

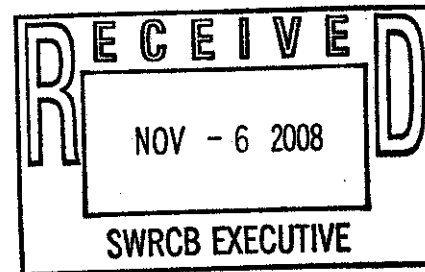
Public Comment  
Machado Lake Nutrients TMDL  
Deadline: 11/7/08 by 12 noon



# CITY OF TORRANCE

PUBLIC WORKS DEPARTMENT  
ROBERT BESTE  
PUBLIC WORKS DIRECTOR

November 5, 2008



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

Subject: MACHADO LAKE TMDL JURISDICTIONAL GROUP  
COMMENT LETTER

Dear Ms. Townsend,

The Machado Lake Total Maximum Daily Load (TMDL) Jurisdictional Group is composed 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 TMDL Jurisdictional Group in order to coordinate review and implementation of TMDLs for Machado Lake. **This letter does not reflect the comments of the City of Los Angeles or the County of Los Angeles.** They will send separate comment letters. The remaining group's comments are as follows:

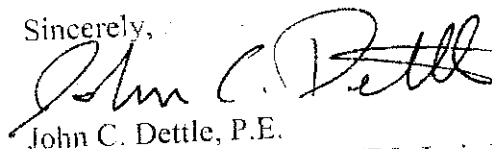
1. Attainment of the narrative objectives should be the focus of the reconsideration of the TMDL at 7.5 years from the effective date. The numeric targets necessary to achieve the narrative objectives should be reevaluated in light of water quality monitoring and special studies as well as source reduction projects which have been implemented by the responsible agencies. Accordingly, the final sentence in Table-29.1 should be modified to focus the reconsideration on the attainment of the narrative objectives.
2. If the MS4 Permittees choose to comply with waste load allocations by actively participating in a LWQMP and attaining the TMDL waste load allocations measured in the lake through a regional alum treatment system, it is unclear how that participation is to be documented—are the MS4 Permittees to become party to the MOA or Clean Up and Abatement Order between the City of LA and the Regional Board, or are such MS4 Permittees to submit a separate Implementation Plan to the Regional Board stating their intention to participate and the means by which WLAs will be achieved? This needs to be clarified in Table 7-29.2 of the Basin Plan Amendment. Such documentation/approval of implementation plans will also provide the opportunity for the responsible parties to propose and obtain Regional Board Executive Officer approval of a design storm

criterion prior to the commissioning of design plans and specifications for regional treatment systems.

3. Table 7-29.1 under Implementation Plan, II. Implementation and Determination of Compliance with WLAs states that responsible parties may comply with interim WLAs through implementation of external nutrient source reduction projects in accordance with the TMDL Implementation Plan approved by the Regional Board Executive Officer; however there is no provision in Table 7-29.2 for submittal and approval of an Implementation Plan for achieving the Interim Objectives for WLA by MS4 Permittees who intend to comply with the final WLA at the lake by participating in the LWQMP and a regional treatment solution jointly with other MS4 Permittees. Presumably these MS4 Permittees must also implement interim projects to meet the 5-year interim nitrogen objective as it is unrealistic to assume that the regional treatment system could be in place within 5 years of the effective date. The method for obtaining Regional Board Executive Officer approval of such a means of compliance needs to be clarified.
4. The TMDL should also account for historic nutrient loading and allow exceedences during dredging operations to remove that historic nutrient loading.
5. Wet Weather season corresponds to a period of no or little algae growth, and dry season corresponds to the time of substantial algae growth. However, this TMDL makes no adjustment for seasonal variations or rain events. A large storm has the effect of churning up nutrient rich sediments in the bottom of the lake while at the same time flushing those nutrients from the lake. The proposed TMDL should include an exemption for a period of time following rain events, or allow for and higher Waste Load Allocations in the lake after rain events, to give time for the lake water to reach equilibrium. This proposed seasonal variation would prevent Notices of Violations from being issued that are caused by rain events that actually improve overall water quality and at a time when there is no algae growth.

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 TMDL Jurisdictional Group

cc: Machado Lake TML Jurisdictional Group