Reference Number	EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision	Revision Adequacy	Response or Discussion	Responsibility
8	EWMP, Appendix A, Section 4.3, page 59		Regarding debris, the XXX should be replaced with actual numbers of catch basins.	XXX's were removed. Are number of catch basins not known (because they are not given)? If catch basin number is not known when will the group schedule a date by which all catch basins will have been identified?	Number of catch basins has been added to Section 5.5.1	Group
9	EWMP, page 7	NA	Regarding page 7 of the EWMP, the first and second paragraphs discuss the compliance deadlines associated with the Trash and Bacteria TMDLs. Reference or provide these dates and specify whether the dry weather bacteria TMDL compliance dates are for summer or winter. Table 2-3 should also be referenced for completeness. In addition, eliminate redundancy in paragraphs 1 and 2 regarding the discussion of final compliance. Additionally, correct the title of Table 1-3.	Specify whether the dry weather bacteria TMDL compliance dates are for summer or winter.	A sentence on page 7 has been updated to read as follows (additional text in red): "The final compliance deadline for Bacteria TMDL WQBELs and RWLs has already passed for summer dry weather and winter dry weather and will be effective July 15, 2021 for wet weather." Table 2-3 specifies both the summer dry weather and winter dry weather compliance dates.	Geosyntec
			Water Quality Characterization			
11	EWMP, Pages 14-16	Part VI.C.5.a.i.	The EWMP provides some information on the sources of bacteria, PCBs & DDTs, and lead, and the relative contribution of these sources, but the EWMP does not provide any numeric information in terms of loading or concentration data. Where data or studies are cited and contain loading or concentration data, a summary of the data must be provided.	Are there any available studies from which loading or concentration data can be included into the EWMP to improve the characterization of the water quality? Please confirm that of the studies that you refer to there was not any numeric data, beyond what was provided? Only relative magnitude of concentrations was contained?	A new section (Section 2.2) has been added to summarize historical monitoring data. In addition, Section 2.4 has been updated, where deemed appropriate, with concentration data from relevant reports.	Geo
			Source Assessment			
15	EWMP, Page 16	Part VI.C.5.a.iii .(1)(a)(v)	Lead must continue to be monitored under the CIMP to assess whether it is meeting WQBELs. While lead is a Category 2 pollutant in Santa Monica Canyon Channel and it was determined through an RAA calculation to require a TLR of 0, it is a metal that is characteristically derived from urban watersheds. Reference the TMDL for Metals in Ballona Creek and the following findings which may be applicable to the SMB J2&J3 EWMP area: 1. During wet weather, runoff from industrial sites has the potential to contribute metals loadings to the creek. This finding is supported by Stenstrom et al. in their final report on the industrial storm water monitoring program under the existing genera l permit. The report found that the mean value for lead	Please list page number for reference(s) for lead.	Section 2.4.3 (page 23); Section 6.1 (page 88)	Geo

			was 2960 ug/L (Stenstrom et al., 2005). 2. The most prevalent metals in urban stormwater are consistently associated with suspended solids (Sansa lone and Buchberger 1997, Davis et al. 2001). These metals are typically associated with fine particles in storm water runoff (Characklis and Wiesner 1997, Liebens 2001), and have the potential to accumulate in estuarine sediment posing a risk of toxicity (Williamson and Morrisey {2000). 3. During 1991-1996 92% of lead annual watershed loads came from wet-weather runoff. (Ballona Creek Metals TMDL, pages 27-28)			
			Selection of Watershed Control Measures			
17	EWMP, page 30	Part VI.C.5.b	Clarify the relationship between Section 4.1 and Appendix F, Section 6 and reference Appendix F, Section 6 as appropriate in the main body of the EWMP. In addition, clarify whether the bulleted items on pages 33-34 of Appendix F of the EWMP are meant to summarize the MCMs required until the EWMP is approved (2001 MCMs) or the MCMs required after the EWMP is approved (2012 MCMs). If the former, add a parallel bulleted list that summarizes the additional MCM elements that will be implemented after EWMP approval.	Please provide the page number in Appendix F where the additional MCM elements are listed that will be added.	Appendix pages F-33 through F-36 outline the additional MCM elements to be added.	MWH
19	Various	Part VI.C.5.b.iv .(4)(e)	Ensure that the plan clearly identifies the responsibilities of each participating permittee for each watershed control measure, including non-structural BMPs (e.g., programmatic, institutional, source control, etc.)	There was no reply or modification to the EWMP with respect to this comment.	Additional language regarding implementation of MCMs and non-structural control measures has been added to Section 4.1. Lead agencies for Regional and Centralized BMPs required for compliance are identified in Table 4-6. A summary of planned/proposed regional projects and green street area by lead agency is presented in Table 4-7.	Group
20	EWMP, Appendix A, page 17	Part VI.C.5.b.iv .(5)(c)	Show work for deriving the modeled 90th percentile daily concentration of 21 ug/L for lead.	A footnote was added that describes that the derivation for the 90th percentile daily concentration of lead is contained in electronic data files that were provided. Please also add that they are in electronic format because the data consists of 10,000 monte carlo daily storm simulations.	The footnote has been updated to read as follows (additional text in red): “The data used to determine the annual runoff and the 90th percentile daily lead concentration in the 90th percentile critical year consists of over 10,000 Monte Carlo simulations. Due to the size of this data file, it can be found in the electronic data files submitted to the Regional Board along with the J2/J3 SMB EWMP.”	Geo
			Enhanced Watershed Management Program Provisions			
23	EWMP, page 20, EWMP, Appendix A, page 4	Part VI.C.1.g.iv , page 49	As the RAA approach for dry weather relies on a demonstration of certain conditions at CMLs and their drainage areas, such as "there no MS4 outfalls owned by the SMB EWMP Group agencies within the CML's drainage area" and "there are no non-stormwater MS4 outfall discharges within the CML's drainage area," substantiate these findings for each CML with a map of the drainage areas associated with each CML that includes all MS4 outfalls (major and minor) and observations conducted at CMLs and MS4 outfalls.	Please point me to exact location of modification.	The text in Section 3.2.1 of the EWMP and Sections 2.2 and 4.5 of EWMP Appendix A has been modified as a result of the original comment. As shown in Table 15 of Appendix A, only one subwatershed (SMB 2-14) relies on the absence of an outfall to demonstrate	Geo

					reasonable assurance of compliance. Figure 23 was added to Appendix A to show this subwatershed and its drainage infrastructure. Since no other subwatersheds relied on this rationale to demonstrate reasonable assurance of compliance, no other figures were created. In addition, no subwatershed relied on non-stormwater screening results to demonstrate compliance. However, non-stormwater screening at SMB 2-15 was conducted on Feb 10, 2014. This screening confirmed that the LFD, located upstream of the Chevron Facility, was working effectively.	
25	EWMP, Appendix F, page 29	Part VI.C.1.g.vi, page 50	Table 5-1- Regional Project Evaluation Criteria, in a memo entitled "Existing and Potential Control Measures Technical Memorandum" provides different criteria for consideration in evaluating the Regional projects to propose. Criteria include: cost effectiveness (capital cost, funding options), stormwater capture goals (water quality, volume of water captured), environmental, public policy institutional issues (political constraints, partnerships), land ownership (public vs. private), ease of implementation (permitting, constructability). Provide ranking of potential regional projects, including those proposed in the EWMP and others that were evaluated but not selected for inclusion in the EWMP, if any, per these evaluation criteria.	Additional text added to section 4.2.3 is helpful. However, it would be helpful to add a reference to Appendix F, Table 5-1?	Reference to Table 5-1 in Appendix F has been added to Section 4.2.3	MWH
27	EWMP, pages 79-80	Part VI.C.1.g.ix, page 50	Document existing sources of funding more precisely at the Permittee level (see Table 7-4). Include data/information for El Segundo, which is currently missing from Table 7-4. In addition, clarify the column "Existing Utility" in Table 7-4	I don't see where additional information has been added for El Segundo in Table 7-4. Please provide if available. Also, please define "Existing Utility."	Funding source for City of El Segundo and Description of Cost in Table 7-4. "Existing Utility" refers to an agency's existing, dedicated fee in place that funds (at least in part) their stormwater program. This definition has been added as a footnote to Table 7-4.	Group
28	EWMP, Section 7.1		Provide documentation on how centralized and distributed projects will be integrated into or aligned with, existing CIPs for each Permittee. Indicate whether this alignment could off-set capital costs (such as for green streets) and, if so, by how much.	There is a new section called "Clean Water State Revolving Fund" that has a discussion of how the City of Los Angeles has a 5-year Capital Improvement Plan (CIP) that contains a full range of storm water projects. Do you have a way to quantify the offset of the capital costs (e.g. for green streets) by the capital improvement plan?	Additional language has been added to the "Clean Water State Revolving Fund" subsection of Section 7.3.1 Potential Funding Sources	Group

29	EWMP, Section 7.4.4		Provide timeframe(s) for developing a more detail financial plan to implement the EWMP.	Please direct me to location of revisions.	Section 7.3 was updated to describe the financial strategy in more detail. Additional grant options and agencies pursuing grant funding has been added. Tables 7-5 through 7-9 were added to aid in identifying potential sources, timeline, and feasibility.	LASAN
30	EWMP, Table 4-6	Part VI.C.4.b.iii .(5),page 56	Clarify the completion date for RBMP10_PenmarPh2 and define the "*" associated with this project in Table 4-6	The * is still not defined though there is now a footnote of 2 next to it that is defined. Does the * have another meaning? Is the project completion date 2018, the Interim Compliance date?	The "*" for RBMP10_PenmarPh2 is defined as follows: The incremental load reduction between Penmar Phase I (existing) and Penmar Phase II (planned) is negligible. Therefore, the full load reduction applicable to Penmar Phase II has been applied to the interim compliance deadline/target. As a result, the interim compliance date is indicated as 2018 however the project completion date is 2021 (as indicated in Section 3.5.9)	MWH
			Reasonable Assurance Analysis (RAA)			
35	Appendix F, Table 15, footnote **		Fill in dates of observations in table note"**".	Date for all dry weather samples/observations is not very clear. Text says, "Observations made during the dry weather screening on February 10, 2014 also confirmed that no dry weather flows were present at the outfall." The footnote is only for SMB 2-15. Was this the observation date for all the other locations?	As shown in Table 15 of Appendix A, no subwatershed relied on non-stormwater screening results to demonstrate compliance. However, non-stormwater screening at SMB 2-15 was conducted on Feb 10, 2014 and Feb 13, 2014. This screening confirmed that the LFD, located upstream of the Chevron Facility, was working effectively.	Geo
			Supplemental Questions (per email on March 29th, 2016)			
1	EWMP, Page 27		Could you have someone footnote page 27 of the Revised SMB J2/J3 EWMP specifying the source of the redevelopment rates? It just says, "Assumed rates were based on redevelopment data collected in the Los Angeles region."		Reference was added to the Ballona Creek TMDL Implementation Plan in Section 3.3.4 of the EWMP and Section 3.3.2 of EWMP Appendix A. This reference was added to the Reference section in each document as well.	
2	EWMP		Could you find a way to address (in actions or with explanation if there is a reasonable one) the possible		The following footnote has been	

			intermingling of privately owned storm water infrastructure within the full MS4 system within SMB J2/J3?		added to Section 2.3.2 (Spatial Domain) of Appendix A: "The RAA was conducted based on land uses, including private property within the SMB J23 EWMP Area. As a result, the EWMP inherently addresses runoff from private property that enters the SMB J23 EWMP Group's MS4."	
3	EWMP		Could you find a way to address (in actions or with explanation if there is a reasonable one) the possible intermingling of privately owned storm water infrastructure within the full MS4 system within SMB J2/J3?		Correct – catch basin inserts are not used for pollutant load reduction with the exception of trash/debris ("full capture devices" for compliance with the trash TMDL).	