

Enclosure 1- Summary of Comments and Necessary Revisions to Draft EWMP Dominguez Channel Watershed Management Area Group

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Response
General			
(1) Sections 1-9		<p><u>Additional Group Members</u></p> <p>The Los Angeles Water Board received letters of intent to join the Dominguez Channel WMA Group from the City of Lawndale (August 12,2015) and the City of Carson (August 26, 2015).</p> <p>Revise the EWMP to fully incorporate any additional Group members, including revisions to the following elements:</p> <ul style="list-style-type: none"> • Evaluation of multi-benefit regional project opportunities; • Water quality characterization; • Water body-pollutant classification; • Source assessment; • Prioritization; • Selection of watershed control measures; • Reasonable Assurance Analysis; • Compliance schedules; • Legal authority. 	<p>Carson and Lawndale have been incorporated into the EWMP.</p> <p>The RAA for the DC EWMP was revised to address Regional Board comments, and the methodology is now consistent with the approach used for Carson and Lawndale.</p> <p>Additional Information for Carson and Lawndale are included in the revised addenda, provided as an attachment. The revisions to the addenda requested by the Regional Board are also addressed where appropriate within the DC EWMP.</p>

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Source Assessment			
(2) Section 2.3	Part VI.C.5.a.i ii	<p><u>Source Assessment</u></p> <p>The draft EWMP lacks a thorough source assessment section. While the Catchment Prioritization Index (CPI) is a valuable tool for identifying priority areas based on land use EMCs, additional detail must be provided in the source assessment. The Group must review available data, including but not limited to the considerations listed in Part VI.C.5.a.iii.(I)(a)(i)-(viii) of the LA County MS4 Permit.</p> <p>For clarity, the Group should provide a subsection for each pollutant or source of available data (per Part VI.C.4.a.iii.() (a)-(c) that describes source assessment findings.</p>	<p>Additional information was added to Sections 2.3 and 2.3.1. for clarity. Attachment X has also been added as requested in the comment.</p> <p>An additional element of the source assessment was added that highlights area where zinc and bacteria are likely to originate. This new analysis includes Carson and Lawndale.</p>
(3) Section 2.3.1	Part VI.C.5.a.i ii	<p><u>Catchment Priority Index</u></p> <p>Provide information on which pollutants are incorporated into the Catchment Priority Index (CPI) analysis, and how these pollutants were weighted. Additionally, reference and provide the CPI methodology, including the EMCs applied and the source(s) of the EMCs, as an attachment.</p>	
Prioritization			

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(4) Section 2.5 and Attachment E	Part VI.C.5.a.i v	<p><u>Prioritization and Compliance Schedules</u></p> <p>Further substantiate the compliance schedules for all category 2 and 3 pollutants. According to Table 2-5 and Attachment E Tables E.21 through E.26, the Group proposes a final compliance date of 2040 for all category 2 and 3 pollutants. This is not appropriate for pollutants that are of a similar class as those addressed by TMDLs in the watershed and the compliance schedules must be adjusted accordingly.</p> <p>For bacteria and any other remaining pollutants, the Group needs to provide rationale for the proposed 2040 compliance dates.</p>	<p>Section 2 and Attachment E were revised with updated schedules for category 2 and 3 pollutants, with consideration to pollutant classes. Rationale for the 2040 compliance date for bacteria was also added to Section 2.</p>
Selection of Watershed Control Measures			
(5) Section 4.1	Part VI.C.5.b.i v.(1).(a)	<p><u>Minimum Control Measures (MCMs)</u></p> <p>It is unclear if all the Group Members will implement the MCMs as listed in the permit. Clarify whether any of the Group Members intend to modify any of the MCM provisions.</p>	<p>It appears that term "enhanced MCM" caused confusion and suggested the core Permit MCMs were being modified, which is not the case. The section was revised and greatly simplified. Two types of institutional BMPs are presented in separate subsections: [1] the more intensive MCM required by the 2012 MS4 Permit (compared to the 2001 Permit) and [2] additional institutional BMPs to be implemented by the WMG.</p>
(6) Section 4.1 and Section 5.1.1	Part VI.C.5.b	<p><u>Enhanced Minimum Control Measures (MCMs)</u></p> <p>Section 4.1.2 (pg. 4-8) states that "[s]ome of the WMG agencies are implementing more aggressive or enhanced MCMs. Because of this, additional load reductions are likely to occur." However, the EWMP</p>	<p>The section has been modified and simplified. Clear milestones are provided in tables for implementing the 2012 MS4 Permit MCMs and additional institutional BMPs.</p>

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		<p>does not clearly list and describe these enhanced MCMs nor does it identify the participating Permittees. (Table 4-4 appears to address this in part, but greater clarity and specificity is needed.)</p> <p>The Group must revise Section 4 to provide additional information on the enhanced MCMs to be implemented under the EWMP. For clarity, the Group should create a sub section for each enhanced MCM and include:</p> <ul style="list-style-type: none"> • A clear description of each enhanced MCM with any relevant supporting information; • Identification of which Permittees will be implementing each enhanced MCM; • Identification of the Category 1-3 pollutants to be addressed by the enhanced MCM; • Milestones and dates for achievement of milestones for each enhanced MCM for each participating Permittee. If the Permittees do not intend to fully implement these enhancements prior to 2026 (based on Tables 5-3,5-4 and 5-7) or 2040 (based on Tables 5-5 and 5-6), interim milestones and dates for their achievement should be included. <p>Additionally, the EWMP Implementation Schedule in Section 5 must include and/or reference the milestones and timelines for each enhanced MCM/institutional control.</p>	<p>Section 5 also references these same milestones as a component of the EWMP Implementation Plan.</p>

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(7) Section 5.1.3	Part VI.C.5.b	<p><u>Green Streets Implementation</u></p> <p>Table 5-2 in Section 5.1.3 provides the implementation timeline for Green Streets. The Group must provide this schedule for each Permittee by year and by subwatershed, i.e. combine the information in Tables 4-10 and 5-2. Additionally, provide rationale for the schedule in Table 5-2, which indicates that green street implementation will not begin until 2026.</p>	<p>The schedules for green street implementation are now clearly identified for each jurisdiction in Section 5.</p> <p>Green streets are implemented based on the required reductions to achieve the milestones within the EWMP. The level of green street implementation has been reduced based on the RAA revisions.</p>
(8) Section 4.2.4	Part VI.C.5.b	<p><u>Regional Project Information</u></p> <p>Provide additional information regarding non-member Permittees within the drainage areas contributing to regional projects:</p> <ul style="list-style-type: none"> • Clarify whether subcatchments outside the Dominguez Channel EWMP Group from non-member LA County MS4 Permittees are contributing runoff to regional projects and identify these Permittees; and • Clarify whether the projects are sized to manage any of this additional volume. <p>Furthermore, include the following additional information for each regional project:</p> <ul style="list-style-type: none"> • Include the rainfall volume, and storm water runoff volume associated with each project; • In as much detail as possible, further articulate what the anticipated multi-benefits are for each 	<p>The following changes were made to Section 4.2.4 to address comments.</p> <ul style="list-style-type: none"> • Table 4-8 (formerly Table 4-12) was updated with a footnote to explain the drainage areas listed for each regional project. In summary, drainage areas for the regional projects were confined within the DC WMG area, and therefore the projects were not sized to manage any runoff from outside of the DC WMG area. Portions of drainage areas outside of the DC WMG area are assumed to be managed via other means. However, there is future opportunity to coordinate with jurisdictions outside of the DC WMG on regional projects within the DC EWMP through the adaptive management process. • Each of the Regional Project Descriptions (Section 4.2.4.1) include information requested, but the Regional Board was not able to view these figures in the draft EWMP reviewed. In the updated draft EWMP, these figures can

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		<p>project;</p> <ul style="list-style-type: none"> Identify the responsibilities of each participating Permittee for each project. 	<p>now be viewed and the additional information on rainfall volume and storm water runoff volume is provided.</p> <ul style="list-style-type: none"> The “Design Volume” originally included within Table 4-8 (formerly Table 4-12) was the equivalent of the storm water runoff volume referenced in the comment. To clarify, “Design Volume” was changed to “Design Storm Runoff Volume” in the table. Table 4-8 (formerly Table 4-12) was updated to summarize anticipated multi-benefits for each regional project. To identify responsibilities of each participating Permittee for each project, Table 4-9 was added to list the total areas and impervious areas of each participating Permittee jurisdiction within the drainage area of each regional project.
(9) Section 4.2.4.1	Part VI.C.5.b	<p><u>Regional Project Preliminary Designs</u></p> <p>A number of preliminary design concept figures did not display correctly in the copy of the draft EWMP submitted to the Los Angeles Water Board. Correct the following figures:</p> <ul style="list-style-type: none"> Ramona Park (Figure 4-8); Hawthorne Memorial Park (Figure 4-9); 	Figure issues were fixed.

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		<ul style="list-style-type: none"> • Darby Park (Figure 4-10); • Harbor City Park (Figure 4-11); and • Wilmington Recreation Center (Figure 4-13) 	
(10) Section 5.1.2	Part VI.C.5.b	<p><u>Regional Project Implementation</u></p> <p>Table 5-1 in Section 5.1.2 provides the completion schedule for the EWMP's nine regional projects. The Group must update this section so that it lists which Permittees(s) are responsible for each Regional Project by the completion date milestone.</p>	Table 5-1 was updated to list those jurisdictions responsible for each regional project.
Enhanced Watershed Management Program Provisions			
(11) Section 4.2.4	Part VI.C.1.g	<p><u>Process of Identifying and Selecting Regional Projects</u></p> <p>The Draft EWMP notes that field investigations were performed at six of the nine identified regional project sites:</p> <ul style="list-style-type: none"> • Include a timeline for when field investigations will be performed at the remaining identified regional project sites; • Update the EWMP with any relevant information if further field investigations have been performed since the submittal of the draft EWMP. 	<p>Field investigations were performed at five sites instead of six, as two investigations were performed at Chester Washington Golf Course, one on the north side and one on the south side. Section 4.2.4 was corrected to reflect this.</p> <p>All additional field investigations will be performed at the design phase of the regional projects, which is typical of project designs. Performing these investigations during the design phase is important so that design engineers inform the types of analyses and tests to be undertaken, ensuring that relevant data is collected to inform decisions that can influence designs. Additional discussion was added to Section 4.2.4 and Table 5-1 to discuss the timeline for further investigations, and the</p>

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		<p>Furthermore, clearly state in Section 4.2.4 whether any regional projects aside from the nine recommended regional projects were included in the RAA or in the EWMP's control measure implementation.</p>	<p>need to coincide with project design phases.</p> <p>No additional field investigations have been performed since the submittal of the draft EWMP.</p> <p>Based on the RAA and additions of Carson and Lawndale, additional regional projects are determined needed to meet interim and final milestones. Sections 4 and 5 were updated to discuss the additional regional projects included in the RAA.</p>
(12) Section 7.2	Part VI.C.1.g.ix	<p>Financial Strategy</p> <p>The Group's financial strategy must be revised to provide more specific information:</p> <ul style="list-style-type: none"> • The Group states that "[t]he Watershed Management Group as a whole, as well as individual members of the WMG are currently prioritizing and selecting the specific financial strategies that best fit their needs." The revised EWMP must include this prioritization and selection of specific financing strategies or, if not completed, include a schedule for completing this prioritization and selection of specific financing strategies. • The Group must update its financial strategy with any new information regarding its efforts and the challenges, potential, and feasibility of securing the potential funding sources. • The Group must specify sources of funding for regional projects and other near-term projects. 	<p>The Financial Strategy section was revised based on Regional Board comments.</p>

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		<p>If no funding is in place, the Group should identify their process for securing this funding.</p> <p>Additionally, Section 7 appears to incorrectly reference the wrong EWMP attachments for Cost Estimates (Attachment U) and Funding (Attachment V). Correct these references for clarity.</p>	
Reasonable Assurance Analysis (RAA)			
(13) Attachment F- Calibration Tables and Figures	Part VI.C.5.b. iv.(5)	<p><u>Model Calibration</u></p> <p>The Group uses "linear bias (percent)" as a measure of percent difference, however it is unclear if the linear bias numbers in Tables 5-2, 5-4, 5-6,5-8, 5-11 are percentages. Clarify these tables.</p> <p>Furthermore, although the reported linear bias numbers are relatively low, the other calibration statistics shown in Figures 5-2 through 5-8 appear to be indicative of a higher percent difference between observed and simulated values. Explain any differences in the conclusions drawn from each of the calibration statistics.</p> <p>See Enclosure 2 for additional comments on the RAA.</p>	<p>Attachment Y contains additional RAA information requested by the Regional Board.</p> <p>Within the attachment, calibration metrics are provided that directly compare to the Regional Board guidelines</p>
(14) Attachment F, Table 7-4	Part VI.C.5.b. iv.(5)	<p><u>Machado Lake Water Quality Objective</u></p> <p>Table 7-4 of Attachment F - RAA Modeling (pg. 25) uses an objective concentration of 1.04 mg/L for Phosphorus in the Machado Lake Watershed. The</p>	<p>This is a typo. The correct values are shown in Table 3-10 of the body of the report. Table 7-4 of Attachment F has been updated.</p>

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		Group must change the objective concentration to 0.1mg/L (per the TMDL) and redo the analysis, or provide rationale why this is the appropriate objective.	
(15) Section 3.3.3	Part VI.C.5.b.i v.(5)	<p><u>Baseline Simulation and Evaluation of Required Load Reductions</u></p> <p>Revise the Section 3 to address the following:</p> <ul style="list-style-type: none"> • Provide greater clarity in Section 3.3.3 regarding how baseline pollutant loading estimates were calculated and describe how this is consistent with the RAA Guidelines procedure of setting baseline pollutant loading estimates. • Describe in Section 3.3.4 how the Group's 90th percentile, 24-hour storm event constituent load approach is consistent with the RAA Guidelines method for estimating required pollutant reductions. 	<p>The RAA section was revised to be consistent with the approach used for Carson and Lawndale. The exact same baseline model was used in the revised EWMP (no changes to baseline model). The RAA changes were mostly the BMP modeling; SUSTAIN was applied in a manner that is very similar to the RAAs for Upper LA River, Ballona Creek, Upper San Gabriel River, and Upper Santa Clara River.</p> <p>Note, however, the critical condition for the DC EWMP, was maintained – based on the storm that produces the 90th percentile loading. The Exceedance Volume approach was <i>not</i> used for the DC EWMP.</p>
(16) Section 3.3.S	Part VI.C.5.b. iv.(5)	<p><u>Selection of Limiting Pollutants</u></p> <p>Machado Lake - The Group selected bacteria rather than zinc or total nitrogen as the limiting pollutant for Machado Lake. Section 3.3.5 notes that the discharge of highly treated recycled water into the lake to offset evapotranspiration "will dilute the stormwater stored in the lake and lower the concentration of all pollutants, including nutrients and toxics." The Group must provide calculations and further analysis to demonstrate the data-driven assumptions of this</p>	<p>The language regarding the limiting pollutant analysis was revised in Section 3.4.2 (formerly 3.3.5). The BMP modeling to address the limiting pollutants was also revised to be consistent with approaches used for Carson and Lawndale. The RAA now addresses bacteria in all watersheds areas. In addition, zinc is addressed in all watersheds except Machado Lake and Wilmington Drain (because zinc is not a Water Quality Priority in those watersheds). Additional discussion was</p>

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		<p>approach.</p> <p>Zinc in Machado Lake and Wilmington Drain - The Group also notes that it did not select zinc as the limiting pollutant for Machado Lake or Wilmington Drain because the EWMP does not identify zinc as a Category 1-3 Water Body-Pollutant Combination for these subwatersheds. To proceed with this approach, the Group must explicitly commit to reevaluating this decision as it collects monitoring data.</p>	<p>added to Section 3.4.2 to discuss the benefits of in-lake BMPs to reduce nutrient concentrations based on previous modeling efforts performed on the lake.</p> <p>Language was added the limiting pollutant analysis section that commits to re-evaluate the limiting pollutant analysis based on CIMP monitoring data.</p>
(17) Section 5.2	Part VI.C.5.b.i v.(5)	<p><u>RAA of Control Measure Implementation Schedule</u></p> <p>In addition to the load reduction tables contained in Section 5.2, provide additional information regarding the volumes of stormwater that control measures will retain and/or treat (this additional information can be referenced and included as an attachment):</p> <ul style="list-style-type: none"> • Present the load reduction information included in Tables 5-3 through 5-7 in terms of BMP volume capacity and/or volume reductions; • Present the above information for each of the five subwatersheds by Permittee (i.e. split up the information contained in Tables 5-3 through 5-7 so that for each subwatershed, each contributing Permittee has a table of control measure implementation); • Clearly indicate the target volume that needs to be addressed based on the RAA for each subwatershed and for each compliance date. 	<p>The revised EWMP Implementation Plan now clearly identifies both the BMP capacities and volume reductions to be achieved by each jurisdiction for each of its receiving waters for each milestone.</p>

Enclosure 2 - Summary of Comments and Necessary Revisions for the Reasonable Assurance Analysis (RAA) Dominguez Channel Watershed Management Group Enhanced Watershed Management Program (EWMP)

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Response
1.		<p>In addition to linear bias statistics presented in Table 5-2, provide additional explanation and interpretation of the root mean square and coefficient of correlation statistics in Table 5-2, Table 5-4, Table 5-6, Table 5-8, and Table 5-11 of the Attachment F, RAA Modeling, and any differences in the conclusions that can be drawn regarding the hydrology and water quality calibrations based on the three statistics. Further, data needed to improve model calibration for these constituents should be identified along with a commitment to collect the necessary data.</p>	<p>Attachment Y contains additional information on the calibration including comparison to RAA Guidelines.</p>
2.		<p>The model results of the baseline critical condition in terms of runoff volume, pollutant concentration and pollutant loading are provided in Table 3-7 through Table 3-11 of the EWMP. However, the intermediate processes to arrive at the modeled values of runoff volume, pollutant concentration, and pollutant loading are identifiable. As such, the duration curves or frequency curves of runoff volume, pollutant concentration and pollutant loading for baseline condition in each analysis region for each pollutant of concern should be presented in the EWMP or an appendix.</p>	<p>The RAA was revised and is now consistent with other RAAs in the region. The modeling approach should now be more clear.</p>
3.		<p>The estimated allowable loads appear to be presented in Tables 7-1 to 7-5. Also present the required load reductions for each subwatershed area. Demonstrate that the estimated allowable loads and load reductions</p>	<p>The baseline and allowable loads and percent reductions are now provided in Section 3, and pre-and post-BMP effectiveness is provided in Attachment Y.</p>

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		<p>are obtained from the 90th percentile critical condition of runoff volume and allowable pollutant concentration. It is recommended that the allowable loads and required load reductions are presented in the same duration curves for baseline condition to demonstrate that the estimated allowable loads and load reductions meet the 90th percentile critical condition.</p>	
4.		<p>In the report, summary statistics of load reduction and percent reduction for different control measures is provided as shown in Table 5-3 through Table 5-7, however, some of the values used to arrive at the modeled values of load reduction and the percentage of the final target are not clearly identifiable. Provide the RAA results for the proposed control measures and potential BMPs to demonstrate the effectiveness of the proposed BMPs that would achieve the required pollutant load reductions and load reduction goals in terms of 1) influent volume, concentration and load; 2) treated volume, concentration and load; and 3) effluent volume, concentration and load through the system of BMPs at the downstream point of BMP systems to demonstrate the effectiveness of the proposed BMPs.</p>	<p>The baseline and allowable loads and percent reductions are now provided in Section 3, and pre-and post-BMP effectiveness is provided in Attachment Y.</p>
5.		<p>Finally, please provide an example validation for a representative water body within the Dominguez Channel Watershed Management Area , or in another EWMP area where the same RAA approach is used, that demonstrates that with all proposed BMPs in place, as determined from the initial analysis of the necessary volume and/or pollutant load reduction, will</p>	<p>An example validation is provided in Attachment Y.</p>

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		result in achieving the RWLs.	

Review of Addenda to the Draft EWMP for the DC WMG.

Enclosure 1 - Summary of Comments and Necessary Revisions to Draft EWMP based on the City of Carson Addendum

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Response
(1) Section 2	Part VI.C.S	<p><u>Water Quality Priorities within Los Angeles River Watershed</u></p> <p>In its discussion of water quality priorities, Section 2 (pg. 4) references the analysis of the Dominguez Channel Watershed Management Area included in the Dominguez Channel EWMP and states that "[t]he inclusion of Carson does not necessitate any additional Water Quality Priorities (TMDLs, 303(d) listings, or otherwise)."</p> <p>However, this discussion does not address the portion of the City of Carson within the Los Angeles River watershed. The revised, EWMP's section on water quality priorities (including the subsections on water quality characterization, water body pollutant classification, source assessment, and prioritization) must address this portion of the City of Carson.</p>	The WQPs for Compton Creek and LA River Reach 1 were added to Section 2 of the EWMP, based on the WQPs identified by the ULAR EWMP.

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Response
(2) Section 2	Part VI.C.S.a.iii	<p><u>Source Assessment</u></p> <p>The revised EWMP's source assessment must consider additional pertinent information (if any) now available with the inclusion of the City of Carson-e.g. findings from the City's Illicit Connections and Illicit Discharge Elimination Program and other MS4 permit programs; findings from the City's Machado Lake Nutrient TMDL Source Identification Study and other similar TMDL studies; locations of the City's MS4s, major outfalls, and major structural controls; etc.</p> <p>A list of information to be considered in the source assessment is outlined in Section VI.C.S.a.iii of the LA County MS4 Permit.</p>	<p>A review of available data was conducted, but none of the available data were useful to the source assessment. Instead of using monitoring data, modeling was used to support the source assessment. The results are added to Section 2, and were implicitly considered within the RAA for development of the EWMP Implementation Plan.</p>
(3) Section 3.1.3 and Table 5-5	Part VI.C.5.b	<p><u>Information on Regional Projects</u></p> <p>Section 3.1.1 (pg. 6) identifies two regional projects to address runoff from the City of Carson. The Group must include additional information on these identified projects:</p> <ul style="list-style-type: none"> • Provide milestones and timelines for each project; • Include the rainfall depth (in inches), rainfall volume, and storm water runoff volume associated with each project; • In as much detail as possible, further articulate what the anticipated multi-benefits are for each project; • Clarify which projects can be designed to 	<p>As Carson was integrated within the EWMP document, Carson projects and associated milestones and timelines were incorporated within Table 5.1 of the EWMP.</p> <p>Rainfall depths for each project were incorporated within Table 3-2 of the EWMP Addenda (Attachment Z of the EWMP). The rainfall runoff volumes associated with each project were added (with all other regional projects) to Table 4-8 (formerly Table 4-12) of the EWMP.</p> <p>Anticipated multi-benefits of Carson regional projects were incorporated within Table 4-8 (formerly Table 4-12) of the EWMP.</p> <p>All Carson regional projects are designed to retain the 85th percentile, 24-hour storm event. Additional clarification was added to Section 4.2.4 for all regional</p>

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		retain the 85th percentile, 24-hour storm event.	projects included in the EWMP.
(4) Section 3.1.3 and Table 5-5	Part VI.C.5.b	<p><u>Additional Regional Projects L Regional Projects on Private Parcels</u></p> <p>The EWMP IIT1plementation Plan included in Table 5-5 (pg. 34) indicates that 100.3 acre-feet of BMP capacity should be implemented through "Additional Regional BMPs." This is roughly half of the 202.9 acre-feet of BMP capacity called for in the EWMP Implementation Plan.</p> <p>The Group needs to elaborate on the feasibility of its strategy and detail its process for implementing these BMPs. In particular, the Group must clarify if it already has a list of potential regional project sites identified from the regional project screening process explained in Section 3.1 (pg. 5) or if there is a lack of publicly owned land for these projects.</p> <p>The Group must also explicitly state any difficulties or issues that may be faced with this strategy and should identify potential alternative approaches that it can pursue.</p>	Additional BMPs are discussed in Section 4.2.7.
(5) Section 3	Part VI.C.5.b.iv.(3)	<p><u>Los Angeles River TMDLs Machado Lake Trash TMDL</u></p> <p>Indicate whether a Load Reduction Strategy will be pursued by the City of Carson for the Los Angeles River Bacteria TMDL.</p> <p>Furthermore, include the Group's strategy to implement pollutant controls necessary to achieve</p>	<p>Carson is still evaluating where to pursue LRSs for Segment A and Compton Creek. Those LRSs would not be due until later in 2016 and 2017, respectively.</p> <p>The milestones for additional institutional BMPs identified in Section 5 are applicable to the LA River and Machado Lake Trash TMDLs.</p>

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		water quality-based effluent limitations for the Los Angeles River and Machado Lake Trash TMDLs.	
(6) Section 4	Part VI.C.5.b.iv.(5)	<p><u>Reasonable Assurance Analysis</u></p> <p>Provide the model files for the RAA analysis for the City of Carson.</p> <p>Additionally, for clarity, provide further detail in Section 4 on the Upper Los Angeles River EWMP Group's limiting pollutant analysis and its applicability to the City of Carson.</p>	Model files will be provided.
(8) Section 7	Part VI.C.I.g.ix	<p><u>Financial Strategy</u></p> <p>In the revised EWMP, include information on the existing stormwater costs for the City of Carson. This information was previously provided for the Group's other member agencies in Table 7-13 of the draft EWMP.</p>	Table 7-13 of the EWMP was updated to include information from the City of Carson.
(9) None	Part VI.C.S.b.iv.(6)	<p><u>Legal Authority</u></p> <p>In the revised EWMP, include a certified statement that the City of Carson has the necessary legal authority to implement the Watershed Control Measures identified in the EWMP and EWMP Addendum, or that other legal authority exists to compel implementation of the Watershed Control Measures.</p>	A certified statement of legal authority for City of Carson was added to Attachment W.

Enclosure 2 - Summary of Comments and Necessary Revisions to Draft EWMP based on the City of Lawndale Addendum

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Response
(1) Section 2	Part VI.C.S.a.iii	<p><u>Source Assessment</u></p> <p>The revised EWMP's source assessment must consider additional pertinent information (if any) now available with the inclusion of the City of Lawndale-e.g. findings from the City's Illicit Connections and Illicit Discharge Elimination Program and other MS4 permit programs; findings from any source investigations; locations of the City's MS4s, major outfalls, and major structural controls; etc.</p> <p>A list of information to be considered in the source assessment is outlined in Section VI.C.S.a.iii of the LA County MS4 Permit.</p>	<p>A review of available data was conducted, but none of the available data were useful to the source assessment. Instead of using monitoring data, modeling was used to support the source assessment. The results are added to Section 2, and were implicitly considered within the RAA for development of the EWMP Implementation Plan.</p>
(2) Section 3.1.3	Part VI.C.5.b	<p><u>Information on Regional Projects</u></p> <p>Section 3.1.1 identifies three regional projects to address runoff from the City of Lawndale. The Group must include additional information on these listed projects:</p> <ul style="list-style-type: none"> • Provide milestones and timelines for each project; • Include the rainfall depth (in inches), rainfall volume, and storm water runoff volume associated with each project; • In as much detail as possible, further articulate what the anticipated multi-benefits are for each project; • Clarify if these projects can be designed to retain the 85th percentile, 24-hour 	<p>Through integration of Lawndale into the DC WMG, the RAA for the DC EWMP was revisited to incorporate the regional projects included by Lawndale. After further evaluation, it was determined that the Alondra Park regional project could be modified to additionally manage runoff from El Segunda, Hawthorne, and Los Angeles County, allowing for a cost-share and resizing of the project the eliminated the need for the other two regional projects (Redevelopment Authority Empty Lot and William Anderson Elementary/Will Rogers Middle School) originally included within the Addenda for Lawndale. As a result, the Addenda (Attachment AA of the DC EWMP) now only includes Alondra Park. As Lawndale was integrated within the EWMP document, the Alondra Park regional project and associated milestones and timelines were incorporated within Table 5.1 of the EWMP.</p> <p>The rainfall depth for the Alondra Park regional project</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Response
		<p>storm event.</p>	<p>was incorporated within Table 3-2 of the EWMP Addenda (Attachment AA of the EWMP). The rainfall runoff volume associated with the project were added (with all other regional projects) to Table 4-8 (formerly Table 4-12) of the EWMP.</p> <p>Anticipated multi-benefits of the Alondra Park regional project were incorporated within Table 4-8 (formerly Table 4-12) of the EWMP.</p> <p>The Alondra Park regional project is designed to retain a stormwater volume less than the 85th percentile, 24-hour storm event. Additional clarification was added to Section 4.2.4 for all regional projects included in the EWMP.</p>
(3) Section 4	Part VI.C.5.b.iv.(5)	<p><u>Reasonable Assurance Analysis</u></p> <p>Provide the model files for the RAA analysis for the City of Lawndale.</p>	<p>Model files will be provided.</p>
(4) Table 4-2	Part VI.C.S.b.iv.(5)	<p><u>RAA- Load Reduction</u></p> <p>Section 4.3 and Table 4-2 note that an 86% zinc load reduction is required. However, calculating the required load reduction using values provided in Table 4-2, appears to give an 88% load reduction:</p> $1 - \frac{\text{Allowable load during 90th percentile}}{\text{Loading during 90th percentile}} = [1 - \frac{76.0 \text{ lbs}}{625.7 \text{ lbs}}] = 87.9\%$ <p>Clarify these load reduction numbers and any related sections of the EWMP.</p>	<p>The load reduction was corrected and updates were made to results integrated within the EWMP (Table 3.3) and Addenda (Attachment AA).</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Response
(5) Section 7	Part VI.C.I.g.ix	<u>Financial Strategy</u> In the revised EWMP, include information on the existing stormwater costs for the City of Lawndale. This information was previously provided for the Group's other member agencies in Table 7-13 of the draft EWMP.	Table 7-13 of the EWMP was updated to include information from the City of Lawndale.
(9) None	Part VI.C.S.b.iv.(6)	<u>Legal Authority</u> In the revised EWMP, include a certified statement that the City of Lawndale has the necessary legal authority to implement the Watershed Control Measures identified in the EWMP and EWMP Addendum, or that other legal authority exists to compel implementation of the Watershed Control Measures.	A certified statement of legal authority for City of Lawndale was added to Attachment W.