

Comment Summary and Responses
Administrative Update to Chapter 2 of the Basin Plan

1. County Sanitation Districts of Los Angeles County (Sanitation Districts)
2. Calleguas Creek Watershed Management Plan (Calleguas WMP)
3. Los Angeles River Metals Jurisdictional Group 1 TMDL Technical Committee (JG1)
4. County of Los Angeles (County) and the Los Angeles County Flood Control District (LAFCD)
5. City of Oxnard
6. City of Los Angeles
7. Theresa Jordan

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1.1	Sanitation Districts	<p>The County Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to submit comments on the California Regional Water Quality Control Board, Los Angeles Region’s (Regional Board’s) proposed non-regulatory amendments to administratively update Chapter 2, “Beneficial Uses,” of the Water Quality Control Plan for the Los Angeles Region (Basin Plan). The Sanitation Districts are a confederation of 23 special districts, which operate and maintain regional wastewater and solid waste management systems for over 5 million people who reside in 78 cities and unincorporated areas in Los Angeles County. The Sanitation Districts operate 11 wastewater treatment plants and maintain approximately 1,400 miles of sewer lines, which convey flows from industries and municipalities within service areas to the aforementioned wastewater treatment plants. Sanitation Districts' water reclamation facilities discharge into inland surface waters and waters of the state, including groundwater. As such, the Sanitation Districts' operations may be affected by the Basin Plan amendments and their implementation.</p>	Comment noted.
1.2	Sanitation Districts	<p>The Sanitation Districts appreciate the Regional Board’s efforts to update Chapter 2 of the Basin Plan by incorporating updated surface and groundwater maps, aligning the beneficial use (BU) tables with the updated maps, and incorporating language of previously adopted Basin Plan amendments. These changes will bring about clarity and make the Basin Plan easier to use. To build on this effort, the Sanitation Districts recommend that, after this update has been completed, the Regional Board update the electronic version of the Basin Plan as soon as any future changes take</p>	<p>It is the Regional Board’s intent that in the future, the Basin Plan will be more routinely updated to reflect each newly adopted Basin Plan amendment. At present, however, we are focused on updating the 1994 Basin Plan in its entirety and expect to have this completed by summer 2012. As each chapter is updated, a PDF file of the updated chapter will be posted on the Regional Board’s website.</p>

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		effect so that a current version is always available to the public. This will help reduce confusion as to the applicable provisions of the Basin Plan, while minimizing errors in future application of the Basin Plan in various contexts (e.g. water quality assessments and TMDLs) because the changes will be made while the amendments are still fresh in everyone’s mind. Given the complexity and number of Basin Plan amendments, including adoption of TMDLs, which occur each year, implementation of this recommendation, would be extremely valuable.	
1.3	Sanitation Districts	While the Sanitation Districts believe that the updated Basin Plan will be a more useful document than the current plan, our review of the proposed updates indicates that there are several proposed amendments that appear to have regulatory implications and are not solely administrative. Several errors or oversights were also discovered, which should be corrected prior to adoption in order to avoid making unintentional substantive changes or mistakes during this update.	The purpose of the proposed Regional Board action is to adopt non-regulatory amendments to administratively update Chapter 2 of the Basin Plan. Staff has provided clarifications and revisions to the draft documents to ensure that the updates are purely administrative and do not have any new regulatory implications. In addition, any errors or oversights identified by the Sanitation Districts, where confirmed by Regional Board staff, have been corrected in the revised draft documents. Responses to specific comments are provided in the responses to Comments 1.4 through 1.16 below.
1.4	Sanitation Districts	Given the complex nature and large number of changes (that have occurred since 1994) being included in this Basin Plan Update, it is possible that there may be other errors that have not been discovered during the public review process. To ensure that any errors discovered in the future can be appropriately resolved, we strongly suggest that the Resolution accompanying adoption of this Basin Plan amendment make it clear that no substantive changes to the Basin Plan were made during this update and that it is [the] intent of the Regional Board to direct staff to correct, through a subsequent Basin Plan amendment, any inadvertent errors made during the process.	The tentative Resolution adequately explains that the proposed changes to the Basin Plan are non-regulatory in nature. Specifically, Finding No. 6 states: “This administrative update is non-regulatory in nature and imposes no new regulatory requirements. . . . The non-substantive changes are intended solely to improve the clarity and convenience of the Basin Plan.” The tentative Resolution does allow for non-substantive changes to be made to the amendment after Regional Board adoption, as it goes through the approval process (see Finding No. 15 and Resolve No. 6 of the Tentative Resolution). For possible errors in the rest of the Basin Plan, there will be an opportunity to make

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			<p>corrections during the administrative updates of the remaining chapters of the Basin Plan that is scheduled to occur in phases through summer2012. In addition, corrections of this nature could be made by the Regional Board at any time, either separately or as part of some other Basin Plan amendment.</p>
1.5	Sanitation Districts	<p><u>Geographic Information and Maps</u> Geographic information is a key foundation of the Basin Plan, because it delineates boundaries for hydrologic units and groundwater basins, which in turn define where BUs apply. Updated geographic information data sets should not be used by the Regional Board without a careful examination to ensure that use of the updated data set does not change where BUs apply. It is our understanding that it is not the intent of Regional Board staff in preparing this Basin Plan amendment to make any changes to waterbody reach or groundwater basin designations that would result in the application of new BUs, which potentially would trigger regulatory impacts.</p>	<p>The commenter is correct that it is not the intent of the Regional Board to make any changes to waterbody reach or groundwater basin designations that would result in the application of new beneficial uses, which would potentially trigger regulatory impacts, during this update to Chapter 2 of the Basin Plan. As stated in Finding No. 6 of the tentative resolution, “These amendments do not involve changes to beneficial use definition, nor do they assign, modify, or delete beneficial use designations to any surface or ground waters within the region.”</p>
1.6	Sanitation Districts	<p>When the 1994 Basin Plan was adopted, the Regional Board used the Department of Water Resources (DWR) hydrologic classification system for surface waters which, per the Staff Report, was in turn based on the 1978 United States Geological Survey (USGS) Watershed Boundary Delineation. This dataset is referred to as CalWater 1.0. For groundwater, the Regional Board used DWR Bulletin 118-80. Because these are the datasets used to formally adopt the 1994 Basin Plan, the boundaries where the 1994 Basin Plan BUs apply are the CalWater 1.0 and DWR Bulletin 118-80 datasets. While the Staff Report states that the Water Boards are now using CalWater 2.2.1, any discrepancies in where BUs apply should be resolved by referencing the CalWater 1.0 dataset. A decision by Water Board staff to use an updated</p>	<p>The proposed Basin Plan amendment is intended to be purely an administrative update and non-regulatory in nature. All reaches or water body segments are to retain the beneficial uses that are designated in the 1994 Basin Plan, regardless of any name or reach changes.</p> <p>The 1994 Basin Plan was based on CalWater 1.0 hydrologic units, and this, not a more recent dataset, was used to cross-reference the CalWater boundaries to the USGS Watershed Boundary Dataset (WBD). The Staff Report does state that the “State Water Board still uses CalWater 2.2.1 to define hydrologic units.” However, due to the issues related to changes in the numbering of hydrologic units, the Regional Board never switched from CalWater 1.0 to CalWater 2.2.1. Therefore, all of the cross-referencing for this administrative</p>

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		<p>set of geographic information is not a formal regulatory action that can be used to change where beneficial uses are assigned. While the Sanitation Districts appreciate the careful attention being paid by Regional Board to cross-referencing the CalWater boundaries to the USGS Watershed Boundary Dataset (WBD) that will be used in the future to delineate surface waters, we believe that the appropriate data to be used for the cross-referencing is CalWater 1.0, not a more recent data set. One example of where there is a discrepancy between CalWater data sets is the boundary between hydrologic units 405.42 and 405.43. It appears that earlier versions of CalWater (as of 1995) placed this boundary at Van Tassel Canyon, but a later version (from 2004) placed it at Morris Dam (see Figure 1). While the Basin Plan Memo states that the most current version of CalWater was used to place this boundary, which would have placed the boundary at Morris Dam, the boundary was instead correctly placed at Van Tassel Canyon, consistent with the earlier versions of CalWater.</p>	<p>update was based on CalWater 1.0., which is our most current and correct version. Staff has reviewed the cross-reference tables to confirm that they do not contain discrepancies due to incorrect reference boundaries. The location of the boundary between units 405.42 and 405.43 is correctly identified at Van Tassel Canyon.</p>
1.7	Sanitation Districts	<p>Furthermore, once the Basin Plan update is completed, the Regional Board should continue to rely on the geographic information that was used for the update, and the Staff Report for the update should be specific as to which version of the USGS datasets is being used. If use of a newer dataset is desired in the future, public notice and careful cross-referencing should be conducted to ensure that use of the newer dataset does not have undisclosed regulatory impacts, such as changing the applicable BUs.</p>	<p>The Regional Board will continue to rely on the geographic information that was used for the current update. In the event that a newer dataset is considered necessary, there will be a full public process allowing for stakeholder involvement, and caution will be exercised to prevent any unintentional regulatory impacts.</p>
1.8	Sanitation Districts	<p>Additionally, the Sanitation Districts request clarification of whether the underlying GIS data layers upon which the Chapter 2 maps and tables are based are being adopted into the Basin Plan as part of this Basin Plan amendment.</p>	<p>The Regional Board is not the steward of the GIS data layers that are being used and relied on for the maps and tables, and thus the board neither controls nor guarantees the editing, distribution, or accuracy of these layers. Therefore, staff do</p>

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		<p>Occasionally, there are situations where very detailed information is needed to verify where a reach boundary (or hydrologic unit boundary) occurs, such as the situation described above (and discussed further below in the section on Changes to Beneficial Uses), and that examination may require a greater degree of resolution than the maps and tables included in Chapter 2 can provide. As such, it would be reasonable to consult the GIS layers for more detailed information. That therefore raises the question of whether the GIS layers themselves are legally part of the Basin Plan. We request that the Regional Board clarify this matter prior to adoption of this Basin Plan amendment, and add a statement to the Basin Plan, if appropriate, indicating that the GIS layers are considered part of the Basin Plan (and indicating how they may be accessed by the public).</p>	<p>not intend for the GIS data layers themselves to be formally adopted into the Basin Plan. They do, however, serve as the best resource available to staff at this time in conducting the work of the Regional Board. Accordingly, the versions of the GIS data layers staff used and relied on in preparing the updates to the Chapter 2 maps and tables will be a part of the administrative record for this update and have been made available to the public via our website.</p>
1.9	Sanitation Districts	<p><u>Surface Waters- Conditional MUN Designation</u> The proposed amendments include deletions and additions to the text of Chapter 2 (pages 2-3 and 2-4 of the 1994 Basin Plan) that were purported to have been adopted as part of Regional Board Resolution No. 98-018. These proposed amendments affect how the conditionally designated MUN (primarily P*MUN and I*MUN) beneficial uses are applied in discharge permits and in other regulatory programs. The administrative record for this resolution provides no evidence that such language changes were approved by the Office of Administrative Law (OAL) or the United States Environmental Protection Agency (USEPA), and thus the language changes have no legal effect. Therefore, it is not appropriate for the proposed language changes to be included in this Basin Plan update.</p> <p>The Basin Plan Memo indicates that it is the intent of the Regional Board to rescind the proposed language changes to Chapter 2 regarding the conditionally designated MUN use. In the event that these changes are not rescinded, the</p>	<p>As detailed in the staff report released for public comment on August 19, 2011, the Regional Board adopted Resolution No. 98-018 on November 2, 1998, which amended the Basin Plan by modifying the beneficial uses of eleven surface waterbodies and two specific areas of the West Coast groundwater basin. This amendment also included textual changes to pages 2-3 and 2-4 of the 1994 Basin Plan, under the heading “Beneficial Uses for Specific Waterbodies”, which were designed to update those pages in accordance with the Regional Board’s action. On February 18, 1999, the State Water Board adopted Resolution No. 99-20 approving the amendment. The Office of Administrative Law (OAL) subsequently disapproved the amendment on July 15, 1999. In the written discussion of its disapproval, OAL stated that the surface water portions of the amendment did not meet OAL standards for approval, but indicated that the two areas of the West Coast groundwater basin did meet the requirements for dedesignation of the MUN beneficial use.</p> <p>Following this, on December 29, 1999, the State Water Board</p>

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		<p>Sanitation Districts would strongly object to the proposed language changes. Detailed comments on the basis for this objection are provided in Attachment B.</p>	<p>resubmitted to OAL only the groundwater portions of the regulatory provisions of the amendment. Noticeably absent from the State Board’s resubmittal was any modified version of the textual changes to pages 2-3 and 2-4 of the 1994 Basin Plan. On February 9, 2000, OAL approved the regulatory provisions of the Basin Plan removing the MUN beneficial use designation from the portion of West Basin underlying the Chevron facility in El Segundo and the aquifers underlying Terminal Island and parts of the Greater Los Angeles and Long Beach Harbors complex.</p> <p>Given that the State Water Board’s resubmittal to OAL did not include a modified version of the textual changes to pages 2-3 and 2-4 of the Basin Plan, staff attempted to carve out those portions of the textual changes specific to what was actually approved by OAL, namely those related to the groundwater dedesignations. This was the language released in the August 19, 2011 draft documents for public review and comment.</p> <p>However, after consideration of initial stakeholder concerns and reviewing the administrative record for the 1998 amendment, staff concluded that the textual changes in the 1998 amendment were not written in a manner that strictly distinguishes between the decision process for surface water changes and that for groundwater. In addition, it is reasonable to assume that OAL did not actually approve the textual changes to pages 2-3 and 2-4 when it approved the groundwater dedesignation portion of the 1998 amendment in 2000.</p> <p>Therefore, staff believe it is appropriate to entirely exclude the proposed textual changes related to Resolution No. 98-018 and limit the incorporation of the 1998 amendments to the Basin Plan solely to the removal of the MUN uses of the two</p>

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			<p>portions of the West Coast groundwater basin as described in the concise summary of regulatory provisions approved by OAL and shown in Table 2-2 of the Basin Plan. Thus, the text on pages 2-3 and 2-4 of the 1994 Basin Plan, under the heading “Beneficial Uses for Specific Waterbodies”, will not change.</p>
1.10	Sanitation Districts	<p><u>Surface Waters- Changes to Beneficial Uses</u> The Sanitation Districts support the incorporation of updated BU tables into the Basin Plan, as the updated tables will provide additional clarity as to where each BU applies. However, review of the updated surface water maps and tables indicate that several errors were made in the process that, unless corrected, would result in substantive changes to the Basin Plan.</p> <p>Of particular concern are the beneficial uses assigned to the portion of the San Gabriel River (SGR) located upstream of the Santa Fe Dam but south of Foothill Boulevard. This portion of the river was in Reach 3 of the SGR and Hydrologic Unit 405.41 in the 1994 Basin Plan (the boundary between Hydrologic Units 405.41 and 405.42 marks the boundary upstream of which different BUs apply, including MUN, and below which a high flow suspension applies). The associated BUs were P*MUN, I GWR, Im REC-1, I REC-2, I WARM, and E WILD, as well as a high flow suspension for the recreational uses.</p> <p>Under the proposed update, the portion of the SGR between the Santa Fe Dam and Foothill Boulevard would become part of Reach 5, with associated existing beneficial uses of MUN, IND, PROC, AGR, GWR, REC-1, REC-2, WARM, COLD, WILD, and RARE. Moving the boundary where the modified BUs apply from Foothill Boulevard to the base of Santa Fe Dam would be a substantive amendment that could significantly obstruct future efforts to recharge the Main San</p>	<p>As discussed in the draft staff report, some reaches have been further defined since 1994 through TMDLs and other Basin Plan amendments, and the Chapter 2 administrative update to the Basin Plan reflects these reach definitions. This update maintains the 1994 assignment of beneficial use designations to each waterbody segment, regardless of any new reach boundaries. Any errors noted and confirmed will be corrected prior to Board adoption. In the San Gabriel River TMDL, the upstream boundary of Reach 4 is at the Santa Fe Dam; therefore, Reach 5 begins immediately upstream of the dam. While the reach boundary may have changed as a result of the TMDL, the beneficial use designations remain the same. Therefore, the beneficial uses of the area previously under hydrologic unit 405.41 will be maintained, and the distinction will be clearly made in the beneficial use tables. This distinction was inadvertently overlooked and the oversight will be corrected in modified versions of all applicable documents prior to consideration by the Regional Board.</p>

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		Gabriel Basin with recycled water, due to the application of the existing MUN use in particular. The Basin Plan Memo indicates that it is the intent of Regional Board staff to correct this error and the Sanitation Districts strongly support this correction.	
1.11	Sanitation Districts	Furthermore, the proposed updated version of the Basin Plan does not include a high flow suspension for the new SGR Reaches 3 and 4. The new Reach 3 extends from Whittier Narrows Dam upstream to Ramona Boulevard, and the new Reach 4 extends from Ramona Boulevard upstream to Santa Fe Dam. Both of these reaches are fully in the 1994 Hydrologic Unit 405.41. Per Regional Board Resolution No. 2003-010, the portion of the San Gabriel River in Hydrologic Unit 405.41 was assigned the high flow suspension. This error should be corrected in the proposed Basin Plan update.	This error will be corrected in modified versions of all applicable documents prior to consideration by the Regional Board.
1.12	Sanitation Districts	<u>Surface Waters- Reach Changes</u> It is our understanding that the names and boundaries of a number of reaches were changed during development of Total Maximum Daily Loads (TMDLs), other Basin Plan amendments, and biennial water quality assessments conducted since 1994. Unfortunately, some of the changes were not publicly noticed or explained during those processes. In the future, the Sanitation Districts request that, when changes to reach designations and boundaries are made during any basin planning process or water quality assessment, the Staff Report accompanying the action clearly explain the changes and the reasoning for them. Even when the BUs associated with a water body segment are not altered by changing the boundaries of a reach, the change in boundaries can have a regulatory impact. In particular, determinations of impairments for use in the 303(d) listing process are made on a reach-by-reach basis. When the boundary of a reach is	While the commenter correctly notes that the names and boundaries of some reaches were changed via previously adopted TMDLs or other Basin Plan amendments, staff disagree with the commenter that these changes were not publicly noticed prior to adoption of those Basin Plan amendments. The reach changes were included in draft documents released for public review prior to the adoption of the related Basin Plan amendments. Comments concerning the appropriateness of previously adopted Basin Plan amendments are outside the scope of this action. However, in order to provide greater clarity in the future, staff will endeavor to highlight such changes separately and/or discuss such changes in greater detail when made as part of a proposed Basin Plan amendment or other Board action.

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		<p>moved or a reach is sub-divided, the water quality data available for that reach may change (depending on the location of monitoring stations), and thus determinations of impairments may change, along with the associated need to develop TMDLs and assign wasteload allocations. Sub-dividing reaches, combining reaches, and moving boundaries should all be treated as substantive changes that need to be properly evaluated and publicly noticed before adoption. The regulatory impact of changing the boundaries of the reaches in the SGR was not evaluated nor publicly noticed during any TMDL or biennial water quality assessment.</p>	
1.13	Sanitation Districts	<p>The Sanitation Districts also recommend that the Staff Report accompanying the Chapter 2 Basin Plan update provide clear guidance for water quality assessments to determine impairments when a reach contains more than one Hydrologic Unit Code (HUC). One example of this is Coyote Creek. While the updated Basin Plan does not split Coyote Creek into named reaches, Tables 2-1 and 2-1a contain narrative descriptions of two different portions of the creek corresponding to two different HUCs (above and below La Canada Verde Creek). This results in a lack of clarity as to whether water quality assessments should be evaluated for the entire Coyote Creek or for each HUC. The Staff Report should make it clear that water quality assessments should continue to be evaluated for the entire water body (i.e. Coyote Creek), not the portions lying in different HUCs. The Sanitation Districts appreciate Regional Board staff clarification of this issue in the Basin Plan Memo, and request that Regional Board staff include similar clarification in the Staff Report.</p>	<p>The changes in hydrologic units have resulted in cases where a single reach may have more than one hydrologic unit associated with it. Where these hydrologic units have the same beneficial uses, each reach is considered as a whole in water quality considerations. However, where beneficial uses vary between different hydrologic units within one reach; these portions are addressed individually for the purpose of water quality assessment.</p> <p>The staff report will be revised to reflect this clarification.</p>
1.14	Sanitation Districts	<p><u>Groundwater- Sub-basin Identification</u> The 1994 Basin Plan groundwater basin maps contained numerous sub-basins that are no longer included in the groundwater basin maps</p>	<p>Staff agrees that delineating the groundwater sub-basins on the updated maps will provide better clarity in determining where beneficial uses and water quality objectives apply.</p>

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		<p>of the updated Basin Plan. The Sanitation Districts understand this is a result of the California Department of Water Resources (DWR) updating their maps and combining some sub-basins into larger basins. However, sub-basins are still identified in Table 2-2 and several sub-basins have different BUs.</p> <p>In addition, different water quality objectives in Chapter 3 of the Basin Plan apply in different sub-basins. Without maps delineating the sub-basins, it is impossible to tell where the BUs and objectives apply. Therefore, Chapter 2 should include maps that depict the locations of the sub-basins.</p>	<p>Greater visual clarity for the updated groundwater basin maps will be provided to allow for the easy identification of sub-basins prior to the Regional Board’s consideration of the administrative update to Chapter 2.</p> <p>It is not the purpose or intent of this administrative update to change the application of any water quality objectives. Therefore, the current water quality objectives still apply in each sub-basin regardless of their reassignment(s).</p> <p>In addition, an administrative update to Chapter 3 of the Basin Plan, which contains the groundwater quality objectives, is scheduled for 2012, at which time care will be taken to align the applicable existing water quality objectives with each sub-basin.</p>
1.15	Sanitation Districts	<p><u>Groundwater- Beneficial Use Changes</u></p> <p>In addition to the issue discussed above, use of the updated DWR groundwater basin maps to create in Chapter 2 of the Basin Plan has resulted in the changing of boundaries for groundwater basins and, as a result, changes to where BUs and water quality objectives apply. Changing BUs and water quality objectives have regulatory implications and are not solely administrative. No analysis was conducted to determine whether changing boundaries would have regulatory impacts. Therefore, the boundaries for all groundwater basins and sub-basins should be restored to their 1994 locations until such an analysis is performed.</p>	<p>This administrative update does not change any beneficial uses or water quality objectives. All groundwater basins and sub-basins retain the designated beneficial uses from the 1994 Basin Plan regardless of boundary changes or their reassignment(s) to other major basins. It is not the intention of this proposed administrative update to effect any regulatory changes to the application of water quality objectives or beneficial uses of any groundwater basins or sub-basins.</p> <p>Beneficial uses and water quality objectives apply to specific waterbodies as a whole, or portions thereof, and are established accordingly. Thus, the existing groundwater beneficial uses and water quality objectives apply to each groundwater basin or sub-basin in their entirety. Any modifications to the boundaries of the basins or sub-basins based on more accurate information does not result in any new beneficial uses or water quality objectives for that waterbody, and thus do not constitute a regulatory change. This action merely provides greater detail on the boundaries of each basins, based on more current data.</p>

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1.16	Sanitation Districts	<p><u>Minor Corrections</u></p> <ul style="list-style-type: none"> • Footnote c of Table 2-1 Beneficial Uses of Inland Surface Waters is missing on page 2-7. • Footnote j (relating to Dry Canyon Reservoir) is missing in the following locations: Page 2-8 of Table 2-1 and Page 2-18 of Table 2-1a. • Per Table 2-1 on page A-21, “Devil’s Gate Reservoir (Upper)” and “Devil’s Gate Reservoir (Lower)” are now both “Devil’s Gate Reservoir”. However, Table 2-1, page 2-12, lists “Devils Gate Reservoir (upper).” Note that Devil’s Gate Reservoir (Upper) and Devil’s Gate Reservoir (Lower) have different BUs assigned in the 1994 Basin Plan. • The following descriptions are missing for Marshall Creek and Wash in Table 2-1: “Puddingstone Reservoir to Via Arroyo” on page 2-14 and “above Via Arroyo” on page 2-15. • On page A-21, the hydraulic unit number is incorrect for both the Arcadia Wash (Upper) and the Arcadia Wash (Lower). It appears as if these two have been inadvertently switched. According to the existing Basin Plan, these numbers should be 405.33 and 405.41, respectively. • On page A-23, the hydraulic unit number is incorrect for Puddingstone Wash. According to the 1994 Basin Plan, this number should be 405.41, not 405.52 as currently listed in the proposed Basin Plan update. • Table 2-1 Cross Reference Table for Inland Surface Waters contains several references to footnotes; however, an explanation of those footnotes has not been included. • In Table 2-1a, footnote c is missing for McGrath Lake (page 2-16). • Table 2-1a footnote “av” is missing a period between 	<p>These errors will be corrected, as appropriate, in modified versions of the tables prior to consideration by the Regional Board.</p>

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		<p>“...to protect those activities” and “Water quality objectives...” Also in footnote “av”, the phrase “where the (ad) footnote appears” should be changed to “where the (av) footnote appears.”</p> <ul style="list-style-type: none"> • Tables 2.1 and 2.1a are missing the narrative description for San Gabriel River Reach 4 (i.e., Ramona Blvd. to ...) • In the proposed Table 2-1 Beneficial Uses of Inland Surface Waters, the RARE BU was inadvertently changed to MIGR for the portion of the new Reach 5 in the old HUC 405.42. • The last sentence of footnote ac on Table 2-2 should read: Furthermore, ground waters outside of the major basin basins are either potential or existing sources of water for down gradient basins, and such, beneficial uses in the down gradient basins shall apply to these areas. • Footnote ai on Table 2-2 explains the separating and combining of the San Gabriel Valley area, however the same is not done for the other basins that have been combined or separated. A footnote should be added for these other areas, including the Raymond Basin. In addition, footnote ai states that Monk Hill sub-basin is now part of the San Fernando Valley Basin, however, Figures 2-16 and 2-17 show Raymond Basin as a separate basin and not part of the San Fernando Valley Basin. • In Table 2-2 DWR Basin No. 4-4.07 should be labeled “Santa Clara River Valley East” instead of “Santa Clara River East”, to be consistent with Figure 2-14. • In Table 2-2, no BUs are listed for the Conejo-Tierra Rejada Volcanic area, however, the 1994 Basin Plan lists MUN (E) and AGR (E). 	
1.17	Sanitation	In a meeting with Regional Board staff on September 14,	The version of the WBD used by staff was downloaded in

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	Districts	2011 to discuss the proposed update to Chapter 2 of the Basin Plan, staff from the Sanitation Districts pointed out certain discrepancies between the hydrologic unit numbers from the Watershed Boundary Dataset (WBD) provided in the draft documents for the proposed amendments and those currently available from USGS.	<p>May of 2011, and was the most current version at that time. The draft beneficial use tables and maps released for public comment were based on that version. The dataset has been updated since then and the most current version available is dated September 9, 2011.</p> <p>Stewardship of the WBD for California was originally with the Wyoming Geographic Information Center under contract with the USGS. After completion of the WBD in 2009 the stewardship of the data was transferred to state coordinators. Errors in the downstream coding were discovered, most of which have been corrected in the past year. Other edits to HUC codes may have resulted during this effort. Names were also reviewed and corrected to meet WBD Standards. The most recent version of the WBD that reflects all of these edits is the September 9, 2011 version.</p> <p>This most recent version of WBD has been closely compared to the version used in this update for the entire region. The only differences found in the actual boundaries were in three small coastal areas. In several watersheds, however, while the boundaries did not change the numbering has been modified.</p> <p>The draft tables have been updated to align with the September 9, 2011 version of the WBD. These revisions were possible since the watershed boundary changes are limited to three small coastal areas of the Los Angeles region.</p>
2.1	Calleguas WMP	On August 19, 2011, the California Water Quality Control Board Los Angeles Region (Regional Board) released the Proposed Non-Regulatory Amendments to Administratively Update Chapter 2: "Beneficial Uses" of the Basin Plan. The Parties Implementing TMDLs in the Calleguas Creek Watershed (Parties) appreciate the opportunity to provide comments on the amendments. Overall, though we feel the	<p>Please see responses to Comment Nos. 2.2 through 2.14 for responses to specific comments.</p> <p>The typographical and other errors noted by the commenter will be corrected in the draft documents prior to consideration by the Regional Board. Corrections of such errors, however, do not constitute substantive changes that require recirculation</p>

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		<p>amendments will bring much needed clarity to this Chapter of the Basin Plan, we have identified a number of potential errors and typos that should be corrected prior to adoption. Additionally, given the number of potential errors, we request that the revised Basin Plan Amendment be re-noticed to allow for stakeholder review prior to the adoption of the amendments. Following is a discussion of the Parties requested modifications.</p>	<p>of the draft documents for another public comment period. Revised tentative versions of the proposed Basin Plan Amendment based on comments received will be made available to the commenter and other interested persons prior to the Board meeting.</p>

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2.2	Calleguas WMP	<p>Asterixed Municipal Drinking Water Beneficial Uses</p> <p>The Parties feel that RWQCB staff may have erred during incorporation of the Basin Plan Amendment for Dedesignation of the MUN beneficial use from portions of the West Basin groundwater basin. The Parties feel that the language modifications to Chapter 2 Beneficial Uses for Specific Waterbodies were not specifically identified in the version of the Basin Plan Amendment that was approved by OAL. In particular, the Parties feel that the language that was deleted from this section should be retained. It is our understanding that it is RWQCB staff’s intent to retain this language and we would like to support this proposed change.</p> <p>Request: The Parties request that the following stricken language from the 1994 Basin Plan be retained in the Basin Plan Amendment: While supporting the protection of all waters that may be used as a municipal water supply in the future, the Regional Board realizes that there may be exceptions to this policy. In recognition of this fact, the Regional Board will soon implement a detailed review of criteria in the State Sources of Drinking Water policy and identify those waters in the Region that should be excepted from the MUN designation. Such exceptions will be proposed under a special Basin Plan Amendment and will apply exclusively to those waters designated as MUN under SB Res. No. 88-63 and RB Res. No. 89-03. In the interim, no new effluent limitations will be placed in Waste Discharge Requirements as a result of these designations until the Regional Board adopts this amendment.</p>	Please see response to Comment No. 1.9
2.3	Calleguas WMP	<p>Apparent Errors in Translation to New Reach Designations for Calleguas-Conejo Creek Watershed</p> <p>The Parties have identified several areas where the new reach definitions appear to have resulted in portions of the waterbody that are now assigned different beneficial uses.</p>	Staff has reviewed the beneficial use designations for all waterbody segments including those in the Calleguas Creek Watershed identified by the commenter. Table 2.1 will be revised to reflect correct beneficial uses for segments of Calleguas Creek Reach 9A, Calleguas Creek Reach 9B,

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		<p>Because we were not able to access an electronic version of CalWater 1.0, the comparison was done between the RWQCB provided GIS files for the WBD No. and CalWater 2.2.1. As a result, we recognize that the exact boundaries identified may not be accurate. However, we would like a review of the identified waterbody segments to ensure the beneficial uses are correct. Following is a summary of waterbody segments that appear to be assigned different beneficial uses as a result of this comparison.</p> <p>Request: Review the Calleguas-Conejo Creek Watershed beneficial use designations for waterbody segments (such as those identified above) that may have different beneficial uses as a result of the new reach designations. Modify the reaches and beneficial uses as appropriate.</p>	<p>Calleguas Creek Reach 10, and Calleguas Creek Reach 7. These revisions will be based on CalWater 1.0 and not CalWater 2.2.1 that was referenced by the commenter.</p>
2.4	Calleguas WMP	<p>Potential Errors in Tables for Calleguas-Conejo Creek Watershed</p> <p>The Parties have identified the following potential errors in Table 2-1 Beneficial Uses of Inland Surface Waters (Beneficial Use Table) and Table 2-1 Cross Reference Table for Inland Surface Waters (Cross Reference Table).</p> <p>1. Calleguas Creek Reach 12: North Fork Arroyo Conejo (Above Arroyo Conejo) appears to now have an Existing beneficial use of PROC. However, in Table 2-1 of the 1994 Basin Plan, North Fork Arroyo Conejo (403.64) does not have this beneficial use designation. According to the Cross Reference Table, Calleguas Creek Reach 12: North Fork Arroyo Conejo (Above Arroyo Conejo) corresponds to North Fork Arroyo Conejo (403.64). As a result, we feel that the PROC beneficial use should be removed.</p>	<p>This error will be corrected and the beneficial use table revised, prior to consideration by the Regional Board.</p>
2.5	Calleguas WMP	<p>2. For consistency with the Cross Reference Table and to be consistent with the location of the waterbody, Calleguas</p>	<p>Staff agrees that a change should be made for consistency between Table 2.1 and the Cross Reference Table. In keeping</p>

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		Creek Reach 13: Arroyo Conejo (above North Fork Arroyo Conejo) should be renamed Calleguas Creek Reach 13: Arroyo Conejo (Arroyo Conejo to headwaters) in the Beneficial Use Table. Reach 13 is not located above the North Fork Arroyo Conejo, but instead is a separate fork of Arroyo Conejo.	with the naming convention applied elsewhere, the following name will be used “Calleguas Creek Reach 13: Arroyo Conejo (above confl. with North Fork Arroyo Conejo)”. This is because the waterbody continues to be called Arroyo Conejo upstream of the confluence with North Fork Arroyo Conejo.
2.6	Calleguas WMP	3. The WBD No. for Calleguas Creek Reach 4: Revolon Slough (Central Ave. to Pleasant Valley Rd.) and Calleguas Creek Reach 4: Revolon Slough (Pleasant Valley Rd. to Calleguas Creek Rch 2) are switched in the Beneficial Use Table (though correct in the Cross Reference Table).	This error will be corrected and the beneficial use tables revised, prior to consideration by the Regional Board.
2.7	Calleguas WMP	4. Revolon Slough discharges directly into Reach 1-Mugu Lagoon, not Calleguas Creek Reach 2. As a result, we request that the name be changed to Calleguas Creek Reach 4: Revolon Slough (Pleasant Valley Rd. to Calleguas Creek Rch 1) in both the Cross Reference and Beneficial Use Tables.	Revolon Slough discharges directly into the tidally-influenced portion of Calleguas Creek, which is Reach 2. Mugu Lagoon is further downstream below Ronald Reagan Blvd. The nomenclature used in the draft documents is accurate; therefore, the requested changes need not be made to the Cross Reference and Beneficial Use Tables.
2.8	Calleguas WMP	5. Please rename Calleguas Creek Reach 3: Calleguas Creek (Potrero Road to Conejo Creek) as Calleguas Creek Reach 3: Calleguas Creek (Conejo Creek to Potrero Road) to make the nomenclature consistent with the rest of the reaches. Conejo Creek is upstream of Potrero Road. This change should be made in both the Cross Reference and Beneficial Use Tables.	<p>The commenter appears to be unclear about the naming convention applied in this update to the beneficial use tables. The naming convention used in the 1994 Basin Plan update was maintained for this proposed update.</p> <p>In general, the beneficial use tables are organized by watershed beginning with the northern boundary of our region and working toward the southern boundary. Within each watershed, the waterbodies are listed beginning with the mouth of the main stem and working upstream through the main stem and each of its tributaries. Both the main stem and tributaries are typically listed as different segments.</p> <p>Following the name of each segment is a description (in parentheses) of the extent of that segment from the point furthest downstream to the point furthest upstream. The</p>

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			<p>headwaters (most upstream) segment of each stream is identified as “above” the last point described.</p> <p>“Calleguas Creek Reach 3: Calleguas Creek (Potrero Road to Conejo Creek)” is consistent with this naming convention.</p>
2.9	Calleguas WMP	<p>6. Reach 6-Arroyo Las Posas (Long Canyon to Calleguas Creek Reach 3) should have a WBD No. of 180701030103. The designation of 180701030105 appears to be an artifact of a very small portion of this reach showing up in this HUC in GIS. However, this is likely an artifact of the GIS maps used and the majority of the waterbody is in 180701030103. This change should be made in both the Cross Reference and Beneficial Use Tables.</p>	<p>This error will be corrected and the beneficial use tables revised, prior to consideration by the Regional Board.</p>
2.10	Calleguas WMP	<p>7. Arroyo Conejo 406.68 should be Arroyo Conejo 403.68 in the Cross Reference Table.</p> <p>8. Tapo Canyon Creek 403.67 is listed twice in the Cross Reference Table and one of the references should be deleted.</p> <p>9. Please rename Reach 13-North Fork Arroyo Conejo (Arroyo Conejo to headwaters) as Reach 13-Arroyo Conejo (Arroyo Conejo to headwaters) in the Cross Reference Table. This will make it consistent with the Beneficial Use Table and designate the correct waterbody name.</p> <p>Request: Revise the Beneficial Use and Cross Reference Tables to correct the inconsistencies and typos identified.</p>	<p>The error noted for Arroyo Conejo will be corrected and the cross-reference table revised, prior to consideration by the Regional Board.</p> <p>Tapo Canyon Creek is listed twice in the Cross Reference Table because it was included in two hydrologic units (403.66 and 403.67) in the 1994 Basin Plan. The cross reference table will be revised to reflect this.</p> <p>For the error noted for Reach 13, the cross reference tables will be revised to reflect the correct waterbody name.</p>
2.11	Calleguas WMP	<p>Clarification and Potential Errors in Appendix A Inventory of Major Surface Waters for Calleguas-Conejo Creek Watershed</p>	<p>The commenter suggests that more detail be provided when naming reaches in the tributary table in order that the naming conventions be consistent with that in the beneficial use</p>

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		<p>The Parties are concerned about the addition of 33 previously unnamed waterbodies to this Appendix. We have identified a number of waterbodies that appear to have been assigned as a tributary incorrectly. Additionally, we feel that the naming conventions in this table should be consistent with the Beneficial Use and Cross Reference Tables to avoid confusion. As several changes are requested, we have attached a strike out/edit version of the table showing the suggested revisions for the Calleguas-Conejo Creek Watershed. An extra column is included to explain the requested changes.</p> <p>Request: Replace the Calleguas-Conejo Watershed portion of Appendix 1 with the attached table</p>	<p>tables.</p> <p>The purpose of the Tributary Table is to provide a simplified reference to identify the receiving water to which another waterbody is tributary. The list is compiled alphabetically for ease of use. Once the receiving water is thus identified, more detail may be obtained from the beneficial use table. Providing the same level of detail in the Tributary Table as that provided in the beneficial use table would be redundant and thus is unnecessary for the purpose it is intended for.</p> <p>As an example, having “Arroyo Las Posas” listed in the Tributary Table will assist the reader in locating the name and tributary of that reach more easily than listing it as “Calleguas Creek Reach 6-Arroyo Las Posas (Long Canyon to Calleguas Creek)”.</p> <p>However, staff agree that including the reach number would be beneficial. In the example above, listing Arroyo Las Posas in the tributary table as “Arroyo Las Posas (Calleguas Creek Reach 6)” would facilitate finding the waterbody in the beneficial use tables. Therefore staff will make this change throughout the Tributary Tables.</p>
2.12	Calleguas WMP	<p>Based on the identification of these errors and errors that other agencies have informed us they have identified, the parties request that RWQCB staff conduct a thorough review of the proposed amendments for additional errors. Additionally, the parties request that a qualifying provision be added to the Basin Plan Amendments that allows for identified mistakes to be corrected if identified and documented at a future date. Since the RWQCB’s intent is not to make any regulatory changes with this amendment and there is a significant level of detail in the amendments that makes them challenging to review, we feel it is</p>	<p>See response to Comment No. 1.4</p>

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		<p>appropriate to provide a mechanism to correct any errors that are identified at a future date.</p> <p>Request: Include a provision that allows for identified mistakes to be corrected if identified and documented at a future date.</p>	
2.13	Calleguas WMP	Requests to modify the name format for clarification and consistency with Table 2-1	The commenter attached a table titled “Requested Modifications to Appendix 1 Inventory of Major Surface Waters and Waters to Which They are Tributary”. The majority of the requested modifications were to change the name format for clarification and consistency with Table 2-1. As discussed in response to Comment No. 2.12, the reference function of the Tributary Table justifies using a different format for names that facilitates alphabetical searches and simplifies the reaches beyond the segment detail used in Table 2-1. See also response to Comment No. 2.11.
2.14	Calleguas WMP	<p>Other modification requests:</p> <p>Black Canyon (18070030101): delete the Arroyo Simi tributary assignment.</p> <p>Calleguas Creek Reach 1 (180701030107): delete this entry, not in this HUC.</p> <p>Calleguas Creek Reach 2 (180701030105): delete this entry, not in this HUC.</p> <p>Lake Bard (Wood Ranch Reservoir) (180701030102): delete the Sycamore Canyon tributary assignment.</p>	<p>The table identified in response to Comment No. 2.13 also included other modification requests for specific waterbodies. Responses to these requests are as follows:</p> <p>The tributary assignment for Black Canyon will be deleted since there is no clear connection (per review of GIS information) with Arroyo Simi, which is the closest receiving water.</p> <p>Calleguas Creek Reach 1 is not in this HUC. This entry will be deleted.</p> <p>Calleguas Creek Reach 2 is not in this HUC. This entry will be deleted.</p> <p>This tributary assignment for Lake Bard will be deleted since there is no clear connection (per review of GIS information)</p>

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		<p>Tapo Canyon (180701030102): delete this entry, not in this HUC.</p>	<p>with Sycamore Canyon, which is the closest receiving water.</p> <p>Tapo Canyon is not in this HUC. This entry will be deleted.</p>
3.1	JG1	<p>We appreciate the Regional Board’s effort to update the Basin Plan. This letter is limited to a single comment that is pertinent to the Implementation Plan developed for Reach 1 (and Compton Creek). As the Implementation Plans have been developed, there have been communications between Regional Board staff and members of the JG1 Technical Committee that the upstream boundary of Reach 1 of the Los Angeles River is the confluence of Compton Creek. In addition, page A-10 (Tributary Tables) also shows Compton Creek as Tributary to Reach 1. The Implementation Plan for Reach 1 was developed and submitted to the Regional Board based on those communications.</p>	<p>Compton Creek has always been considered a tributary of Reach 1 of the Los Angeles River. However, “Upstream of Carson Street” has been used as the upper boundary of Reach 1 of the Los Angeles River as Carson Street is the most upstream major street before the Los Angeles River’s confluence with Compton Creek. The section of the Los Angeles River upstream of Carson Street falls within a different hydrologic unit and has different beneficial uses from the section downstream of Carson Street. However, Compton Creek has the same beneficial uses as the section of the Los Angeles River upstream of Carson Street, so there are no inconsistencies.</p>
3.2	JG1	<p>Figure 2-8 “Major Surface Waters of the Los Angeles River Watershed” shows the upstream boundary of Reach 1 at Carson Street (which does not actually cross the Los Angeles River). For clarity, we are requesting this boundary be moved approximately 2,500 feet north to the confluence with Compton Creek. A considerable effort has been made preparing the Implementation Plan on the basis of outfalls in that 2,500 feet being in the Reach 1 tributary area. Leaving Figure 2-8 as is would result in considerable confusion.</p> <p>It may be advantageous at this time to establish the upstream boundaries of Reach 1 to coincide with the current</p>	<p>See response to Comment No. 3.1. In the 1994 Basin Plan, beneficial uses were assigned based on the section of the Los Angeles River in the CalWater 1.0 hydrologic unit 405.12 above the estuary. The boundary of this hydrologic unit is approximately 0.4 mile downstream of the confluence with Compton Creek. The closest major cross street to the 405.12 hydrologic unit boundary is about 0.2 mile downstream at Carson Street, —which does not actually cross the river. As a result, on both the 303(d) list and TMDLs (including Resolution No. R09-003), Los Angeles River Reach 1 is defined as being from the estuary to Carson Street.</p> <p>The next upstream section of the Los Angeles River in the</p>

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		location of the sampling point listed at Del Amo Blvd. Please contact me to discuss the precise location.	1994 Basin Plan (CalWater 1.0 hydrologic unit 405.15) does not have the same beneficial uses as CalWater 1.0 hydrologic unit 405.12. The 1994 Basin Plan beneficial use designations are maintained throughout this update. Compton Creek has always been included as a tributary to Reach 1 of the Los Angeles River. The section of the Los Angeles River upstream of Carson Street falls within a different hydrologic unit and has different beneficial uses from the section downstream of Carson Street. However, Compton Creek has the same beneficial uses as the section of the Los Angeles River upstream of Carson Street, so there are no inconsistencies.
4.1	Los Angeles County & LACFCD	Thank you for the opportunity to comment on the proposed non-regulatory amendments to administratively update Chapter 2 "Beneficial Uses" of the Water Quality Control Plan for the Los Angeles Region (Basin Plan). The County of Los Angeles (County) and the Los Angeles County Flood Control District (LACFCD) appreciate the commitment of the Regional Water Quality Control Board, Los Angeles Region (Regional Board), to update the Basin Plan.	Comment noted.
4.2	Los Angeles County & LACFCD	The following comments are submitted on behalf of the County and the LACFCD. The addition of new waterbodies to the Basin Plan exceeds the scope of an "administrative" update and must go through the appropriate regulatory process The proposed Basin Plan Amendment (BPA) includes the addition of a newly revised tributary table which includes 661 newly identified waterbodies previously not set forth in the Basin Plan. We have attached as Exhibit 1 to these comments an Excel spread sheet provided by Regional Board staff identifying these new waterbodies (which are highlighted in gray).	The waterbodies referred to, while not explicitly identified as tributaries in the 1994 Basin Plan, by virtue of their existence already had all protections afforded by state and federal laws. These existing waterbodies were added to the tributary table as a result of the use of more detailed geographical data. These additions do not have any new regulatory implications and therefore are administrative in nature. The additions merely serve to enhance the utility of the Basin Plan by explicitly identifying by name tributaries to certain waterbodies listed in the beneficial use tables.

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4.3	Los Angeles County & LACFCD	<p>Identifying and incorporating new waterbodies into the Basin Plan requires a formal regulatory update of the Plan and should be addressed through a separate BPA in accordance with Section 305(b) of the Clean Water Act (CWA). The Staff Report states that "no new waterbodies were added to the beneficial use tables." However, we note that the so-called "tributary rule" applies beneficial uses to tributaries of listed waterbodies. We refer the Regional Board to Basin Plan page 2-4, which states that those waters not specifically listed in the beneficial use tables "are designated with the same beneficial uses as the streams, lakes, or reservoirs to which they are tributary. This is commonly referred to as the 'tributary rule'."</p> <p>In light of these facts, the County and LACFCD respectfully submit that the staff report's statement is incorrect. Moreover, the proposed BPA does not clearly distinguish waterbodies already in the Basin Plan from those being added, thus making the task of verifying the location and accuracy of the proposed new additions extremely difficult. We also note, as discussed in Comment III below, that the proposed BPA improperly removes the high flow suspension designation from several reaches of the Los Angeles River.</p> <p>In light of these facts, the County and the LACFCD request that the proposed BPA be revised to omit the newly identified tributaries. Such tributaries, and accompanying beneficial uses, should be the subject of regulatory amendment to the BPA.</p>	<p>See response to Comment No. 4.2. The Tributary Rule applies to all tributaries in the region, whether or not they are specifically identified in the Basin Plan. The inclusion of the newly named streams in the tributary table simply provides a more comprehensive Basin Plan and does not have any new regulatory implications.</p> <p>As such, the statement in the staff report that "no new waterbodies were added to the beneficial use tables" is correct. In addition, Finding 6 of the tentative resolution states that this proposed action does not "assign, modify, or delete beneficial use designations to any surface or ground waters within the region." Therefore, removal of the newly identified tributaries is not warranted.</p> <p>The additional waterbodies can be easily identified by comparing the updated Tributary Table provided in the public notice to the one contained in the 1994 Basin Plan. However, upon request for this information, the commenter was promptly provided with a list of the newly-included tributaries. The list has also been posted on the Regional Board's website.</p> <p>See below for specific responses to the comment related to the high flow suspension designation.</p>
4.4	Los Angeles County & LACFCD	<p>The Potential REC-1 Use for Ballona Creek Reach 1 and Reach 2 Is Not Appropriate and Should Be Removed. Table 2-1a of the proposed BPA retains the potential REC-1</p>	<p>Resolution No. 2005-0015 and the accompanying Basin Plan amendments have since gone through the approval process and are already a part of the Basin Plan. This administrative</p>

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		<p>beneficial use designation for Ballona Creek Reaches 1 and 2. In Resolution No. 2005-0015, the State Water Resources Control Board (State Board) specifically resolved to "remove the potential REC-1 beneficial use associated with the swimmable goal as expressed in the federal Clean Water Act Section 101(a)(2) for Ballona Creek [Reach 1]" and to "replace the potential REC-1 beneficial use for Ballona Creek to Estuary [Reach 2] with an existing Limited REC-1 use."</p>	<p>update accurately incorporates these previous amendments into the Basin Plan document. Therefore, comments on these amendments are outside the scope of this non-regulatory Basin Plan amendment to update Chapter 2 of the Basin Plan.</p> <p>Nevertheless, the potential REC-1 use for Reaches 1 and 2 of Ballona Creek , and the associated bacteria objectives, have been removed as they pertain to the “swimmable” aspect of the REC-1 designation. Footnote “au,” which is assigned to the potential REC-1 use in these reaches, makes this clear.</p>
4.5	Los Angeles County & LACFCD	<p>We recognize that the State Board's resolution referenced the "swimmable goal" for these reaches. Nevertheless, retaining the potential REC-1 use for the "fishable" goal does not logically follow. The REC-1 beneficial use is specifically tied to the protection of human health that might be harmed by the ingestion of water during water contact recreational activities and therefore protects a swimmable, but not fishable, goal. The Basin Plan defines the REC-1 beneficial use as follows:</p> <p>Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs. (Basin Plan, page 2-2)</p> <p>Thus, this beneficial use is tied to uses of water by humans, which is the "swimmable" goal mentioned in Clean Water Act (CWA) Section 101(a)(2). The statute makes clear the distinction between the "swimmable goal" and the "fishable goal":</p> <p>It is the national goal that wherever attainable, an interim goal of water quality which provides for the protection and propagation of fish, shellfish and wildlife [the "fishable goal"] and provides for recreation in and on the water [the "swimmable goal"]. 33 U.S.C. § 1251(a)(2) (emphasis</p>	<p>See response to Comment No. 4.4. Resolution No. 2005-005 and the accompanying Basin Plan amendment has gone through the approval process and is already part of the Basin Plan. Comments on the appropriateness of this amendment or any designated beneficial use are outside the scope of this administrative update.</p> <p>Nevertheless, staff note that retention of the “fishable” goal of the potential REC-1 use is a clear directive from State Board Resolution No. 2005-005, as evidenced from the accompanying Basin Plan Amendment language:</p> <p>“Amend the potential REC-1 use for “Ballona Creek” and “Ballona Creek to Estuary” by adding “au” beside the Ps” in the REC-1 column. Add the following footnote to Table 2.1 on p.2-10:</p> <p>au: The REC-1 use designation does not apply to recreational activities associated with the swimmable goal as expressed in the Federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use in the Basin Plan, or the associated bacteriological objectives set to protect those activities. However, water quality objectives set to protect other REC-1 uses associated with the fishable goal as expressed in the Federal Clean Water Act section 101 (a)(2) shall remain in effect for waters where the “au” note appears.”</p>

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		<p>supplied).</p> <p>The REC-1 beneficial use is indisputably aimed at the protection of humans who might be harmed by ingesting polluted water. The reference to "fishing" in the REC-1 use is intended to cover fishing methods involving body contact with water, such as fishing in a stream using waders. The bacteriological water quality objective for the REC-1 use is not applicable for the protection of aquatic life, including fish.</p>	<p>This language was approved by the USEPA in its final approval of the amendment to the Basin Plan.</p>
4.6	Los Angeles County & LACFCD	<p>Additionally, the Use Attainability Analysis performed by Regional Board staff, which led to the de-designation of the REC-1 beneficial use in these reaches, focused on the REC-1 beneficial use as a whole, not on a subset of the use tied to the "swimmable" goal. The "fishable" goal mentioned in the CWA is protected by separate beneficial uses and accompanying water quality objectives that protect aquatic life, such as the SHELL, WARM and COMM beneficial uses. For example, the WARM beneficial use (designated as a potential beneficial use for Ballona Creek) covers "[u]ses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates." Basin Plan, Page 2-2. For waters designated with the WARM beneficial use to protect aquatic life, the Basin Plan has water quality objectives for various constituents including ammonia, bioaccumulative substances, solids, dissolved oxygen, pH, etc. , but not bacteriological objectives.</p>	<p>See responses to Comment Nos. 4.4 and 4.5.</p>
4.7	Los Angeles County & LACFCD	<p>In light of these facts, the County and the LACFCD respectfully request that the potential REC-1 designation and proposed footnote "au" in the Basin Plan be removed. Alternatively, if the Board believes that the footnote should</p>	<p>See responses to Comment Nos. 4.4 and 4.5.</p> <p>Given the administrative nature of the Chapter 2 update, no modifications to previously adopted and approved regulatory</p>

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		<p>be retained, we suggest the following revised footnote (which also includes corrections from the language proposed in the Beneficial Use Tables in the proposed BPA) to be used in place of the "P" designation in the tables:</p> <p>The REC-1 use in the Basin Plan, and the associated bacteriological objectives set to protect that use, have been deleted in this reach. However, water quality objectives set to protect other applicable beneficial uses associated with the fishable goal as expressed in Federal Clean Water Act section 101(a)(2) shall remain in effect for waters where the (au) footnote appears.</p>	<p>language can be accommodated at this time.</p>
4.8	Los Angeles County & LACFCD	<p>The High Flow Suspension Provision and Footnote "av" Should be Clarified A similar comment applies to the "High Flow Suspension" provision and to proposed footnote "av." This suspension is applicable during high water conditions in lined engineered flood control channels and applies due to high flow conditions that make either full or incidental water contact dangerous. However, the definition of "High Flow Suspension" and footnote "av" continue to reference "other recreational uses associated with the fishable goal . . . and regulated under the REC-1 use." As noted above in Comment II, there are no "fishable goals" protected by the REC-1 use and reference to this use should be deleted.</p>	<p>The High Flow Suspension has since gone through the approval process and is already part of the Basin Plan. This administrative update accurately incorporates these previous amendments into the Basin Plan document. Therefore, comments on these amendments are outside the scope of this non-regulatory Basin Plan amendment to update Chapter 2 of the Basin Plan.</p> <p>Given the administrative nature of the Chapter 2 update, no modifications to previously adopted and approved regulatory language can be accommodated at this time.</p>
4.9	Los Angeles County & LACFCD	<p>In light of these facts, the County and the LACFCD propose that the language of these provisions be modified as follows:</p> <p>High Flow Suspension: The High Flow Suspension shall apply to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use,</p>	<p>See response to Comment 4.8. The language in Attachment A to the tentative Resolution, which the commenter proposes to be modified, was previously adopted by the Regional Board and has since gone through the approval process. Thus, the language in Attachment A to the tentative Resolution is already part of the Basin Plan. Comments concerning the appropriateness of any previously adopted Basin Plan</p>

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		<p>non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect those activities. Water quality objectives set to protect other applicable recreational uses associated with REC-2 uses (e.g. uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears in Table 2-1a. ... [remainder of provision is unchanged from that proposed in BPA]</p> <p>Footnote av: The High Flow Suspension only applies to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect these activities. Water quality objectives set to protect other applicable recreational uses associated with REC-2 uses (e.g. uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.</p> <p>In both cases, the language has been modified to remove the erroneous statement concerning other recreational uses associated with the fishable goal "and regulated under the REC-1 use."</p>	<p>amendment are outside the scope of this action. The purpose of this administrative update is to accurately incorporate all previously adopted and approved amendments into the Basin Plan. The modifications suggested by the commenter are therefore not timely for this non-regulatory action.</p>
4.10	Los Angeles County & LACFCD	<p>Additionally, the revised Beneficial Use Tables fail to apply the high flow suspension to various reaches of the Los Angeles River that were identified for such treatment in Resolution 2003-010 and which fit the definition of a reach requiring such suspension under the resolution. These are Reach 3 (Figueroa Street to Riverside Drive), which is a soft-bottom channel lined on both sides with concrete;</p>	<p>Staff agree. The Beneficial Use tables will be revised to correct these omissions prior to consideration by the Regional Board. Revisions to the applicable documents in response to these comments will be made available prior to the Board meeting.</p>

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		Reach 4 (Sepulveda Dam to Riverside Drive), which is comprised both of soft-bottom channels lined with concrete and concrete-lined and concrete-bottom channels; and, Reach 6 (above Balboa Blvd.), which is composed of a small section of concrete-lined soft bottom channel, with the remainder composed of concrete-lined channels.	
4.11	Los Angeles County & LACFCD	<p>Other Comments</p> <p>a. Table 2-1a: The description for footnote "m" shall be corrected as follows: "Access prohibited by Los Angeles County Department of Public Works in the concrete-channelized areas." Also, please see Comment IV.b., which suggests that a new footnote reading, "Access prohibited by Los Angeles County Department of Public Works" should be used in place of this footnote.</p> <p>b. Table 2-1a: The difference between footnotes "m" ("Access prohibited by Los Angeles County Department of Public Works in the concrete-channelized areas") and "s" ("Access prohibited by Los Angeles County DPW") is unclear and confusing. To make the Basin Plan clearer for users, we suggest that a single footnote "m" reading, "Access prohibited by Los Angeles County Department of Public Works" be utilized in place of existing footnotes "m" and "s."</p>	Footnote "m" will be revised to expand the abbreviation "DPW" to "Department of Public Works" as suggested by the commenter. However, the new footnote suggested by the commenter cannot replace the existing footnote as it does not specify that access is prohibited in the concrete-channelized area. There are some reaches where access is prohibited along their entire length, and others where access is prohibited only in the concrete-channelized areas. Footnotes "m" and "s" are thus provided to make the distinction between these two conditions.
4.12	Los Angeles County & LACFCD	<p>c. Table 2-1 Page 2-7: The text of footnote "c" needs to be added; we understand that no changes to this text are proposed in the BPA.</p> <p>d. Table 2-1 Page 2-8: The text of footnote "j" needs to be added; we understand that no changes to this text are proposed in the BPA.</p>	The omissions identified by the commenter will be corrected in the applicable documents prior to consideration by the Board. Revisions to the applicable documents will be made available prior to the Board meeting.

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4.13	Los Angeles County & LACFCD	e. Table 2-1 Page 2-11: Footnote "au" should be removed; please see discussion in Comment II, above.	Please see response to Comment No. 4.4.
4.14	Los Angeles County & LACFCD	<p>f. Table 2-1 Page 2-12: In footnote "s," County is erroneously spelled as "Count." Also, please see Comment IV.b above, suggesting deletion of this footnote.</p> <p>g. Table 2-1a: Footnote for * Asterisked MUN should be moved from Page 2-17 to 2-23.</p> <p>h. Table 2-1a Page 2-18: The text of footnote "j" needs to be added; we understand that no changes to this text are proposed in the BPA.</p> <p>i. Table 2-1 a Page 2-24: The test of footnote "k" needs to be added; we understand that no changes to this text are proposed in the BPA.</p>	<p>The spelling error will be corrected. Also, see response to Comment No. 4.11.</p> <p>The errors in Table 2-1a identified by the commenter will be corrected in the applicable documents prior to consideration by the Board. Revisions to the applicable documents in response to these comments will be made available prior to the Board meeting.</p>
4.15	Los Angeles County & LACFCD	j. Figure 2-22: The areas of the Alamitos jetty and San Gabriel River jetty need to be correctly digitized. (Please see aerial map of the area).	Figure 2-22 will be edited to include a depiction of the entire extensions of these jetties into the harbor.
5.1	City of Oxnard	<p>This letter is in response to the August 19, 2011 Notice of Proposed Non-regulatory Amendments to Administratively Update Chapter 2: "Beneficial Uses" of the Basin Plan. The City has no comments on the Proposed Basin Plan Amendment; however, since the staff report states that the United States Geological Survey (USGS) National Hydrography Dataset (NHD) "was the primary reference for surface water geography," we would like to provide the following comments on the data set:</p> <p>The NHD includes a Geographic Information System (GIS) layer for hydrologic units (with a ten digit code). Most of the City of Oxnard is within the McGrath Lake-Frontal Pacific Ocean (1807010302). This nomenclature for the</p>	<p>The National Hydrologic Dataset was the primary source for surface water geography for the mapping of waterbodies including streams, channels, and lakes. The Watershed Boundary Dataset (WBD) was used for mapping hydrologic units.</p> <p>Staff did not use the hydrologic unit layer from the NHD. As stated in the staff report, the WBD was used for hydrologic units. The WBD includes a 12-unit hydrologic unit code that breaks the areas into subwatersheds. Staff is aware that there</p>

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		hydrologic unit is inconsistent with the Basin Plan (Santa Clara-Calleguas Hydrologic Unit), and its boundaries are incorrect. The City recommends reconciling the data set with drainage area maps submitted under the Municipal Separate Storm Sewer System (MS4) permit for Ventura County.	<p>are some differences in the boundaries between the NHD and WBD datasets. As the WBD is currently used by the EPA and will soon be used by the State Water Board, it is the logical layer of choice for the area covered by the Los Angeles Regional Board.</p> <p>Most of the City of Oxnard is within hydrologic unit 180701030201 of the WBD, which is labeled “McGrath Lake-Frontal Pacific Ocean”. This is a subwatershed in the area of the Santa Clara-Calleguas Hydrologic Unit referenced in Chapter 1 of the Basin Plan. It is therefore more specific, but not inconsistent.</p> <p>The NHD for waterbody features and the WBD for hydrologic units were used to be consistent with EPA and the State Water Board. The maps submitted for the MS4 do not represent a standard GIS layer and were therefore not utilized for reconciling the data.</p>
5.2	City of Oxnard	The NHD includes a GIS layer for Flowline. Most of the waterbodies are mislabeled StreamRiver, when they are actually stormwater conveyance systems that are part of our permitted MS4. The City recommends reconciling the Flowline GIS layer with the drainage maps submitted under the MS4 permit for Ventura County.	<p>Staff used the NHD Flowline layer for mapping the waterbodies. The only attribute fields considered from this layer were “GNIS_Name” and “ReachCode”. There are a number of other attribute fields that come with these datasets including “FType” that uses the designation “StreamRiver”. These other attribute fields were not considered during this update as some of the information is incomplete and/or contains inaccuracies. The USGS process for assembling these data sets was reliable for locating these features but insufficient for comprehensively assigning detailed attributes. Local expertise would be needed to populate the additional attribute fields with accurate properties.</p> <p>Hydromodified stream channels are included in the GIS layer because they are part of stream systems within their watersheds and support a variety of beneficial uses.</p>

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			<p>The NHD for waterbody features and the WBD for hydrologic units were used to be consistent with EPA and the State Board. The maps submitted for the MS4 do not represent a standard GIS layer and were therefore not utilized for reconciling the data.</p>
5.3	City of Oxnard	<p>The staff report states that the Oxnard Industrial Drain is missing. It is included in the NHD Flowline GIS layer as Reach Code 18070103000565, but incorrectly mapped. It is also mislabeled as a StreamRiver. The Oxnard Industrial Drain is a stormdrain conveyance feature, that was originally a ditch constructed in the late 1800's to transport sugar beet processing waste to the ocean. It is now part of the regional MS4. The City recommends reconciling the Flowline GIS layer with the drainage maps submitted under the MS4 permit for Ventura County.</p>	<p>The staff report indicated that the Oxnard Industrial Drain was “missing” because it was not identified in the “GNIS_Name” field of the NHD Flowline layer. Staff has remapped and labeled the Oxnard Industrial Drain using aerial imagery and information from the Ventura County Watershed Protection District (<i>HDR Engineering Inc., 2011</i>) as reference. Figure 2-1, which depicts the Oxnard Industrial Drain, will be corrected accordingly. This correction does not necessitate any changes to the tables.</p> <p>Dating back to 1870, the area where the Oxnard Industrial Drain is located was a slough draining into a salt pond. It has since been repurposed as an engineered channel (<i>San Francisco Estuary Institute, 2011</i>).</p> <p>See also response to Comment No. 5.2.</p> <p><i>References cited:</i> <i>HDR Engineering, Inc. 2011. Recirculated Draft Environmental Impact Report: J Street Drain Project, Ventura County, California. Irvine, CA.</i></p> <p><i>San Francisco Estuary Institute. 2011. History Ecology of the lower Santa Clara River, Ventura River, and Oxnard Plain: an analysis of terrestrial, riverine, and coastal habitats. Oakland, CA.</i></p>
5.4	City of	The staff report states that the "update to Chapter 2 of the	See responses to Comments No. 5.1 and 5.2.

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	Oxnard	Basin Plan is non-regulatory in nature and does not involve changes to beneficial use definitions." Since the NHD is assigning labels of StreamRiver to stormdrain conveyance systems, there is justifiable concern that these conveyances could be then viewed as Waters of the United States, with all of the consequent regulatory impacts. Additionally, if the NHD is used for defining hydrologic units, there are associated concerns about the impacts to Total Maximum Daily Loads (TMDL), interpretation of off-site mitigation area hydrologic units, as defined in the MS4 permit, and future options for dry-weather diversions. The City recommends that the Regional Board reconcile all GIS layers to documents submitted as a part of the Ventura County MS4, in order to properly label features of the MS4 and avoid misidentifying them as Waters of the United States.	
5.5	City of Oxnard	Again, we have no comments on the proposed Basin Plan Amendment, but have concerns about the apparent reliance on the USGS data to make administrative changes to the Plan as possibly setting a precedent for future changes.	<p>Comment noted. See response to Comments Nos. 5.1 through 5.3.</p> <p>As stated previously, the GIS references used for this update were selected for consistency with that used by state and federal agencies. As state stewardship of GIS data increases, the quality of these layers will continue to improve, allowing them to serve as the best available resource.</p>
6.1	City of Los Angeles	On August 19, 2011, the California Water Quality Control Board Los Angeles Region (Regional Board) released the Proposed Non-Regulatory Amendments to Administratively Update Chapter 2: "Beneficial Uses" of the Basin Plan. The City's Bureau of Sanitation (Bureau) appreciates the opportunity to provide comments on the amendments. Although the Bureau believes the amendments will bring much needed clarity to this chapter of the Basin Plan, we have identified a number of potential errors and typos that	<p>The typographical and other errors noted by the commenter will be corrected in the draft documents prior to consideration by the Regional Board. Corrections of such errors, however, do not constitute substantive changes that require recirculation of the draft documents for another public comment period. Revised tentative versions of the proposed Basin Plan Amendment based on comments received will be made available to the commenter and other interested persons prior to the Board meeting.</p>

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		<p>should be corrected. The Bureau requests that the revised Basin Plan Amendment be re-noticed to allow for stakeholder review prior to the adoption of the amendments.</p>	
6.2	City of Los Angeles	<p>The following is a discussion of the Bureau's requested modifications.</p> <p>1 - Asterisked Municipal Drinking Water Beneficial Uses The Regional Board staff may have erred during incorporation of the Basin Plan Amendment for dedesignation of the MUN beneficial use from portions of the West Basin groundwater basin verbiage. The Bureau believes that the language modifications to Chapter 2 Beneficial Uses for Specific Waterbodies could result in regulatory impacts to dischargers that are beyond the scope of the adopted Basin Plan Amendment. In particular, the language that was deleted from this section should be retained. The Basin Plan Amendment that is being incorporated was specific to the designation of MUN beneficial uses for specific groundwater basin areas and should not be used to modify the broader language regarding the MUN beneficial use in this section.</p> <p>Request: The Bureau requests that the following stricken language from the 1994 Basin Plan be reinstated in the Basin Plan Amendment:</p> <p><i>"While supporting the protection of all waters that may be used as a municipal water supply in the future, the Regional Board realizes that there may be exceptions to this policy.</i></p> <p><i>In recognition of this fact, the Regional Board will soon implement a detailed review of criteria in the State Sources of Drinking Water policy and identify those waters in the Region that should be excepted from the MUN designation. Such exceptions will be proposed under a special Basin Plan Amendment and will apply exclusively to those waters</i></p>	<p>The language referenced by the commenter has been reinstated in the Basin Plan. Also see response to Comment No. 1.9.</p>

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		<p><i>designated as MUN under SB Res. No. 88-63 and RB Res. No. 89-03.</i></p> <p><i>In the interim, no new effluent limitations will be placed in Waste Discharge Requirements as a result of these designations until the Regional Board adopts this amendment."</i></p>	
6.3	City of Los Angeles	<p>2 - Application of High-flow Suspension of Recreational Uses</p> <p>The Bureau has reviewed the incorporation of the High-flow Suspension (HFS) Basin Plan Amendment into Table 2-1a and feels that there are a number of errors that should be corrected.</p> <p>In the Basin Plan Amendment adopting the HFS (Resolution No. 2003-010), a table was included to define where the HFS applied.</p> <p>According to Table 2-1 Cross Reference table for Inland Surface Waters, Los Angeles River Reaches 3, 4, 5, and 6 all correspond to the entry for Los Angeles River 405.21 in the 1994 Basin Plan and HFS Amendment. As a result, the entry for Los Angeles River 405.21 that includes the HFS designation should be included for Los Angeles Reaches 3, 4, 5, and 6 in Table 2-1a. Beneficial Uses of Inland Surface Waters.</p> <p>Request: Add Y^{av} to the High flow Suspension Column in Table 2-1a for Los Angeles River Reaches 3, 4, 5 and 6 to appropriately apply the following footnote to these reaches:</p> <p>"The High- flow Suspension only applies to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact</p>	<p>The High Flow Suspension designation has been assigned to Reaches 3, 4, 5, and 6 of the Los Angeles River. Revised beneficial use tables reflecting these changes will be made available to the commenter and other interested persons prior to the Board meeting.</p>

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		<p>water recreation involving incidental contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect those activities. Water quality objectives set to protect (1) other recreational uses associated with the fishable goal as expressed in the federal Clean Water Act section 101(a) (2) and regulated under the REC-1 use and (2) other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (ad) footnote appears..."</p>	
6.4	City of Los Angeles	<p>3 - Other Potential Errors</p> <p>Although the Bureau did not have the resources to review all of the tables in complete detail at this time, we did identify a number of other potential errors in the proposed Basin Plan Amendment as follows:</p> <ul style="list-style-type: none"> • Los Angeles is spelled as "Los Angelels" throughout the tables and document and should be corrected. • Table 2-1a • Footnote au references footnote (ac) which does not exist in the table. • Footnote av references footnote (ad) which does not exist in the table. • Footnote au appears to be incomplete and not consistent with the Basin Plan Amendment (pg. 2). • Devils Gate Reservoir (lower) is missing from the table. • Beneficial uses for Aliso Canyon Creek (above State Hwy 118) are missing. • Haines Canyon Channel and Creek should be Haines Canyon Creek to match the cross reference table and HFS Amendment. <p>Table 2-1 Cross Reference Table for Inland Surface Waters</p>	<p>The errors identified by the commenter have been corrected. Staff has conducted a thorough review of all the tables and has made corrections to all errors and omissions noted in the process. Revised documents reflecting these changes will be made available to the commenter and other interested persons prior to the Board meeting.</p>

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		<ul style="list-style-type: none"> • The table number is the same as Table 2-1 Beneficial Uses of Inland Surface Waters. This creates some confusion and we would suggest renaming this table for clarity. • Rubio Canyon and Eaton Wash are not listed in the table, but are included in other tables. • Eaton Wash (below dam) which corresponds to Eaton Wash (below dam) (Eaton Dam to Rio Hondo Reach 3) appears to have the incorrect Hydrologic Unit reference. It should be 405.31 rather than 405.41. • Kagel Canyon Creek is misspelled as Kegel Canyon Creek 	
6.5	City of Los Angeles	<p>The Bureau requests, based on the identification of these errors and errors that other agencies have identified, that Regional Board staff conduct a thorough review of the proposed amendments for additional errors and re-notice the proposed amendments and supporting information (including GIS layers and/or maps that show the relationship between the new and old waterbody designations) with sufficient time to review the amendments in their entirety.</p>	<p>A thorough review of the documents has been conducted and errors and omissions identified have been corrected. Corrections of such errors, however, do not constitute substantive changes that require recirculation of the draft documents for another public comment period. Revised tentative versions of the proposed Basin Plan Amendment based on comments received will be made available to the commenter and other interested persons prior to the Board meeting.</p> <p>Also, the cross reference tables provided show a clear relationship between the new and old waterbody designations. In addition, versions of the GIS data layers staff used and relied on in preparing the updates to the Chapter 2 maps and tables have been made available to the public via our website.</p>
6.6	City of Los Angeles	<p>Lastly, the Bureau requests that a qualifying provision be added to the Basin Plan Amendment that allows for identified mistakes to be corrected if identified and documented at a future date. Since the Regional Board's intent is not to make any regulatory changes with this amendment and there is a significant level of detail in the amendments that makes them challenging to review, we feel</p>	<p>The tentative Resolution for the proposed update allows for non-substantive changes to be made to the amendment after Regional Board adoption, as it goes through the approval process (see Finding No. 15 and Resolve No. 6 of the Tentative Resolution). For any additional errors noted after final approval, there will be opportunity to make corrections during the administrative updates of the remaining chapters of</p>

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		<p>it is appropriate to provide a mechanism to correct any errors that are identified at a future date.</p> <p>Request: Revise and re-notice the Basin Plan Amendment and supporting documentation and include a provision that allows for identified mistakes to be corrected if identified and documented at a future date.</p>	<p>the Basin Plan that are scheduled to occur in phases through summer 2012. In addition, corrections of this nature could be made by the Regional Board at any time, either separately or as part of some other Basin Plan amendment.</p>
7.1	Theresa Jordan	<p>The following are my comments on the aforementioned subject for the Board's consideration.</p> <p>#1 - Page 2-35, Figure 2-4. Major surface waters of the Calleguas-Conejo Creek watershed. Capitalize "surface", "waters", and "watershed" to be consistent with "Major", and "Calleguas-Conejo Creek".</p> <p>To number 8(Tapo Canyon) of the surface waters list add "Creek".</p> <p>To "Gillibrand Canyon" on the map add "Creek".</p>	<p>The titles of the maps are worded to correspond with the figures from the 1994 Basin Plan that are being updated. Therefore, the format of the titles will be left the same for consistency.</p> <p>The description of Reach 8 on Figure 2-4 will be edited to add the word "CREEK" after "TAPO CANYON".</p> <p>The label of Gillibrand Canyon will be edited to include the creek designation.</p>
7.2	Theresa Jordan	<p>#2 - Page 2-43, Figure 2-12. Ventura Central Groundwater Basins.</p> <p>To the square for "Area represented by the figure" add "Ventura County/Los Angeles County Line".</p> <p>On the map, to "Hooper Cyn" add "Creek";</p> <p>To "Oxnard" add "Plain"; to "Conejo", add "Valley"; add the "Gillibrand Basin"; and</p> <p>Add "Lake Bard"</p>	<p>The County Line will be added to the inset maps for the groundwater basin maps.</p> <p>The label of Hopper Canyon will be edited to include the creek designation.</p> <p>The Oxnard and Conejo basins have been labeled with the names assigned by DWR and will be left the same. Staff does not have a GIS delineation of the Gillibrand Basin.</p> <p>Lake Bard will be added to the map.</p>