E. coli, a category 3 pollutant for Machado Lake, is addressed. See comments in Enclosure 2.	Bacteria addressed.	pages 26 and 41 (Table 3.6b)
Source Assessment				
Section 3.0	Part VI.C.5.a.iii (page 60-61)	The permit requires an EWMP to identify known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters for all pollutants covered by a TMDL (‘category 1’), those identified on the 303(d) list but not yet addressed by a TMDL (‘category 2’), and those exceeding water quality standards in the receiving water where the source may be MS4 discharges (‘category 3’), based on available data, including studies. Section 3.0 discusses pollutant source characterization and prioritization; however, this characterization (Optional Study #3) only focused on nutrients and TSS as a surrogate for toxics. Also describe potential sources of other category 2 and 3 pollutants, including bacteria (for Machado and Wilmington Drain) and	Section 3 revised as commented (also see Table 3.4)	page 26 - 28

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Section 1.3.2.3	Part VI.C.5.a.iii.(1). (b) (page 61)	Add a map depicting all major outfalls and major structural controls for storm water and non-storm water that discharge to the Machado Lake watershed from the City of Torrance.	last paragraph of page 21 and Figure 3.1	Figure 3.1
Selection of Watershed Control Measures				
Section 5.3.4.1		The technology used, as stated in the Implementation Plan, is storage/infiltration for subcatchments AS2 and AS3. Clarify what portion of the water will be stored for reuse and what portion will be infiltrated for AS2 and AS3.	Clarified	page 68
Section 5.3.6	Part VI.C.1.g (page 49)	In Section 5.3.6, clarify for Baseball Field Basin that the water quality volume of 2.54 acre-feet presented in Table 5.8 for Option No. 2 represents the volume associated with the 85th percentile, 24-hour event for the Baseball Field Basin drainage area. Additionally, specify the design storm to capture.	Addressed	page 92 (Table 5.10)
Section 5.3.4.1	Part VI.C.5.b.ii.(1) (page 62)	The Implementation Plan indicates that, wherever feasible, all non-stormwater runoff will be captured and retained for Torrance Airport project. Clarify that this applies to all three Regional projects (Torrance Airport, Walnut Sump and Baseball Field).	Clarified on page 68 - one line above Section 5.3.4.2	page 68
Section 5.2.1	Part VI.C.1.g.vii (page 50)	Provide performance data for the catch basin inserts from peer-reviewed studies. The performance data should be included for all pollutants being targeted.	Provided as Appendix G	page 60

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Section 4.0, 5.0, & Table 8.2, 8.3	Part VI.C.5.a.iv.(1) (page 61) & Attachment N Parts B-D (pages N-2 to N-4)	Clarify the strategy(ies) to implement pollutant controls necessary to achieve water quality-based effluent limitations and/or receiving water limitations with compliance deadlines that have already passed, or clearly document that the deadline has been met. For example, the nutrient TMDL includes a 2014 interim deadline, while the trash TMDL has a final deadline of March 2016. For nutrients, have the interim limitations in Table 1.3 been achieved? If so, clearly state this in the Plan and provide support. If not, ensure that the schedules in Tables 8.2 (Proposed Implementation Schedule for Nonstructural Solutions) and Table 8.3 (Implementation Schedule for Structural Projects) of the Implementation Plan address past deadlines as well as future deadlines as listed in Attachment N, Parts B-D of the LA County MS4 Permit.	Interim WLS for nutrients have been achieved. Also see Section 1.5.2.1	Appendix B
Section 5.3.4.1	Part VI.C.1.g (page 49)	For the Torrance Airport Project, the Implementation Plan states that the <i>“City wants to capture and retain all non-stormwater runoff and all stormwater runoff from the 85th percentile, 24-hour storm event for the drainage area tributary to the BMP site.”</i> The Implementation Plan probably implicitly has the same approach for the entire implementation area, but should express it explicitly.	Clarified	page 67
Section 5.3.4.2, and Tables 5.4, 5.5, 5.6, 5.7, and 5.9	Part VI.C.5.b.iii.(1) (page 62)	Clarify if the 57 catch basins in subcatchment ASI will capture all of the stormwater runoff from ASI (249 acres). Regarding structural BMPs, clarify for each drainage/sub-drainage area and option whether the pollutant load reductions in Tables 5.4, 5.5, 5.6, 5.7, and 5.9 are based strictly on runoff volume reduction. If not, clearly present the source(s) of pollutant reduction/BMP effectiveness data:	Clarified Clarified	page 69 pages 69, and 83

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		<p>a. For catch basin filter inserts, provide data, if available, from peer-reviewed sources such as the International BMP database.</p> <p>b. For reductions in toxic pollutants, clarify if load reductions for toxic pollutants are directly related to load reductions of TSS (i.e., pollutant loading capacity = volume active sediment X target concentration) to demonstrate that the annual loading can be in compliance with the toxics WLAs based on toxics concentration (unit: pg/kg) through required sediment reduction. If so, provide 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.</p>	Provided as Appendix G	
		Indicate what year was used to evaluate BMP performance (e.g. Table 5.5 on p. 65, Table 5.6 on p. 66, Table 5.7 on p. 82, and Table 5.9 on p. 87), and provide justification for the year selected.	Indicated	pages 69, and 92
Section 5.3.4.2, and Tables 5.4, 5.5, 5.6, 5.7, and 5.9 (Cont.)	Part VI.C.5.b.iii.(1) (page 62)	For the Baseball Field Basin, clarify that the water quality volume of 2.54 acre-feet presented in Table 5.8 for Option No. 2 represents the volume associated with the 85th percentile, 24- hour event for the Baseball Field Basin drainage area.	Clarified	page 81

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Section 5.3.4.2 & 5.3.4.3		Section 5.3.4.2 subsection Subcatchments AS2 and AS3 states that <i>“runoff generated from subcatchments AS2 and AS3 will be treated at Site A2,”</i> but it does not specify the volume for each site. Section 5.3.4.3 states that <i>“BMP site A1 will be considered for implementation of additional storage/infiltration systems in Phase 2”</i> but it does specify how much. For subcatchments AS2 and AS3, specify volume to be captured for Phase I and Phase II, if applicable.	Volume at each site listed in Tables 5.3, and in report text	pages 67,
Section 5.3.5		For the Walnut Sump Basin, clarify in the text which option is recommended (it appears that Option 2 is recommended, but it is not explicitly stated).	Option 2 is now explicitly stated as the recommended option	page 83 (above 5.3..5.1.)
Section 5.3.6		For the Baseball Field Basin, clarify if the 19 catch basins treat all of the runoff from the sub basins. Are these catch basins that allow full capture filters, the same type used in the other two project areas (Airport and Walnut)? For the Baseball Field Basin, the Plan recommends Option 1 which, as proposed, will treat 30% of the stormwater runoff using catch basins. In light of the bacteria concerns in Machado Lake, the Regional Board highly recommends Option 2, which proposes to capture and treat all of the storm water runoff from the four subareas. Option 2 would be much more effective than Option 1 in addressing bacteria for Machado Lake.	Clarified	Page 92
	Part VI.C.5.b.iv.(1). (a) (page 63)	Specify if the minimum control measures required in the LA County MS4 Permit will be modified/enhanced. If so, provide justification. If not, please confirm that the permit provisions will be implemented as written.	See page 45	page 45

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Table 5.4, 5.5, 5.6 (page 66), 5.7, & 5.9		Tables 5.4, 5.5, 5.6 (page 66), 5.7, and 5.9 list toxics in lb/yr. Specify the individual toxic pollutants and the annual load for each.	Individual toxic pollutant load specified in Tables 5.4, 5.5, 5.6, 5.9, and 5.11	pages 68, 69,71,91, and 97,
		The Beach Cities Revised EWMP in the Executive Summary states that <i>“The Del Amo Retention Basin also has no outlet, and is sized to capture runoff from at least the 85th percentile, 24 hour storm event. Because the Del Anno Retention Basin is within the Machado Lake Watershed, this drainage area is excluded from the EWMP.”</i> Therefore, include the Del Amo Retention Basin in the revised Implementation Plan for the City of Torrance.	Addressed	page 6
Enhanced Watershed Management Program Provisions				
Section 9.0	Part VI.C.1.g.ix (page 50)	<p>While cost estimates are provided in Section 9.0 (Tables 9.1 and 9.2), a financial strategy to obtain the funds to pay for the projects in the near or long-term is missing. Where the City of Torrance has secured and/or begun to seek funding from specific sources for the projects in the Implementation Plan, provide details regarding the funding sources, requested amounts, and timing of funding, if awarded. For other projects to be implemented in the future, identify project-specific strategies for obtaining the necessary funding.</p> <p>Additionally, information on the City’s annual budget for its stormwater programs should be included. (This should have already been compiled for the FY 14-15 annual report, and can simply be reproduced in the revised Implementation Plan.) The Implementation Plan shall also describe how the selection of certain</p>	<p>Funding sources included</p> <p>page 127</p>	<p>page 125 - 127 (new section 9.3)</p> <p>page 127</p>

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		program/project options in the various sub-drainage areas, and the scheduling of those programs/projects, 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.		
Section 9.0 (Cont.)	Part VI.C.1.g.ix (page 50)	(The Beach Cities EWMP could be reviewed to determine whether some of the funding options applicable to Beach Cities as a whole could also be applicable to the City of Torrance as they address the pollution problems in Machado Lake.) Also note that section 7 of the draft Beach Cities EWMP received the following comments: 1. Include the amount and source of current monetary funds to install and implement the BMPs proposed for the milestones in the current permit cycle. 2. Include a selection and a prioritization process for obtaining funding strategies that best fits the Groups' needs (e.g. step 1: apply from X grants; step 2: apply for loans, etc.). 3. Provide a timeline to search for funding with consideration of the milestones indicated in the EWMP. 4. Articulate 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, please specify the responsibilities of those members.	Noted	
	Part VI.C.8 (pages 68-70)	Add a section to include clear steps and timeframes for the adaptive management approach.	Included	page 127 (section 9.4)

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Reasonable Assurance Analysis (RAA)				
	Part VI.C.5.b.iv.(5) (page 65)	Clarify if TSS was used a surrogate pollutant for toxics. Provide detail on, and support for, the calculation used to determine toxics removal as a fraction of suspended sediments removed by proposed stormwater treatment devices (pg.10). Finally, present the toxics data developed from the Dominguez Channel Flow Monitoring Program, which the Plan relies upon (pg.10).	Clarified and detailed in Appendix B	page 71
	Part VI.C.5.b.iv.(5) (page 65)	See Enclosure 2.	Addressed?	pages 26 and 41 (Table 3.6b)