

**LETTER NO. 2**

Dated: 3/12/01

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Bureau of Engineering  
Inter-Departmental Correspondence

**COMMENT 2.1**

Thank you for the opportunity to review and comment on this Draft EIR for the Los Angeles Sports and Entertainment District. The following comments reflect the views of Bureaus of Sanitation and Engineering, Department of Public Works.

The Draft EIR concludes that there will be no increase in runoff over existing conditions (page 10, under Drainage and Surface Water Quality). The Department's Stormwater Management Division (SMD) has submitted the following comments:

**PROJECT PLANNING:** The applicant must provide a detailed stormwater mitigation plan appropriate and applicable to the project. The plan shall reflect, at a minimum, the Regional Water Quality Control Board's (LARWQCB) Standard Urban Stormwater Mitigation Plan (SUSMP) requirements and shall incorporate post-construction Best Management Practices (BMPs).

Calculations for sizing of the structural BMPs shall be in accordance with the "Development Best Management Practices Handbook, Part B Planning Activities." This handbook can be downloaded off SMD's website at [www.lastormwater.org](http://www.lastormwater.org).

**RESPONSE 2.1**

As was stated in the Draft EIR, Section IV.D. Drainage and Surface Water Quality on page 207, during operations the Project will implement source control and treatment control BMP(s) from the list approved by the Regional Board and included in the Standard Urban Stormwater Mitigation Plan (SUSMP). As was stated in Mitigation Measure 2 on page 207, the Applicant shall construct catch basins, roof drains and surface parking drains connecting directly to the existing storm drain system, and any other drainage improvements, as may be required by the Bureau of Engineering.

The structural BMPs shall be appropriately designed and sized to accommodate runoff from the Project and shall be in accordance with the "Development Best Management Practices Handbook,

An analysis of the Project pre-and post-construction included in the Draft EIR, Section IV.D., Drainage and Surface Water Quality, and Appendix A of this Final EIR shows that water quality discharged from the Project would likely improve after development of the Project.

**COMMENT 2.2**

**PROJECT CONSTRUCTION:** This applicant must prepare a Storm Water Pollution Prevention Plan (SWPPP). For construction projects having between 2 to 5 acres of disturbed soil, the SWPPP shall be prepared in accordance with the Municipal Stormwater NPDES Permit and submitted along with the project plans to the City for permit approval. For construction projects with 5 acres or more of disturbed soil, the applicant shall comply with the California General Construction Activity Stormwater Permit (NPDES No. CAS000002) administered by LARWQCB. As a condition of the building/grading permit approval, the applicant must show the Waste Discharge Identification Number (WDID) as proof of submittal of an NOI and SWPPP to the LARWQCB. The SWPPP must be implemented and posted at the project site, and is subject to review during routine jobsite inspections. In addition, a Wet Weather Erosion Control Plan (WWECP) must be prepared if construction is to be done during the rainy season between October 1 and April 14. The WWECP must also be posted at the project site and is subject to review by the Department of Public Works, Bureau of Contract Administration inspectors during their routine jobsite inspections.

If you have any questions, please call me at (213) 847-8816, or call Wing Tam at (213) 847-5225.

**RESPONSE 2.2**

The Project would comply with the California General Construction Activity Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP) for construction projects with 5 acres or more of disturbed soil, in accordance with the Municipal Stormwater NPDES Permit as was discussed in the Draft EIR, Section IV.D. Drainage and Surface Water Quality on pages 199 through 202 and pages 205 through 207.

Information provided by BOE in this comment regarding the Waste Discharge Identification Number (WDID), implementation and posting of the SWPPP, and the Wet Weather Erosion Control Plan (WWECP) have been added to this Final EIR. Refer to Item IV.D.a in Section II, herein, Corrections and Additions to the Draft EIR.