Public Comment
Machado Lake TMDL
Deadline: 11/1/07 by 12 p.m.

CITY OF TORRANCE

PUBLIC WORKS DEPARTMENT
ROBERT BESTE
PUBLIC WORKS DIRECTOR

November 1, 2007

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Jeanine Townsend
Acting Clerk to the Board
Water Resources Control Board
1001 I Street
Sacramento, CA 95814
Fax: (916) 341-5620

Dear Ms. Townsend:

Subject: Comment Letter – Machado Lake Trash TMDL Jurisdictional Group

The Machado Lake Trash TMDL Jurisdictional Group is comprised of the following agencies: Carson, Lomita, County of Los Angeles, City of Los Angeles, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Torrance and Caltrans. The affected agencies decided to form the Machado Lake Trash TMDL Jurisdictional Group before the Trash TMDL was adopted, due to the short period of time to prepare the Trash Monitoring and Reporting Plan. The Group's comments are as follows:

- Each of the Cities has been required to prepare watershed maps pursuant to Order No. 01-182. It is apparent from review of July 11, 2007, Los Angeles Regional Water Quality Control Board staff report (staff report) that the watershed map and the corresponding Point Source Areas and Baseline Waste Load Allocations, in the staff report are not consistent with the watershed maps prepared by the Cities. It is the intent of the Group to provide an accurate watershed map and Point Source Areas with the Monitoring and Reporting Plan. It is requested that this discrepancy be noted and that values for Point Source Areas be described as tentative with direction for final maps to be provided with the Monitoring and Reporting Plan.
- There is also question about the Land Use Zoning that was applied to determine Baseline Waste Load Allocations. It is requested that this discrepancy be noted and that values for Land Use Zoning and Waste Load Allocations be described as tentative and that final watershed maps showing current Land Use Zoning and corresponding Baseline Waste Load Allocations be provided in the Monitoring and Reporting Plan.
- The staff report references a Trash TMDL Implementation Plan. The Trash TMDL Implementation Plan is not described in the Implementation Schedule section of the staff report. Please indicate if the Board would accept a joint Monitoring and Reporting Plan and TMDL Implementation Plan in a single document.

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- On page 24 of the staff report, in the paragraph defining the Full Capture Device, treatment system is to be designed based on the inches per hour data collected by Ventura County. Please modify to correspond to what has been incorporated in the LA River Trash TMDL.
- Table 5 shows 0.00 sq miles of land area for the City of Redondo Beach, however the waste load allocation shows 18.10 gallons per. Multiplying zero by the baseline equals zero. Please make the waste allocation to be zero to be consistent with the contributing land area.
- The drainage area of Redondo Beach is statistically insignificant and the nearest catch basin is approximately a mile away in the City of Torrance. Please eliminate Redondo Beach from being a responsible agency in Tables 7 and 9.
- Table 9-The full capture implementation schedule - all items other than 1 and 2 are assuming the installations of the full capture systems. There should be two separate implementation schedule tables to address the full capture vs. Trash BMP Implementation Plan approach.
- Los Angeles Harbor College (LAHC) should be added as a contributing Point Source for following reasons: LAHC is adjacent to Machado Lake, operates a golf driving range, and golf balls frequently land in the Lake; and LAHC is a considerable generator of trash during the monthly swap meet.

If you wish to discuss these issues further, please feel free to contact me at (310) 618-3059.

Sincerely,

John C. Dettle, P.E., Chair
Machado Lake Trash TMDL Jurisdictional Group

cc: Machado Lake Trash TMDL Jurisdictional Group