

**Draft Table of Comments and Responses (as of 11/29/2005 CREST Meeting)
Ballona Creek Bacteria TMDL
Implementation Plan Technical Memorandum**

EPA Comments	
Comment	Response
Somewhere in the document we should have a paragraph describing what the NOTF is and figure which shows where it is relative to the listed reaches and tributaries.	Description of NOTF inserted
Strategy descriptions need to follow Options listed	Reworked strategy descriptions.
Descriptions of Strategies confusing and repetitive; remove monitoring implications; combine assumptions	Descriptions reworked to clarify; assumptions for both Preferred and Alternative Strategies combined; monitoring implications sections removed.
Table of dry weather flows would be useful.	Table for each strategy added.
Confusion between subwatersheds vs. tributaries and what flows go to NOTF.	Changed text to use subwatershed names, with additional figure to clarify relationship between subwatersheds and tributary names.
Suggest putting in a sentence or two which summarizes the basic difference between the preferred and the alternate strategy. (I.E. the alternate strategy envisions diversion and treatment of all dry-weather flows and some portion of the wet-weather flows. The alternative strategy envisions the construction of three new treatment plants.)	Text added.
Unclear why this cost is less than preferred strategy. Under the preferred strategy the unit cost for dry weather diversions are \$7.39. Is the assumption here that all dry-weather gets sent to the treatment plants?	Unit costs similar for both strategies therefore, total cost of Alternative Strategy dry weather diversions is significantly greater than for Preferred Strategy. This should be clear in final version.
Discussion of Reasonable Assurance?	Text added
Flip Chart Notes from November 29 meeting:	
Comment	Response
More Specific Description of the NOTF	Text added.
Include a sentence to note that water reuse of 4 cfs is from City of LA IRP Report	Text added.
Feasibility of treatment at NOTF,	Discussion added.

particularly if flow is taken out from creek (can be under Uncertainty Section, or Category #3 Special Studies to determine unintended consequences)	
Add iterative approach to achieve reasonable assurance toward compliance	Text added.
For Alternative Strategy, expand or include language that will say that if wastewater is treated, there is that option of reuse (not prevented), or some expansion on how wastewater can be reused	Text added.
Statement that some of the options in the preferred strategy are already being implemented in some areas of watershed	Text added.
Suggested changes for the Schedule Table - 1) Change the 3 yrs for the implementation plan 2) 6 months after comments from Regional Board to develop final implementation plan 3) 3 or 4? Years for special studies 4) 3.5- 4 years to revisit TMDL (overall plan not to revisit TMDL too close to a compliance deadline) 5) Do things in the first 1-4 (6?) years. Be explicit about addressing "low hanging fruit" in the implementation	For further discussion. Latest Schedule Table revised with changes in the first six years.
Do we know how we can get to dry weather compliance in the estuary? Can it be done in 4 years? Does this have an iterative aspect? How about NOTF permitting?	Iterative discussion added to text. Compliance reasonably assured, but details to be worked out during Implementation Plan and based in part on results of Special Studies.
Include text for steps for dry weather compliance in estuary and reach 1 and 2 across watershed	To be worked out in Implementation Plan
Two types of monitoring= Ambient (precompliance) and TMDL Effectiveness (Compliance) (maybe we can use distinction in Regional Board memo so it will not be too confusing)	Previous TMDLs have various names and definitions for monitoring. Section as it stands discusses two types of monitoring – those not related to compliance, and compliance related.
The implementation Section should have some discussion about the iterative approach and how reasonable assurances on how moving towards compliance can be "measured"	Text added.
The #s and location of monitoring consistent with goals	Monitoring details to be worked out in Monitoring Plan.

Compliance Monitoring * difference between required compliance, the other types captured under "effectiveness" or special studies	See similar response above.
A few ambient sites to assess and determine trends (fixed stations)	Monitoring details to be worked out in Monitoring Plan.
Source ID to include three categories: 1) To determine if TMDL needs to be revisited 2) Effectiveness of TMDL 3) Unintended Impacts of BMP	Special studies incorporated in text to the extent they could potentially suggest to future modifications the TMDL (as distinct from studies related to effectiveness of BMPs, for example).
Reasonable Assurances that Implementation of Preferred Option will comply with WQS (Delete any wording that states otherwise)	Text added.