Exhibit A

October 27, 2014

East San Gabriel Valley Watershed
Management Group
(See Distribution List)

REVIEW OF THE EAST SAN GABRIEL VALLEY WATERSHED MANAGEMENT GROUP'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear East San Gabriel Valley Watershed Management Group:

The Regional Water Board has reviewed the draft WMP that the East San Gabriel Valley Watershed Management Group (ESGV WMG) submitted on June 27, 2014 for the East San Gabriel Valley Watershed Management Area. The participants of the ESGV WMG are the Cities of Claremont, La Verne, Pomona and San Dimas (the ESGV Cities). This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County Permit and must be approved by the Regional Water Board.

As stated above, on June 27, 2014, the ESGV WMG submitted a draft Watershed Management Program (WMP) for the East San Gabriel Valley Watershed Management Area (WMA) to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of LA County MS4

Permit. However, some revisions to the ESGV Cities' draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2, respectively. The specific Permit provisions cited in the enclosures refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which revisions to the draft WMP can be addressed (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Water Board comments, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program.

Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than January 27, 2015.

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft East SGV WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov.

If the necessary revisions are not made, the ESGV Cities will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment Q pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft East SGV WMP is approved, the Cities are required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii);
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters; and
(d) Implement watershed control measures, where possible from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash water quality-based effluent limits (WQBELs) and all other WQBELs and receiving water limitations by the applicable compliance deadlines occurring prior to approval of a WMP.

In addition on June 27, 2014, the East San Gabriel Valley River Watershed Management Group submitted a draft Coordinated Integrated Monitoring Program (CIMP) for the East San Gabriel WMA to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Chief Deputy E.O. for

Samuel Unger, P.E.
Executive Officer

Enclosures:

Attachment 1 Comments and Necessary Revisions to Draft WMP
Attachment 2 Comments on Reasonable Assurance Analysis for the East San Gabriel Valley Watershed Management Group

cc: Bronwyn Kelley, PG, Project Manager MWH

Los Angeles Regional Water Quality Control Board

Attachment to October 27, 2014 Letter Regarding the East San Gabriel Valley Watershed Management Group's Draft Watershed Management Program (WMP) Submittal Pursuant to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Comments and Necessary Revisions to Draft WMP

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.a.ii. Waterbody-Pollutant Classification (page 59)	• Greater detail on the water quality characterization, including (1) a map of the locations of the monitoring sites for each of the four sources of data identified on page 7 relative to the watershed management area, and (2) a tabular summary of the data should be provided. • In Section 5.1.4, the data used to establish existing concentrations should be described in more detail and presented in tabular form. Additionally, Table 5-2 appears to omit from the analysis San Jose Creek. Discharges to San Jose Creek are subject to a dry-weather water quality-based effluent limitation (WQBEL) for selenium; therefore, data on existing concentration should be included for San Jose Creek. • The MS4 permit requires WMPs to include the applicable WQBELs for every approved TMDL within the WMA. The draft WMP does not include the WQBELs for Puddingstone Reservoir for total phosphorus and total nitrogen, total mercury, and PCBs, chlordane, dieldrin, total DDT and 4,4-DDT. • The WMP needs to address all applicable WQBELs to comply with provisions of Part VI.E and Attachment P related to the Los Angeles Lakes TMDLs (specifically, Puddingstone Reservoir for nitrogen, phosphorus, mercury, PCBs, chlordane, dieldrin and DDT compounds). Attachment P identifies wasteload allocations for each of the four municipalities in the ESGV WMG and states these are to be measured at the point of discharge into the receiving waters. Also, if implementation will take more than one year, then interim milestones and dates for their achievement must also be included. • The WMP needs to specify the applicable receiving water limitations for Category 3 waterbody-pollutant combinations (WBPCs).
Part VI.C.5.a.iv. Prioritization (page 60)	• The WMP needs to provide a clear schedule that demonstrates implementation of the BMPs will achieve the required interim metal reductions by the compliance deadlines. Whereas Tables 5-6 through 5-9 present the type of structural BMPs to be implemented by each City, there are no specific dates for installation; the WMP schedule should describe timelines through 2022.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64)	• The WMP proposes to increase frequency of construction site inspections although this appears to apply only for City of San Dimas. The WMP should either increase such frequency for other Cities or provide rationale for no changes for the other cities of the ESGV WMG. The WMP also proposes to require inventory of existing developments for future BMP retrofits; however no timeframe is included. • The draft RAA addresses WBPCs for the San Gabriel Metals TMDLs; however the RAA does not address activities and control measures to address selenium in San Jose Creek Reach 2, nor pollutants in the Puddingstone Reservoir TMDLs. Greater clarity should be provided on the volume based approach taken by the ESGV WMG. • Activities and control measures for Category 3 WBPCs for Walnut Creek Wash and San Gabriel River Reach 2 and Reach 3 are not included. To the extent that the group intends to address these through the volume based approach, this should be more clearly stated in the WMP. • The RAA identifies potential areas for green street conversion and assumes a 30% conversion of the road length in the suitable areas; however, the specific locations and projects are not identified. Although it may not be possible to provide detailed information on specific projects at this time, the WMP should at least specify the number of projects needed to ensure timely compliance with permit requirements. • The draft WMP assumes a 10% pollutant reduction from new non-structural controls. Although 10% is a modest fraction of the overall controls necessary, additional support for this assumption should be provided, or as part of the adaptive management process, the Permittees could commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not warranted. •

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5) Reasonable Assurance Analysis (pages 63-64)	• The draft WMP, including the RAA, excludes stormwater runoff from "non-MS4" facilities within the WMA from the stormwater treatment target. In particular, industrial facilities that are permitted by the Water Boards under the Industrial General Permit or an individual stormwater permit were identified and subtracted from the treatment target. Regional Water Board staff recognizes that this was done with the assumption that these industrial facilities will retain their runoff and/or eliminate their cause/contribution to receiving water exceedances, as required by their respective NPDES permit. However, it is important that the Group's actions under its Industrial/Commercial Facilities Program—including tracking critical industrial sources, educating industrial facilities regarding BMP requirements, and inspecting industrial facilities—ensure that all industrial facilities are implementing BMPs as required. • The draft WMP, including the RAA, takes a similar approach for areas under the jurisdiction of the California Department of Transportation (Caltrans). Caltrans facilities that are permitted under the Caltrans MS4 permit (Order No. 2012-0011-DWQ) were also identified and subtracted from the treatment target. It should be noted that the Amendment to the Caltrans Permit (Order WQ 2014-0077-DWQ) includes provisions to address TMDL requirements throughout the state. Revisions to Attachment IV of the Caltrans Permit require that Caltrans prioritize all TMDLs for implementation of source control measures and BMPs, with prioritization being "consistent with the final TMDL deadlines to the extent feasible." Additionally, the Caltrans Permit also includes provisions for collaborative implementation through Cooperative Implementation Agreements between Caltrans and other responsible entities to conduct work to comply with a TMDL. By contributing funds to Cooperative Implementation Agreements and/or the Cooperative Implementation Grant Program, Caltrans may receive credit for compliance units, which are needed for compliance under the Caltrans Permit. In a similar manner, the LA County MS4 Permit includes provisions for Permittees to control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other MS4 owners—such as Caltrans—to successfully implement the provisions of the Order (see Parts VI.A.2.a.viii and VI.A.4.a.iii). Therefore, the Group should ensure that it is closely

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
	coordinating with appropriate Caltrans District staff regarding the identification and implementation of watershed control measures to achieve water quality requirements (i.e. applicable Receiving Water Limitations and WQBELs).

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

TO: East San Gabriel Valley Watershed Management Group
(See Distribution List)

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 24, 2014

SUBJECT: COMMENTS ON SECTION 5, REASONABLE ASSURANCE ANALYSIS AND WATERSHED CONTROL MEASURES OF THE DRAFT WATERSHED MANAGEMENT PROGRAM FOR THE EAST SAN GABRIEL VALLEY WATERSHED MANAGEMENT AREA

This memorandum contains comments on Section 5, Reasonable Assurance Analysis of the draft Watershed Management Program (WMP), dated June 27 2014, which was submitted by the East San Gabriel Valley Watershed Management Group.

A. General comments on the draft Reasonable Assurance Analysis (RAA) section of the Watershed Management Program.

   The required reductions for dry weather were calculated based on the median and the 90th percentile existing concentrations in Section 5.1.4 of the WMP. Specific required reductions for Thompson Creek, San Dimas, and Puddingstone Reservoir were listed in Table 5-2 on page 42 of the draft WMP. However, the required reductions for dry weather for San Jose Creek were not included in the table. The WMP should be revised to include the required reductions for identified priority pollutants for San Jose Creek.

B. Modeling comments regarding analysis of runoff volumes based on the 85th percentile, 24-hour design storm:

   1. The predicted runoff volumes presented in Figure 5-12 and Table 5-1 should be presented and explained in more detail to provide clarity on how those values were obtained from the hourly model output results of runoff volume over the 24-hour design event for each subwatershed or city-subwatershed.

   2. The report did not describe how the model was calibrated, including calibration results compared to calibration criteria in Table 3.0 of the RAA Guidelines, and no historical hydrology data were used for comparison with the model results for the baseline prediction. According to Part G, pages 12-13 of the RAA Guidelines, model calibration is necessary to ensure that the model can properly assess all the variables and conditions in a watershed system. The hydrology calibration is particularly important in the case of the East San Gabriel Valley RAA, since the group is used a volume-based approach.

3. The report presents the existing runoff volumes and required volume reductions to achieve the 85th percentile, 24-hour volume retention standard for each watershed area. The report needs to present the same information, if available, for non-stormwater runoff. Alternatively, the report should include a commitment to collect the necessary data in each watershed area, through the non-stormwater outfall screening and monitoring program, so that the model can be re-calibrated during the adaptive management process to better characterize non-stormwater flow volumes and to demonstrate that proposed volume retention BMPs will capture 100 percent of non-stormwater that would otherwise be discharged through the MS4 in each watershed area.

4. The index of subwatersheds shown in Figure 5-15 does not match that used in the model input file. The ID numbers for 67 subwatersheds from the model input file (and the correspondence of these 67 subwatersheds to the 98 city-subwatersheds) must be provided and be shown in the simulation domain to present the geographic relationship of these subwatersheds and city-subwatersheds that are simulated in the LSPC model.

5. In the analysis of the required reduction for lead, zinc, selenium and E. coli under the dry weather condition, more detailed information about the baseline condition for 50th and 90th percentile existing concentration presented in Table 5-2 should be provided.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

October 27, 2014

Ms. Gail Farber, Director
County of Los Angeles
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

Ms. Gail Farber, Chief Engineer
Los Angeles County Flood Control District
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

REVIEW OF THE ALAMITOS BAY/LOS CERRITOS CHANNEL WATERSHED MANAGEMENT AREA DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Ms. Farber:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 30, 2014 by the County of Los Angeles and Los Angeles County Flood Control District for the Alamitos Bay/Los Cerritos Channel Watershed Management Area. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of storm water and non-storm water to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County Permit and must be approved by the Regional Water Board.

As stated above, on June 30, 2014, the County of Los Angeles (County) and the Los Angeles County Flood Control District (LACFCD) submitted a draft Watershed Management Program (WMP) for the Alamitos Bay/Los Cerritos Channel (AB/LLC) Watershed Management Area (WMA) to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

Subsequent to submittal of the draft WMP, Regional Water Board staff met with the County and LACFCD on September 15, 2014, to discuss the AB/LLC WMP.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit for the 95-acre County Island within the AB/LCC WMA. However, some revisions to the County's and LACFCD's draft WMP are necessary, including additional analyses related to the remainder of the subwatershed areas addressed by the draft WMP, which includes the Los Cerritos Channel Estuary, Colorado Lagoon, Alamitos Bay and San Pedro Bay. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP and the Reasonable Assurance Analysis, are found in Enclosure 1 and Enclosure 2, respectively. The specific Permit provisions cited in the enclosures refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Water Board comments, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 27, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft AB/LLC WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Rebecca.Christmann@waterboards.ca.gov.

If the necessary revisions are not made, the County and the LACFCD will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachments N and Q pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft AB/LLC WMP is approved, the County and LACFCD are required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii); and
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters.
(d) Implement watershed control measures, where possible from existing TMDL implementation plans, to ensure that MS4 discharges are achieving compliance with interim WQBELs for the Colorado Lagoon TMDL and the Harbors Toxics TMDL pursuant to Part VI.E and set forth in Attachments N and Q consistent with the compliance deadline of December 28, 2012.

In addition on June 30, 2014, the County and the LACFCD submitted a draft Coordinated Integrated Monitoring Program (CIMP) for the AB/LLC WMA to the Regional Water Board

pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Ms. Rebecca Christmann of the Storm Water Permitting Unit by electronic mail at Rebecca.Christmann@waterboards.ca.gov or by phone at (213) 576-5734. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

cc: Angela George, Los Angeles County Flood Control District
Jolene Guerrero, County of Los Angeles, Department of Public Works
Bill Johnson, County of Los Angeles, Department of Public Works

Enclosures: Summary of Comments and Required Revisions
Memorandum on Reasonable Assurance Analysis

Attachment to October 27, 2014 Letter Regarding the Alamitos Bay/Los Cerritos Channel Watershed Management Area Draft Watershed Management Program, Pursuant to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Summary of Comments and Required Revisions to the Draft Watershed Management Program

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
Part VI.C.5.a.i Water Quality Characterization	The geographical scope of this WMP includes both the 95-acre County Island and LACFCD infrastructure in the Los Cerritos Channel freshwater subwatershed as well as the LACFCD infrastructure within the Los Cerritos Channel Estuary subwatershed and the Alamitos Bay subwatershed. Therefore, the WMP needs to present and evaluate water quality data for the Los Cerritos Channel Estuary, Colorado Lagoon, Alamitos Bay and San Pedro Bay, if available. Monitoring data that should be evaluated in the revised WMP include TMDL monitoring data for the Colorado Lagoon; bacteria data for Alamitos Bay; Bight data for San Pedro Bay; SWAMP data for Los Cerritos Channel Estuary; and any other data from CEDEN for Los Cerritos Channel, Los Cerritos Channel Estuary, Alamitos Bay and San Pedro Bay. It appears that the data for diazinon during wet weather may be missing from Table 1 on page B-3.
Parts VI.C.5.a.ii(1) and iv(1) Water Body-Pollutant Classification	The WMP needs to address the copper dry weather waste load allocation. Copper is listed in Table 3 as a Category 1 pollutant during both wet and dry conditions, but does not appear to be further addressed in the WMP, including the RAA. The WMP needs to identify the interim and final compliance deadlines of September 30, 2023 for the wet weather waste load allocation and dry weather waste load allocation, respectively. In addition, the WMP needs to include and address in the RAA all applicable water quality-based effluent limitations (WQBELs) to comply with provisions of Part VI.E and Attachment Q related to the Colorado Lagoon OC Pesticides, PCBs, Sediment Toxicity, PAHs and Metals TMDL and Attachment N related to the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL, which apply to the LACFCD for direct discharges to Colorado Lagoon and San Pedro Bay, respectively. In Section 2.2, the draft WMP states, "As recognized by the footnote in Attachment K-7 of the Permit, the County and the

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
	LACFCD have entered into an Amended Consent Decree with the United States and the State of California, including the LARWQCB, pursuant to which the LARWQCB has released the County and the LACFCD from responsibility for Toxic pollutants in the Dominguez Channel and the Greater Harbors." This statement misinterprets the Regional Water Board's findings. Footnote 1 to Table K-7 of the LA County MS4 Permit states, "The requirements of this Order to implement the obligations of this TMDL do not apply to a Permittee to the extent that it is determined that the Permittee has been released from that obligation pursuant to the Amended Consent Decree entered in United States v. Montrose Chemical Corp., Case No. 90-3122 AAH (JRx)." As stated in the responses to comments received on the Dominguez Channel and Greater Harbor Waters Toxic Pollutants TMDL, "…primarily one pollutant, DDT, is associated with the Superfund site and also addressed by the TMDL. The TMDL addresses numerous pollutants and utilizes a different process than Superfund. The other pollutants – heavy metals, PAHs, PCBs and other legacy pesticides are not within Superfund's focus at the Montrose OU2 Site…" Further, the WQBELs applicable to the County and LACFCD pursuant to the TMDL, which are in Attachment N, Part E of the LA County MS4 Permit, are for ongoing discharges from the MS4, not for the historic contamination of the bed sediments. Therefore, the statement in the draft WMP incorrectly concludes that the aforementioned Consent Decree releases the County and LACFCD from any obligation to implement the WQBELs in Attachment N, Part E.
Part VI.C.5.a.ii(2) and iv(2) Water Body-Pollutant Classification	The WMP needs to specify the applicable receiving water limitations for the Category 2 water body pollutant combinations (WBPCs) listed in Table 2. In addition, pH needs to be added to the list of Category 2 pollutants in Table 2. The WMP needs to address the pollutants identified on the State's Clean Water Act Section 303(d) List for Colorado Lagoon (indicator bacteria, which was not addressed by the Colorado Lagoon TMDL); and the 303(d) listing for indicator bacteria in Alamitos Bay.
Part VI.C.5.a.ii(3) and iv(2) Water Body-Pollutant Classification	The WMP needs to specify the applicable receiving water limitations for the Category 3 WBPCs. In addition, the WMP needs to include the rationale for not including aluminum as a Category 3 pollutant. The WMP needs to evaluate and address other pollutants that are otherwise causing or contributing to an exceedance of Receiving

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
	Water Limitations in Los Cerritos Channel Estuary, Colorado Lagoon, Alamitos Bay and San Pedro Bay, if any.
Part VI.C.5.a.iii Source Assessment	The WMP needs to include a source assessment regarding known and suspected storm water and non-storm water pollutant sources in discharges to the MS4 and from the MS4 to receiving waters. The source assessment should include (1) a discussion of findings from implementation of the minimum control measures under the 2001 Permit; (2) a discussion of the data and conclusions from the TMDL source investigations; and (3) TMDL monitoring data for Colorado Lagoon from the LACFCD storm drain.
Part VI.C.5.a.iii.(1)(b) Source Assessment	The WMP needs to identify on a map the County's MS4s within the County Island; catch basins and major outfalls for the County and LACFCD in the Los Cerritos Channel subwatershed; and catch basins and major outfalls for the LACFCD in the Los Cerritos Channel Estuary subwatershed and the Alamitos Bay subwatershed. Regional Water Board staff is aware that the CIMP identifies 4 outfalls to the Los Cerritos Channel, 2 or 3 of which are potentially major outfalls (Figure 13, Table 6, pp. 23-24). However, the WMP should include this information as well. In Figure 2 of the WMP, the Palo Verde Drain appears to be depicted in the wrong location.
Part VI.C.5.a.iv. Prioritization	The WMP needs to prioritize and address the Category 2 and 3 WBPCs for the Los Cerritos Channel Watershed.
Part VI.C.5.a.iv.(1) Prioritization	The WMP needs to provide a clear schedule that demonstrates implementation of the BMPs will achieve the required interim metal reductions by the compliance deadlines. In addition, justification and supporting data is required to support the expected reductions in pollutant loads. The WMP needs to specify a strategy to achieve the final water quality-based effluent limitations for the Colorado Lagoon Toxics TMDL and demonstrate that the interim WQBELs for chlordane, dieldrin, lead, zinc, DDT, PAHs, and PCBs in sediment have been achieved.
Part VI.C.5.a.iv.(2)(a) Prioritization	The County plans to implement connector pipe screen devices on the 4 catch basins within the County Island by July of 2017; justification is needed to demonstrate that this schedule is as short as possible.
Part VI.C.5.b.ii.(1) Selection of Watershed Control Measures	The WMP needs to specify a strategy that will be implemented to prevent or eliminate non-storm water discharges, if necessary based on the findings of the non-storm water screening program.
Part VI.C.5.b.iv.(3) Selection of Watershed Control Measures	The WMP needs to include the implementation actions to be carried out by the LACFCD or jointly by LACFCD and the City of Long Beach that have been proposed in the Colorado Lagoon Restoration Project and that will be implemented to achieve compliance with

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
	the interim and final WQBELs for the Colorado Lagoon Toxics TMDL.
Part VI.C.5.b.iv.(4)(a) Selection of Watershed Control Measures	The AB/LCC group is submitting the WMP to satisfy the Implementation Plan requirement of the Los Cerritos Channel (LCC) Metal TMDL. The WMP discusses existing and planned non-structural BMPs that will be implemented and potential structural BMPs that may be implemented if necessary to achieve the WLAs for copper, lead, and zinc along with the assumed pollutant reductions. However, the WMP needs to provide peer-reviewed data and/or modeling output to support the expected reduction in pollutant load, in order to demonstrate compliance with the interim WLAs that must be met by 2017 and 2020, as specified in the LCC Metals TMDL Implementation Plan. Where the AB/LCC group relies on the analysis of another group or previous implementation plan, such as the Ballona Creek Multi-pollutant Implementation Plan, the AB/LCC group should reiterate the analysis/findings in the revised WMP. The WMP needs to include control measures to achieve the interim and final WQBELs for the Colorado Lagoon Toxics TMDL and the interim WQBELs for the Harbors Toxics TMDL for direct discharges into San Pedro Bay.
Part VI.C.5.b.iv.(4)(b)-(d) Selection of Watershed Control Measures	The WMP states, "Over the next few years, the County will upgrade a portion of its mechanical broom street sweepers with new high efficiency vacuum street sweepers." In addition, the WMP states, "The County plans to implement CPS devices on the 4 catch basins within its jurisdiction in the AB/LCC WMA by July of 2017. Construction of the CPS devices is contingent upon appropriate field conditions and a thorough design review. CPS devices cannot be installed in areas where they may adversely affect flood protection or in catch basins that are too shallow to house CPS devices." The WMP needs to clearly identify when the 4 catch basins will be assessed as to whether a CPS device is feasible. The WMP needs to include a contingency if the CPS device cannot be installed in one or more of the catch basins. The revised WMP needs to provide more specificity with regards to the schedule of implementation for these watershed control measures that demonstrates compliance with the interim compliance deadlines for metals. In addition, the revised WMP needs to address how the LACFCD will comply with the trash requirements for catch basins and outfalls in the Los Cerritos Channel Estuary subwatershed and the Alamitos Bay subwatershed.

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
Part VI.C.5.b.iv.(5) Reasonable Assurance Analysis	The WMP modeled the critical condition, the daily pollutant loads for Cu, Pb, and Zn during wet weather, and the required wet weather load reduction. However, the calculated load reductions were done incorrectly. Since the 95-acre County Island is about 1% of the entire Los Cerritos Channel watershed; then the County's portion of the WLAs is 1%. In addition, the RAA did not address the non-storm water copper WLAs or other pollutants in Category 1 for the Colorado Lagoon Toxics TMDL and Harbors Toxics TMDL. The Reasonable Assurance Analysis (RAA) needs to address all applicable WQBELs in Attachments N and Q and other applicable waterbody-pollutant combinations falling within Categories 2 and 3. (See also detailed comments on the County's RAA in the attached memorandum.)
Part VI.C.5.c Compliance Schedules	The WMP needs to demonstrate that the interim deadlines are being or will be achieved. In addition, the WMP needs to include the interim and final compliance deadlines for September 30, 2023, for the wet weather waste load allocation and dry weather waste load allocation, respectively.

TO: Bill Johnson, P.E.
Alamitos Bay/Los Cerritos Channel Watershed Management Program

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 24, 2014

SUBJECT: COMMENTS ON SECTION 5, REASONABLE ASSURANCE ANALYSIS, OF THE DRAFT WATERSHED MANAGEMENT PROGRAM FOR THE ALAMITOS BAY/LOS CERRITOS CHANNEL WATERSHED MANAGEMENT AREA

This memorandum contains comments on Section 5, Reasonable Assurance Analysis, of the Alamitos Bay/Los Cerritos Channel Watershed Management Program, dated June 28, 2014, which was submitted by the Los Angeles County Flood Control District (LACFCD) and the County of Los Angeles Department of Public Works (County) for the 95-acre County unincorporated land area within the Los Cerritos Channel Freshwater Watershed and the LACFCD's storm drains and other appurtenant drainage infrastructure within the Los Cerritos Channel Freshwater Watershed, Los Cerritos Channel Estuary Watershed, and Alamitos Bay Watershed.

A. General comments on the draft Reasonable Assurance Analysis (RAA) section of the draft Watershed Management Program.

1. The Alamitos Bay/Los Cerritos Channel Group (AB/LCC Group) are subject to final water quality-based effluent limitations pursuant to Attachment N, Part E "Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL", and Attachment Q, Part A "Los Cerritos Channel Metals TMDL", Part B "Colorado Lagoon OC Pesticides, PCBs, Sediment Toxicity, PAHs, and Metals TMDL."

   Pursuant to Part VI.C.5.a.iv(1) and VI.C.5.b.iv, pages 60 and 62-63 of the MS4 Permit, the AB/LCC Group are required to prepare reasonable assurance analysis to demonstrate that the WQBELs that are established in the Colorado Lagoon OC Pesticides, PCBs, Sediment Toxicity, PAHs, and Metals TMDL shall be achieved through implementation of the watershed control measure proposed in the WMP. However, the Colorado Lagoon OC Pesticides, PCBs, Sediment Toxicity, PAHs, and Metals TMDL was completely omitted from the draft WMP. The draft WMP did not include and analyze a strategy to implement pollutant controls necessary to achieve all applicable interim and final water quality-based effluent limitations and/or receiving water limitations with interim or final compliance deadlines within the permit term pursuant to the corresponding compliance schedules in the Colorado Lagoon OC Pesticides, PCBs, Sediment Toxicity, PAHs, and Metals TMDLs.

2. The AB/LCC Group used historic data from the Stearns Street Mass Emission Station to determine Category 3 and low priority pollutants, which is only appropriate to identify pollutants of concern for the freshwater portion of the Los Cerritos Channel. There is no data analysis or information provided for high priority (Category 2) and medium priority (Category 3) pollutants of concern for Los Cerritos Channel Estuary Watershed and Alamitos Bay Watershed.

3. The AB/LCC Group had identified water quality priorities for Los Cerritos Channel but not for Colorado Lagoon and East San Pedro Bay, where the following drains discharge to: LACFCD Project 452 Drain (Colorado Lagoon), BI 5151 U2 - Line A - Long Beach, BI 0450 - line G - Alamitos Bay, BI 5101 U2 - Line A - Long Beach, and BI 0450 - Line A - Alamitos Bay. Pursuant to Section VI.C.5.a., the WMP should include an evaluation of existing water quality conditions, classify them into categories, identify potential sources, and identify strategies, control measures, and BMPs as required in the permit.

4. The TMDL allowable daily loads for metals applicable to the County Island were incorrectly calculated. The calculated TMDL allowable load did not take into account that the County Island area only covers 95 acres, which is approximately 1% of the LCC Freshwater Watershed area covered under the LA County MS4 Permit to which the assigned LA County MS4 Permittees' WLA applies. (The areal extent of the watershed area covered by the LA County MS4 Permit is 9,470 acres.) Table 5 on page 18 of the draft WMP needs to be revised to include the correct TMDL allowable loads for the County Island, specifically, and recalculated required pollutant load reductions. (Also, the table needs to be corrected to state that the TMDL establishes an allowable daily load; the allowable loads for lead and zinc are presented as annual loads not daily loads.) Identification of potential BMPs and modeling of these BMP scenarios for the reasonable assurance analysis to ensure the required reductions are achieved should also be revised accordingly.

B. Modeling comments regarding analysis of copper, lead and zinc concentrations / loads:

1. The model domain used for predicting flow volume and pollutant loading is limited in the County Island area, which is located within WMMS subbasin 5505. As such, the model prediction did not take upstream and neighboring hydrological contribution of flow and pollutant loading into account. This is based on the assumption that these surrounding flows and pollutant loading will be addressed by the Los Cerritos Channel Watershed Management Program submitted by other LA County MS4 Permittees.

2. The model predicted flow volume appears to be used as an indicator of required pollutant load reductions for wet weather condition. Thus, the predicted flow volume becomes a very important parameter for evaluating each BMP's performance and required load reductions. In addition to Figures 6 and 7, the model results of daily storm flow volume originating from County Island and the frequency analysis should be presented in tabular form to identify the predicted 90^{th} percentile daily flow volume. Additionally, more description should be presented in the report regarding how the daily pollutant loads for copper, lead, and zinc from the County Island were derived, as identified on page 17.

3. The report did not describe how the model was calibrated, including calibration results compared to calibration criteria in Table 3.0 of the RAA Guidelines, and no historical hydrology and water quality monitoring data were used for comparison with the model results for the baseline prediction. According to Part G, pages 12-13 of the RAA Guidelines, model calibration is necessary to ensure that the model can properly assess all the variables and conditions in a watershed system. If hydrology data are not currently available, the necessary data should be collected so that the model can be calibrated and/or validated during the adaptive management process. Water quality data are available from the Stearns Street mass emission station, which could be used for water quality calibration.

4. For the baseline condition, per RAA Guideline, in Table 5 on pages 20-21, the model predicted concentrations for copper, lead, and zinc under the wet weather critical condition should be presented in the table in addition the baseline loads for the County Island.

5. The required reduction targets in pollutant load from baseline identified in Table 5 of the Report for wet weather should be explained in more detail and also presented in time series as the difference of baseline concentrations/loads from allowable concentrations/loads of each pollutant under long term continuous simulation. Further, as described earlier, the TMDL allowable loads presented in Table 5 appear to be incorrect as well as the required load reductions, which are derived from the baseline loads and allowable loads.

6. The report did not provide predicted pollutant concentrations in the receiving water or at the downstream outlets of the County Island to demonstrate that receiving water limitations will be achieved.

7. The ID number for subbasin 5505 and each neighboring subwatershed used in the model simulation must be provided and be shown in the simulation domain to present the geographic relationship of the subwatersheds simulated in the LSPC model.

8. The flow and water quality time series output at the watershed outlet must be provided using the 90th percentile of modeled pollutant concentration and mass per day for wet event days consistent with the expression of the WQBELs to estimate the baseline concentration and mass. In addition, per RAA Guidelines, the model output should include storm water runoff at outlet for baseline and each BMP scenario as well (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

9. While copper is identified in Table 3 as a Category 1 pollutant in both wet and dry weather conditions, model simulation for copper in Los Cerritos Channel under the dry weather condition was not included in the RAA.

10. Per the RAA Guidelines, the required load reductions to achieve interim and final WQBELs per the required compliance deadlines should be evaluated at the jurisdictional boundary of each subwatershed to demonstrate that the proposed control measures will ensure that each Group's MS4 discharges achieve effluent limitations and do not cause or contribute to exceedances of receiving water limitations. The BMP performance model proposed in the RAA Guidelines should be used to predict the pollutant reduction

for BMPs identified in Section 5.2.5 of the Report. Section 5.2.6 of the draft WMP does not clearly present, or analyze in the RAA, the BMP scenarios to meet the interim compliance deadlines in 2017, 2020 or 2023 during wet weather conditions or the interim deadlines in 2017 and 2020 and the final deadline in 2023 during dry weather conditions.

C. Modeling comments regarding lack of analysis for other Categories 1, 2 and 3 waterbody pollutant combinations:

1. Baseline loading and required reductions to achieve effluent limitations for total lead, zinc, DDT, PAHs, PCBs, Chlordane and Dieldrin in sediment discharged from the MS4 to Colorado Lagoon, and for total copper, lead, zinc, PAHs, DDT, and PCBs for San Pedro Bay were not modeled in the Report, nor were proposed watershed control measures evaluated in the model to determine if effluent limitations for these pollutants would be achieved upon implementation of the proposed measures.

2. Baseline loading and required reductions for Category 2 and Category 3 pollutants, including but not limited to indicator bacteria and ammonia, were not modeled, nor were proposed watershed control measures evaluated in the model to determine if receiving water limitations for these pollutants would be achieved upon implementation of the proposed measures.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

October 29, 2014

Los Cerritos Channel Watershed Management Group
(See Distribution List)

REVIEW OF THE LOS CERRITOS CHANNEL WATERSHED MANAGEMENT GROUP'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175) AND PART VII.C OF THE LONG BEACH MS4 PERMIT (NPDES PERMIT NO. CAS004003; ORDER NO. R4-2014-0024)

Dear Los Cerritos Channel Watershed Management Group:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 30, 2014 by the Los Cerritos Channel Watershed Management Group. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

NPDES Permit No. CAS004003 (Order No. R4-2014-0024) authorizes MS4 discharges from the City of Long Beach (hereafter, Long Beach MS4 Permit). The Long Beach MS4 Permit similarly allows for the City of Long Beach to develop either a WMP or EWMP to implement permit requirements, with the option of collaborating with LA County MS4 Permit Permittees. For simplicity, this letter and its enclosures cite provisions in the LA County MS4 Permit, though the City of Long Beach is a member of the Los Cerritos Channel Watershed Management Group and is permitted under its own individual permit.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County MS4 Permit and must be approved by the Regional Water Board.

As stated above, on June 30, 2014, the Los Cerritos Channel Watershed Management Group (Group) submitted a draft WMP to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, some revisions to the Group's draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2. The LA County MS4 Permit includes a process through which necessary revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Board comments identified in the enclosures, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 29, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft LCC WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Chris.Lopez@waterboards.ca.gov.

If the necessary revisions are not made, the MS4 Permittees within the LCC Watershed Management Area will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment Q pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft Los Cerritos Channel WMP is approved, the Permittees are required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii); and
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters.

In addition on June 30, 2014, the Group submitted a draft Coordinated Integrated Monitoring Program (CIMP) to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Mr. Chris Lopez of the Storm Water Permitting Unit by electronic mail at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures:
Enclosure 1 – Summary of Comments and Necessary Revisions
Enclosure 2 – Comments on Reasonable Assurance Analysis

cc: Richard Watson, Richard Watson & Associates, Inc.

Enclosure 1 to October 29, 2014 Letter Regarding the Los Cerritos Channel Watershed Management Group's Draft Watershed Management Program

Summary of Comments and Necessary Revisions to the Draft Watershed Management Program

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.a.ii.(2)-(3) (Category 2 and 3 Pollutants – Receiving Water Limitations)	The Group should clearly identify the applicable receiving water limitations for the Category 2 and 3 pollutants it has identified in Tables 2-11 and 2-12 of the draft WMP by referring back to Table 2-3. Table 2-12 includes a column for "Standard of Exceedance" and identifies the document where the standard is found, but not the standard itself. However, it appears that all of the applicable receiving water limitations are included in Table 2-3, Including those for the "Low Priority Pollutants" listed in Table 2-13.
Part VI.C.5.a.iv.(2) (Prioritization – Ammonia)	The draft WMP notes that ammonia has been proposed for delisting and therefore will not be addressed. To justify this position, the Group should present the data demonstrating that there is no longer an impairment due to ammonia to support delisting.
Part VI.C.5.b.iv.(1)(a)(ii) (Minimum Control Measures – Industrial/Commercial Facilities Program)	The Group proposes to alter the commercial and industrial facility inspection frequencies in Parts VI.D.6.d and VI.D.6.e of the LA County MS4 Permit. The proposed modification includes a prioritization process in which the member Cities rate applicable facilities as high, medium, or low priority. High priority facilities are inspected more frequently and low priority facilities are inspected less frequently. The prioritization scheme included in Figure ICF-1 prioritizes facilities by their potential water quality impact. However, the draft WMP also notes that Cities "may follow an alternative prioritization method provided it results in a similar three-tiered scheme." The revised WMP should ensure, and explicitly state, that any alternative prioritization method used by a City must also be based on water quality impact. Furthermore, the draft WMP also notes that Cities can prioritize and reprioritize facilities at any time based on their discretion. The Group should revise their draft WMP to clearly state when the initial prioritization of facilities will occur. Additionally, the Group should be explicitly clear that

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
	during any reprioritization, the ratio of low priority to high priority facilities must always remain at 3:1 or lower to maintain inspection frequencies identified in the draft WMP.
Part VI.C.5.a.iv.(2)(a) (Prioritization)	Where data indicate impairment or exceedances of RWLs and the findings from the source assessment implicate discharges from the MS4, the Permit requires a strategy for controlling pollutants that is sufficient to achieve compliance as soon as possible. Although Section 5.0 describes compliance with RWLs and Section 6.0 includes an implementation schedule, the program needs to more clearly demonstrate that the compliance schedule described in Section 5.0 ensures compliance is "as soon as possible."
Part VI.C.5.b.iv.(4)(b)-(c) (Selection of Watershed Control Measures)	The RAA identifies potential areas for green street conversion and assumes a 30% conversion of the road length in the suitable areas; however, the specific locations and projects are not identified. Although it may not be possible to provide detailed information on specific projects at this time, the WMP should at least commit to the construction of the necessary number of projects within specific subbasins to ensure compliance with permit requirements per applicable compliance schedules.
Watershed Control Measures Part VI.C.5.b.iv.(4)(c)	The draft WMP does not include clear information on the nature, scope, and timing of implementation of all its watershed control measures. Regional Water Board staff recognizes the amount of information that the Group has provided on watershed control measures in its draft WMP. However, this information at times lacks specificity or is interspersed within different sections of the draft WMP (e.g. street sweeping is discussed in the draft WMP's chapter on strategy, but not in the chapter on control measures). Regional Water Board staff suggests that the Group construct a concise table or other organized listing of all its discussed control measures that contains the required information. This would clarify the descriptions that the Group includes in Sections 3 and 4 of its draft WMP.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(4)(c) (Watershed Control Measures – Enhanced Street Sweeping)	The description of the enhanced street sweeping program lacks detail. It is discussed in Section 3 as part of the group's strategy, but details regarding implementation do not appear to be included in Section 4. In particular, since the City of Long Beach does not use vacuum or regenerative street sweepers, as indicated in Table 3-3, the WMP should be clear as to what enhancement to street sweeping the City of Long Beach will implement.
Part VI.C.5.b.iv.(4)(c) (Watershed Control Measures – SB 346 Copper Reductions)	The draft WMP appears to rely mostly on the phase-out of copper in automotive brake pads, via approved legislation SB 346, to achieve the necessary copper load reductions. Given the combination of other Cu sources identified in various LA TMDLs such as building materials, other vehicle wear, air deposition from fuel combustion and industrial facilities, and that SB 346 progressively phases out Cu content in brakes of new cars (5% by weight until 2021, 0.5% by weight until 2025), then other structural and non-structural BMPs may still be needed to reduce Cu loads sufficiently to achieve compliance deadlines for interim and/or final WQBELs.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(4)(d) (Watershed Control Measures – Milestones)	The MS4 Permit requires that the WMP provide specificity with regard to structural and non-structural BMPs, including the number, type, and location(s), etc. adequate to assess compliance. In a number of cases, additional specificity on the number, type and general location(s) of watershed control measures as well as the timing of implementation for each is needed. Section 6 of the draft WMP includes a four-phase WMP implementation schedule for control measures (MCMs, source control measures, stormwater capture, etc.). Some of these actions are listed as, "encourage the use of ..." (e.g., p. 6-6); greater specificity is required as to what actions will be taken by the group to encourage these actions by others. Items in the schedule only reference the year (or years) that a measure or milestone will be implemented. This should be revised to include more specific and/or exact dates where appropriate. Furthermore, some items discussed as control measures do not appear to have milestones within the implementation schedule (e.g., enhanced street sweeping in Table 6-4). Additionally, many items in the implementation schedule are ongoing measures that are not new interim milestones (e.g. MCMs, implementation of SB 346, enhanced street sweeping, etc.). For transparency, Regional Water Board staff recommends that ongoing measures clearly be separated from interim milestones for structural controls and non-structural BMPs in the implementation schedule. Regional Water Board staff recognizes uncertainties may complicate establishment of specific implementation dates, however there should at least be more specificity on actions within the current and next permit terms to ensure that the following interim requirements are met: (1) a 10% reduction in metals loads during wet weather and a 30% reduction in dry weather by 2017 and (2) a 35% reduction in metals loads during wet weather and a 70% reduction during dry weather by 2020.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(4)(e) (Watershed Control Measures – Permittee Responsibilities)	For MCMs and NSW discharge screening control measures, the draft WMP clearly lists responsibilities in Table 4-3. However, for other control measures, it is harder to identify Permittee responsibilities. The WMP Implementation Schedule groups together all actions that are being implemented. Although City specific items are marked (e.g. Skylinks Golf Course), it is hard to clearly read amongst the other group actions. The WMP could be improved by including a separate schedule for each City. Table 6-8 also breaks down control measure implementation; however, this is broken up into sub-basins rather than by City, making the responsibilities not immediately clear.
Part VI.C.5.b.iv.(5)(c) (Selection of Watershed Control Measures)	For waterbody-pollutant combinations not addressed by TMDLs, the MS4 Permit requires that the plan demonstrate using the reasonable assurance analysis (RAA) that the activities and control measures to be implemented will achieve applicable receiving water limitations as soon as possible. The RAA demonstrates the control measures would be adequate to comply with the limitations/deadlines for the "limiting pollutants" for TMDLs and concludes that this will ensure compliance for all other pollutants of concern. However, it does not address the question of whether compliance with limitations for pollutants not addressed by TMDLs could be achieved in a shorter time frame.
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Limiting Pollutants)	The RAA identifies zinc and *E. coli* as the limiting pollutants for wet weather and dry weather, respectively. They note that these two pollutants will drive reductions of other pollutants. If the Group believes that that this approach demonstrates that activities and control measures will achieve applicable receiving water limitations, it should explicitly state and justify this for the category 2 and 3 pollutants. (This appears to have been done for category 1 pollutants and E. coli in Tables 5-6 and 5-9 and Figure 5-13, but not for other categories 2 and 3 pollutants.)

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – New Non-Structural Controls)	The draft WMP assumes a 10% pollutant reduction from new non-structural controls. Although 10% is a modest fraction of the overall controls necessary, additional support for this assumption should be provided, particularly since the group appears to be relying almost entirely on these controls for near-term pollutant reductions to achieve early interim milestones/deadlines. Additionally, as part of the adaptive management process, the Permittees should commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not supported.
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Irrigation Reductions)	For dry weather, the WMP assumes a 25% reduction in irrigation (RAA, section 7.1.2). Additional support should be provided for this assumption, particularly since the group appears to be relying almost entirely on this non-structural BMP for near-term pollutant reductions to meet early interim milestones/deadlines. Additionally, as part of the adaptive management process, the Permittees need to commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not supported.
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Regional BMPs)	Section 1.4.2 of Attachment A to the RAA points out that additional potential regional BMPs were identified to provide the remaining BMP volume noted in Table 9-5. It indicates they can be found in Section 3 of the WMP. It is unclear if the RAA is referring to the "First Order Major BMP Sites" listed in Table 4-5 and the "Second Order Major BMP Sites" listed in Table 4-6. The RAA should clarify that sufficient sites were identified. Additionally, the WMP should mention how these sites relate to the RAA.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Permitted Industrial Facilities)	The draft WMP, including the RAA, excludes stormwater runoff from non-MS4 facilities within the WMA from the stormwater treatment target. In particular, industrial facilities that are permitted by the Water Boards under the Industrial General Permit or an individual stormwater permit were identified and subtracted from the treatment target. Regional Water Board staff recognizes that this was done with the assumption that these industrial facilities will retain their runoff and/or eliminate their cause/contribution to receiving water exceedances, as required by their respective NPDES permit. However, it is important that the Group's actions under its Industrial/Commercial Facilities Program—including tracking critical industrial sources, educating industrial facilities regarding BMP requirements, and inspecting industrial facilities—ensure that all industrial facilities are implementing BMPs as required.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Caltrans Facilities)	The draft WMP, including the RAA, takes a similar approach for areas under the jurisdiction of the California Department of Transportation (Caltrans). Caltrans facilities that are permitted under the Caltrans MS4 permit (Order No. 2012-0011-DWQ) were also identified and subtracted from the treatment target. It should be noted that the Amendment to the Caltrans Permit (Order WQ 2014-0077-DWQ) includes provisions to address TMDL requirements throughout the state. Revisions to Attachment IV of the Caltrans Permit require that Caltrans prioritize all TMDLs for implementation of source control measures and BMPs, with prioritization being "consistent with the final TMDL deadlines to the extent feasible." Additionally, the Caltrans Permit also includes provisions for collaborative implementation through Cooperative Implementation Agreements between Caltrans and other responsible entities to conduct work to comply with a TMDL. By contributing funds to Cooperative Implementation Agreements and/or the Cooperative Implementation Grant Program, Caltrans may receive credit for compliance units, which are needed for compliance under the Caltrans Permit. In a similar manner, the LA County MS4 Permit includes provisions for Permittees to control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other MS4 owners—such as Caltrans—to successfully implement the provisions of the Order (see Parts VI.A.2.a.viii and VI.A.4.a.iii). Therefore, the Group should ensure that it is closely coordinating with appropriate Caltrans District staff regarding the identification and implementation of watershed control measures to achieve water quality requirements (i.e. applicable Receiving Water Limitations and WQBELs). Regional Water Board staff recognizes that the Group has taken the initial steps for such collaboration since Caltrans participates in the Group and the draft WMP notes Caltrans in its strategies for runoff reduction and total suspended solids reduction.
Part VI.C.5.b.iv.(6) (Legal Authority)	Attachment D to the draft WMP includes a copy of legal certifications for all Group members except for Long Beach. The legal certifications for Long Beach should be submitted in the revised WMP.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.c.iii.(3) (Compliance Schedules – Bacteria)	The draft WMP proposes a final compliance date of September 2040 for *E. coli* and *Enterococcus*. However, the Group does not provide sufficient justification for this date. Additionally, milestones and a schedule of dates for achieving milestones are not defined for these two pollutants. In revising its draft WMP, the Group should evaluate compliance schedules of bacteria TMDLs that have been established within the region and modify the proposed compliance schedule for these pollutants to include interim milestones and dates for their achievement and a final compliance date that is as soon as possible. Justification for the final compliance date as well as interim milestones should also be included.
Part VI.C.5.c.iii.(3) (Compliance Schedules – Ammonia and pH)	The draft WMP does not propose milestones or final compliance dates for ammonia and pH, which were both identified as Category 2 pollutants. The WMP should include milestones and compliance dates for these pollutants and address them through watershed control measures, or alternatively, provide the data to support delisting (in the case of ammonia) and to support that exceedances of pH outside the acceptable range are due to natural causes.
Figures and Symbols in Draft WMP	Some figures in the draft WMP are distorted. Examples include: - Figures 1-2 and 1-3 (on pages 1-6 and 1-8, respectively) have legends that are missing information - Table 4-4 (on page 4-13) does not display Figure ICF- 1 - Mathematical symbols used on pages 5-4 and 5-5 do not correctly display

*Equivalent provisions are also found in the Long Beach MS4 Permit

Los Angeles Regional Water Quality Control Board

TO: Los Cerritos Channel Watershed Management Group

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 29, 2014

SUBJECT: COMMENTS ON REASONABLE ASSURANCE ANALYSIS REPORT FOR LOS CERRITOS CHANNEL WATERSHED MANAGEMENT AREA

This memorandum contains comments on the Reasonable Assurance Analysis (RAA), submitted on June 29, 2014, by the Los Cerritos Channel Watershed Management Group.

A. General comments on the draft Reasonable Assurance Analysis (RAA) of the Watershed Management Program (WMP).

1. The Los Cerritos Channel Watershed Management Area (LCC WMA) is subject to interim and final water quality-based effluent limitations pursuant to Attachment Q, Part A "Los Cerritos Channel Metals TMDL" for both wet and dry weather conditions. By September 30, 2017, which aligns with the end of Phase 1 of the proposed implementation schedule in the draft WMP, the LCC WMA is required to demonstrate that 30% of the total drainage area served by the storm drain system is effectively meeting the dry weather metals WLAs and 10% of the total drainage area served by the storm drain system is effectively meeting the wet-weather metals WLAs. For the most part, during Phase 1 the selected watershed control measures to address water quality priorities and achieve applicable WQBELs include existing planning for implementation of SB 346 to remove copper in brake pads and other ongoing non-structural BMPs and source control measures. There is uncertainty in the ability of these BMPs to meet the required reductions by the end of Phase 1. Additional support for the anticipated pollutant load reductions from these non-structural BMPs and source control measures over the next two to three years should be provided to increase the confidence that these measures can achieve the near-term interim WQBELs by September 2017.

2. LCC WMA is also subject to Category 2 priority pollutants, including coliform bacteria. The LCC WMP proposes to address bacteria with the same runoff reduction and stormwater capture measures proposed for Category 1 pollutants as well as ongoing implementation of minimum control measures. However, this might not be effective enough in reducing bacteria loading. The LCC WMP acknowledges that it will address bacteria more directly during the second and third adaptive management cycles. The LCC WMP should include a more specific strategy to implement pollutant controls necessary to address this and other Category 2 pollutants earlier.

B. Modeling comments regarding analysis of copper, lead, zinc, DDT, PCB, PAH, and bacteria concentrations/loads in Attachment A of the draft Los Cerritos Channel WMP:

1. The model predicted stormwater runoff volume is used as a surrogate for required pollutant load reductions for wet weather conditions. Thus, the predicted flow volume becomes a very important parameter for evaluating required volume reductions and BMP scenarios; however, there was not available flow data for Los Cerritos Channel to conduct a hydrology calibration assessment. The necessary hydrology data should be collected for Los Cerritos Channel so that model calibration/validation can be conducted during the adaptive management process.

2. While we understand that there is significant reliance on a volume-based approach, the predicted baseline concentrations and loads for all modeled pollutants of concern, including TSS, should be presented in summary tables for wet weather conditions. This model output should be available, since it is the basis for the percent reductions in pollutant load presented in Table 5-6. (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

3. Further, the differences between baseline concentrations/loads and allowable concentrations/loads should be presented in time series for each pollutant under long-term continuous simulation and as a summary of the differences between pollutant concentrations/loads and allowable concentrations/loads for the critical wet weather period. (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

4. We note that modeling was not conducted for organics (DDT, PCBs, and PAHs). It is not clear why these pollutants were not modeled or why previous modeling of these pollutants could not be used, such as that conducted during the development of the Dominguez Channel and Greater LA and Long Beach Harbor Waters Toxic Pollutants TMDL. An explanation for the lack of modeling is needed.

5. The report presents the existing runoff volumes, required volume reductions and proposed volume reductions from BMP scenarios to achieve the 85th percentile, 24-hour volume retention standard for each major watershed area. The same information on the runoff volume associated with the 85th percentile, 24-hour event and the proposed runoff volume reduction from each BMP scenario also needs to be presented for each modeled subbasin (e.g., a series of tables similar to 8-1 through 8-4 and 9-4 through 9-7). See Table 5 of the RAA Guidelines. Additionally, more explanation is needed as to what constitutes the "incremental" and "cumulative" critical year storm volumes in tables 9-4 through 9-7 and how these values were derived from previous tables.

6. The report needs to present the same information, if available, for non-stormwater runoff. Alternatively, the report should include a commitment to collect the necessary data in each watershed area, through the non-stormwater outfall screening and monitoring program, so that the model can be re-calibrated during the adaptive management process to better characterize non-stormwater flow volumes and to demonstrate that proposed volume retention BMPs will capture 100 percent of non-stormwater that would otherwise be discharged through the MS4 in each watershed area.

7. The ID number for each of the subwatersheds from the model input file should be provided and be shown in the simulation domain to present the geographic relationship of subwatersheds, within each watershed area, that are simulated in the LSPC model.

October 28, 2014

Lower Los Angeles River Watershed Management Group
(See Distribution List)

REVIEW OF THE LOWER LOS ANGELES RIVER WATERSHED MANAGEMENT GROUP'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175) AND PART VII.C OF THE CITY OF LONG BEACH MS4 PERMIT (NPDES PERMIT NO. CAS004003; ORDER NO. R4-2014-0024)

Dear Lower Los Angeles River Watershed Management Group:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 27, 2014 by the Lower Los Angeles River Watershed Management Group. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a WMP or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

NPDES Permit No. CAS004003 (Order No. R4-2014-0024) authorizes discharges from the MS4 originating within the City of Long Beach (hereafter, Long Beach MS4 Permit). The Long Beach MS4 Permit similarly allows for the City of Long Beach to develop either a WMP or EWMP to implement permit requirements, with the option of collaborating with LA County MS4 Permit Permittees. For simplicity, this letter and its enclosures cite provisions in the LA County MS4 Permit even though the City of Long Beach is a member of the Lower Los Angeles River Watershed Management Group and is permitted under its own individual permit.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County MS4 Permit and must be approved by the Regional Water Board.

As stated above, on June 27, 2014, the Lower Los Angeles River Watershed Management Group (Group) submitted a draft WMP to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, some revisions to the Group's draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2. The LA County MS4 Permit includes a process through which necessary revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Board comments identified in the enclosures, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 28, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft Lower LA River WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Chris.Lopez@waterboards.ca.gov.

If the necessary revisions are not made, the Permittees will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment O pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft Lower Los Angeles River WMP is approved, the Permittees are required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii);
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters; and
(d) Implement watershed control measures, where possible from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash water quality-based effluent limits (WQBELs) and all other final WQBELs and receiving water limitations by the applicable compliance deadlines occurring prior to approval of the WMP.

In addition on June 27, 2014, the Lower Los Angeles River Watershed Management Group submitted a draft Coordinated Integrated Monitoring Program (CIMP) to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger, P.E.
Executive Officer

Enclosures:
Enclosure 1 – Summary of Comments and Necessary Revisions
Enclosure 2 – Comments on Reasonable Assurance Analysis

cc: John Hunter, John L. Hunter and Associates, Inc.

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Enclosure 1 to October 28, 2014 Letter Regarding the Lower Los Angeles River Watershed Management Area Draft Watershed Management Program

Summary of Comments and Required Revisions to the Draft Watershed Management Program

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
Part VI.C.1.d (Purpose of Watershed Management Program, page 47)	Section 1.1 of the draft WMP states, "the goal of these requirements is to reduce the discharge of pollutants from MS4s to the maximum extent practicable." The goal of the three permits and of a WMP is broader than presented (p. 1-1). Per Part VI.C.1.d of the LA County MS4 Permit, the goals of the Watershed Management Programs are to "... ensure that discharges from the Permittee's MS4: (i) achieve applicable water quality-based effluent limitations in Part VI.E and Attachments L through R pursuant to the corresponding compliance schedules, (ii) do not cause or contribute to exceedances of receiving water limitations in Parts V.A and VI.E and Attachments L through R, and (iii) do not include non-storm water discharges that are effectively prohibited pursuant to Part III.A. The programs shall also ensure that controls are implemented to reduce the discharge of pollutants to the maximum extent practicable (MEP) pursuant to Part IV.A.1." The revised WMP needs to acknowledge the broader goals set forth in the permit.
Part VI.C.5.a.iii.(1)(a)(v) (Source Assessment, page 60)	The MS4 Permit requires that TMDL source investigations be considered in the source assessment. Although several TMDLs are discussed in Section 2.2, others with potentially useful insights such as the Los Angeles River metals TMDL were not. The group should consider the source investigations from all relevant TMDLs for possible insights into important sources that might be useful in designing an effective program.
Part VI.C.5.a.iii.(1)(a)(vi) (Source Assessment, page 60)	The MS4 Permit requires the source assessment to include data and conclusions from watershed model results. The Regional Water Board did not find any responsive information in the draft WMP and any available information should be noted in the final WMP. For example, relevant findings presented in the implementation plans for the LA River metals TMDL submitted in

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
	October 2010 by Reach 1 and Compton Creek participating jurisdictions and Reach 2 participating jurisdictions should be included.
Part VI.C.5.a.iii.(1)(a)(vii) (Source Assessment, page 60)	The MS4 Permit requires a map of the MS4 including major outfalls and major structural controls. Appendix H of the CIMP provides maps showing the major outfalls and Appendix D of the draft WMP provides a tabular list of existing and proposed BMPs. The revised WMP should include a map (or GIS project file) of these BMPs as well. Also, the outfall database should be submitted with the revised WMP. In addition, Section VII.A of Attachment E to the MS4 Permit requires maps of the drainage areas associated with the outfalls and these were not provided. Section 1.3.2 of the WMP does note that 53 catchments are located in the watershed, and maps showing these drainage areas should be provided. If these are not readily available, a process and timeline for developing this spatial information should be included in the revised WMP.
Part VI.C.5.a.iv.(1) (Prioritization, page 60)	The MS4 Permit requires a strategy to implement pollutant controls necessary to achieve WQBELs and/or receiving water limitations (RWLs) with compliance deadlines that have already passed and limitations have not been achieved. The LA River metals TMDL includes interim wet and dry water quality-based effluent limitations with a compliance deadline of January 2012; the WMP needs to address the compliance status of the Permittees with these limitations, and ensure compliance. In Section 3.4.1.6, the draft WMP states, "[a]s recognized by the footnote in Attachment K-4 of the Permit, the Participating Agencies have entered into an Amended Consent Decree with the United States and the State of California, including the Regional Board, pursuant to which the Regional Board has released the Participating Agencies from responsibility for toxic pollutants in the Dominguez Channel and the Greater Los Angeles and Long Beach Harbors." This statement misinterprets the Regional Water Board's findings. Footnote 1 to Table K-4 of the LA County MS4 Permit states, "[t]he requirements of this Order to implement the obligations of this TMDL do not apply to a Permittee to the extent that it is determined that the Permittee has been released from that obligation pursuant to the Amended Consent Decree entered in

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
	United States v. Montrose Chemical Corp., Case No. 90-3122 AAH (JRx)." As stated in the responses to comments received on the Dominguez Channel and Greater Harbor Waters Toxic Pollutants TMDL, "...primarily one pollutant, DDT, is associated with the Superfund site and also addressed by the TMDL. The TMDL addresses numerous pollutants and utilizes a different process than Superfund. The other pollutants – heavy metals, PAHs, PCBs and other legacy pesticides are not within Superfund's focus at the Montrose OU2 Site..." Further, the WQBELs in Attachment N, Part E of the LA County MS4 Permit and Part VIII.P of the Long Beach MS4 Permit are for ongoing discharges from the MS4, not for the historic contamination of the bed sediments. Therefore, the statement in the draft WMP incorrectly concludes that the aforementioned Consent Decree releases MS4 Permittees from any obligation to implement the WQBELs in the MS4 permits.
Part VI.C.5.a.iv.(2)(a) (Prioritization, page 60)	Where data indicate impairment or exceedances of RWLs and the findings from the source assessment implicate discharges from the MS4, the Permit requires a strategy for controlling pollutants that is sufficient to achieve compliance as soon as possible. Although Section 3 includes a compliance strategy, the program needs to more clearly demonstrate that the compliance schedule (Section 5) ensures compliance is "as soon as possible."
Part VI.C.5.b.iv.(5)(c) (Selection of Watershed Control Measures, page 64)	For waterbody-pollutant combinations not addressed by TMDLs, the MS4 Permit requires that the plan demonstrate using the reasonable assurance analysis (RAA) that the activities and control measures to be implemented will achieve applicable receiving water limitations as soon as possible. The RAA demonstrates the control measures would be adequate to comply with the limitations/deadlines for the "limiting pollutants" for TMDLs and concludes that this will ensure compliance for all other pollutants of concern. However, it does not address the question of whether compliance with limitations for pollutants not addressed by TMDLs could be achieved in a shorter time frame.
Part VI.C.5.b.iv.(4)(b)-(c) (Selection of Watershed Control Measures, page 63)	The MS4 Permit requires that the WMP provide specificity with regard to structural and non-structural BMPs, including the number, type, and location(s), etc. adequate to assess compliance. In a number of cases, additional specificity on the

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
	number, type and general location(s) of watershed control measures as well as the timing of implementation for each is needed. (Regional Water Board staff notes, for example, that many watershed control measures in the implementation schedule only reference the year (or years) that a measure or milestone will be implemented. This should be revised to include more specific and/or exact dates where appropriate.) Additionally, many watershed control measures in the implementation schedule are ongoing measures that are not new interim milestones (e.g. MCMs, implementation of SB 346, enhanced street sweeping, etc.). For transparency, Regional Water Board staff recommends that ongoing measures clearly be separated from interim milestones for structural controls and non-structural BMPs in the implementation schedule. Regional Water Board staff recognizes uncertainties may complicate establishment of specific implementation dates, however there should at least be more specificity on actions within the current and next permit terms. <u>Green Street Conversion</u>: The RAA identifies potential areas for green street conversion and assumes a 30% conversion of the road length in the suitable areas; however, the specific locations and projects are not identified. Although it may not be possible to provide detailed information on specific projects at this time, the WMP should at least commit to the construction of the necessary number of projects to ensure compliance with permit requirements per applicable compliance schedules. <u>Reductions from New Non-structural Controls</u>: The WMP assumes a 10% pollutant reduction from new non-structural controls. Although 10% is a modest fraction of the overall controls necessary, additional support for this assumption should be provided, or as part of the adaptive management process, the Permittees should commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not supported.
Part VI.C.5.b.iv.(4)(b)-(c) (Selection of Watershed Control Measures, page 63)	<u>Reductions in Irrigation Runoff</u>: For dry weather, the WMP assumes a 25% reduction in irrigation (which results in a 60% reduction in pollutant discharges);

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
	additional support should be provided for this assumption, or as part of the adaptive management process, the Permittees need to commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not supported. Regional BMPs: Section 1.4.2 of Attachment A to the RAA points out that additional potential regional BMPs were identified to provide the remaining BMP volume noted in Table 9-4. It indicates they can be found in Section 4 of the WMP (actually, they are found in Section 3). The RAA should clarify that sufficient sites were identified so that the remaining necessary BMP volume can be achieved by those sites that were not "excluded for privacy." Industrial Facilities: The draft WMP, including the RAA, excludes stormwater runoff from non-MS4 facilities within the WMA from the stormwater treatment target. In particular, industrial facilities that are permitted by the Water Boards under the Industrial General Permit or an individual stormwater permit were identified and subtracted from the treatment target. Regional Water Board staff recognizes that this was done with the assumption that these industrial facilities will retain their runoff and/or eliminate their cause/contribution to receiving water exceedances, as required by their respective NPDES permit. However, it is important that the Permittees' actions under its Industrial/Commercial Facilities Program—including tracking critical industrial sources, educating industrial facilities regarding BMP requirements, and inspecting industrial facilities—ensure that all industrial facilities are implementing BMPs as required. Caltrans Facilities: The draft WMP, including the RAA, takes a similar approach for areas under the jurisdiction of the California Department of Transportation (Caltrans). Caltrans facilities that are permitted under the Caltrans MS4 permit (Order No. 2012-0011-DWQ) were also identified and subtracted from the treatment target. It should be noted that the Amendment to the Caltrans Permit (Order WQ 2014-0077-DWQ) includes provisions to address TMDL requirements throughout the state. Revisions to Attachment IV of the Caltrans Permit require that Caltrans prioritize all TMDLs for implementation of source control measures and BMPs, with

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
	prioritization being "consistent with the final TMDL deadlines to the extent feasible." Additionally, the Caltrans Permit also includes provisions for collaborative implementation through Cooperative Implementation Agreements between Caltrans and other responsible entities to conduct work to comply with a TMDL. By contributing funds to Cooperative Implementation Agreements and/or the Cooperative Implementation Grant Program, Caltrans may receive credit for compliance units, which are needed for compliance under the Caltrans Permit. In a similar manner, the LA County MS4 Permit includes provisions for Permittees to control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other MS4 owners—such as Caltrans—to successfully implement the provisions of the Order (see Parts VI.A.2.a.viii and VI.A.4.a.iii). Therefore, the Permittees should ensure that they are closely coordinating with appropriate Caltrans District staff regarding the identification and implementation of watershed control measures to achieve water quality requirements (i.e. applicable Receiving Water Limitations and WQBELs). Regional Water Board Staff recognizes that the Group has taken the initial steps for such collaboration since Caltrans participates in the Group and the draft WMP notes Caltrans in its strategies for runoff reduction and total suspended solids reduction.
Part VI.C.5.b.iv.(4)(c) (Selection of Watershed Control Measures – SB 346 Copper Reductions)	The draft WMP appears to rely heavily on the phase-out of copper in automotive brake pads, via approved legislation SB 346, to achieve the necessary copper load reductions. Given the combination of other Cu sources identified in various LA TMDLs such as building materials, other vehicle wear, air deposition from fuel combustion and industrial facilities, and that SB 346 progressively phases out Cu content in brakes of new cars (5% by weight until 2021, 0.5% by weight until 2025), then other structural and non-structural BMPs may still be needed to reduce Cu loads sufficiently to achieve compliance deadlines for interim and/or final WQBELs.
Part VI.C.5.b.iv.(1)(a)(ii) (Minimum Control Measures – Industrial/Commercial Facilities	The Group proposes to alter the commercial and industrial facility inspection frequencies in Parts VI.D.6.d and VI.D.6.e of the LA

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
Program)	County MS4 Permit. The proposed modification includes a prioritization process in which the MS4 Permittees rate applicable facilities as high, medium, or low priority. High priority facilities are inspected more frequently and low priority facilities are inspected less frequently. The prioritization scheme included in Figure ICF-1 prioritizes facilities by their potential water quality impact. However, the draft WMP also notes that Cities "may follow an alternative prioritization method provided it results in a similar three-tiered scheme." The revised WMP should ensure that any alternative prioritization method used by a City must also be based on water quality impact. No statement to this effect was included. Furthermore, the draft WMP also notes that Cities can prioritize and reprioritize facilities at any time based on their discretion. The Group should revise their draft WMP to clearly state when the initial prioritization of facilities will occur. Additionally, the Group should be explicitly clear that during any reprioritization, the ratio of low priority to high priority facilities must always remain at 3:1 or lower to maintain inspection frequencies identified in the draft WMP.
Part VI.C.5.b.iv.(5)	The RAA identifies zinc as the limiting pollutant and notes that this pollutant will drive reductions of other pollutants. If the Group believes that that this approach demonstrates that activities and control measures will achieve applicable receiving water limitations, it should explicitly state and justify this for each category 1, 2, and 3 pollutant.
Part VI.C.5.c.iii.(3) (Compliance Schedules – Bacteria)	The draft WMP proposes a final compliance date of September 2030 for bacteria in the LA River Estuary. However, the Group does not provide sufficient justification for this date. The compliance date for the lower Reach 2 and Reach 1 of the LA River is 2024 for achieving the dry-weather WQBELs. A Load Reduction Strategy must be submitted for this segment (Segment A in the TMDL) by September 2016. These dates are more appropriate to guide the schedule to address bacteria discharges during dry weather to the LA River Estuary. Additional milestones and a schedule of dates for achieving milestones should be defined for addressing bacteria discharges

LA County MS4 Permit Provision*	Summary of Comments and Necessary Revisions
	to the LA River Estuary.

*Equivalent provisions are also found in the Long Beach MS4 Permit

TO: Lower Los Angeles River Watershed Management Group

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 27, 2014

SUBJECT: COMMENTS ON REASONABLE ASSURANCE ANALYSIS REPORT FOR LOWER LOS ANGELES RIVER WATERSHED MANAGEMENT AREA

This memorandum contains comments on the Reasonable Assurance Analysis (RAA), dated June 27, 2014, which was submitted by the Lower Los Angeles River Watershed Management Group.

A. General comments on the draft Reasonable Assurance Analysis (RAA) section of the Watershed Management Program.

1. The Lower Los Angeles River Watershed Management Area (LLAR WMA) is subject to interim and final water quality-based effluent limitations pursuant to Attachment O, Part A "Los Angeles River Watershed Trash TMDL, Part B "Los Angeles River Nitrogen Compounds and Related Effects TMDL", Part C "Los Angeles River and Tributaries Metals TMDL", and Part D "Los Angeles River Watershed Bacteria TMDL". To the extent that MS4 Permittees within the LLAR WMA discharge directly to the Los Angeles River Estuary and/or San Pedro Bay, those discharges are subject to the WQBELs in Attachment N, Part E "Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL".[1]

   To the extent that discharges to the Los Angeles River Estuary are to be addressed by the LLAR WMP, pursuant to Part VI.C.5.a.iv(1) and VI.C.5.b.iv, pages 60 and 62-63 of the LA County MS4 Permit, the Lower Los Angeles River Group is required to conduct a reasonable assurance analysis to demonstrate that the WQBELs that are established in the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL shall be achieved through implementation of the watershed control measure proposed in the WMP. However, the Dominguez Channel and Greater Los

[1] The LLAR WMP states that, "[a]ll of the Lower LAR Agencies … discharge to the LAR above the Estuary." It also states, "[t]he areas under [the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants] TMDL discharging directly to the Los Angeles and Long Beach Harbors will be addressed separately in the Long Beach individual WMP…" (Section 3.4.1.6, p. 3-29). It is unclear whether discharges from the City of Long Beach to the Los Angeles River Estuary are being addressed in the LLAR WMP or in a separate individual WMP submitted by the City of Long Beach. In section 3.4.1.5, the draft WMP states, "[t]his Watershed Management Program incorporates the LARE…" (p. 3-28). Clarification is needed as to whether the LLAR WMP addresses discharges to the Los Angeles River Estuary or not.

Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL was appears to be completely omitted from the draft WMP. The draft WMP did not include and analyze a strategy to implement pollutant controls necessary to achieve all applicable interim and final water quality-based effluent limitations and/or receiving water limitations with interim or final compliance deadlines within the permit term pursuant to the corresponding compliance schedules in the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL.

2. The draft Lower Los Angeles River WMP identified water quality priorities for Los Angeles River (Estuary, Reaches 1 and 2), Compton Creek, and Rio Hondo), but not for San Pedro Bay. Pursuant to Section VI.C.5.a., the WMP should be revised to include an evaluation of existing water quality conditions, classify them into categories, identify potential sources, and identify strategies, control measures, and BMPs as required in the permit for San Pedro Bay unless MS4 discharges from the LLAR WMA directly to San Pedro Bay are being addressed in a separate WMP.

3. The draft WMP provided corresponding implementation schedules for nonstructural BMPs, which are assumed to result a 10% reduction in pollutant load. For structural BMPs, general implementation timeframes are given for the Proposition 84 Grant Award projects (section 5.2), implementation of the Planning and Land Development Program by Permittees (section 5.3.1), and wet weather volume reductions to meet 31% and 50% of the compliance target by 2017 and 2024, respectively. However, greater specificity should be provided with regard to these dates, and additional milestones and dates for their achievement between 2017 and 2024 should be included.

B. Modeling comments regarding analysis of copper, lead, zinc, DDT, PCB, PAH, and bacteria concentrations/loads in Appendix A-4-1 of the draft Lower Los Angeles River WMP:

1. The model predicted stormwater runoff volume is used as a surrogate for required pollutant load reductions for wet weather conditions. Thus, the predicted flow volume becomes a very important parameter for evaluating required volume reductions and BMP scenarios. Based on the results of the hydrology calibration shown in Table 4-2 and Table 4-3, the error differences between modeled flow volumes and observed data are 11.88% for the Lower Los Angeles River. For calibration purposes, upstream flow volume should be included to determine whether that improves the model performance to within the "Good" or "Very Good" range, per the RAA Guidelines. Once model calibration has been completed, the upstream flow volume can then be excluded when presenting the volume reduction targets in Tables 8-1 to 8-4.

2. While we understand that there is significant reliance on a volume-based approach, the predicted baseline concentrations and loads for all modeled pollutants of concern, including TSS, should be presented in summary tables for wet weather conditions. This model output should be available, since it is the basis for the percent reductions in pollutant load presented in Table 5-6. (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

3. Further, the differences between baseline concentrations/loads and allowable concentrations/loads should be presented in time series for each pollutant under long-term continuous simulation and as a summary of the differences between pollutant

concentrations/loads and allowable concentrations/loads for the critical wet weather period. (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

4. We note that modeling was not conducted for organics (DDT, PCBs, and PAHs). It is not clear why these pollutants were not modeled or why previous modeling of these pollutants could not be used, such as that conducted during the development of the Dominguez Channel and Greater LA and Long Beach Harbor Waters Toxic Pollutants TMDL. An explanation for the lack of modeling is needed.

5. The report presents the existing runoff volumes, required volume reductions and proposed volume reductions from BMP scenarios to achieve the 85th percentile, 24-hour volume retention standard for each major watershed area. The same information on the runoff volume associated with the 85th percentile, 24-hour event and the proposed runoff volume reduction from each BMP scenario also needs to be presented for each modeled subbasin (e.g., a series of tables similar to 8-1 through 8-4 and 9-4 through 9-7). See Table 5 of the RAA Guidelines. Additionally, more explanation is needed as to what constitutes the "incremental" and "cumulative" critical year storm volumes in tables 9-4 through 9-7 and how these values were derived from previous tables.

6. The report needs to present the same information, if available, for non-stormwater runoff. Alternatively, the report should include a commitment to collect the necessary data in each watershed area, through the non-stormwater outfall screening and monitoring program, so that the model can be re-calibrated during the adaptive management process to better characterize non-stormwater flow volumes and to demonstrate that proposed volume retention BMPs will capture 100 percent of non-stormwater that would otherwise be discharged through the MS4 in each watershed area.

7. The ID number for each of the 147 subwatersheds from the model input file should be provided and be shown in the simulation domain to present the geographic relationship of subwatersheds, within each watershed area, that are simulated in the LSPC model.

Los Angeles Regional Water Quality Control Board

October 30, 2014

Lower San Gabriel River Watershed Management Group
(See Distribution List)

REVIEW OF THE LOWER SAN GABRIEL RIVER WATERSHED MANAGEMENT AREA DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175) AND PART VII.C OF THE LONG BEACH MS4 PERMIT (NPDES PERMIT NO. CAS004003; ORDER NO. R4-2014-0024)

Dear Lower San Gabriel River Watershed Management Group:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 30, 2014 by the Lower San Gabriel River Watershed Management Group. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

NPDES Permit No. CAS004003 (Order No. R4-2014-0024) authorizes MS4 discharges from the City of Long Beach (hereafter, Long Beach MS4 Permit). The Long Beach MS4 Permit similarly allows for the City of Long Beach to develop either a WMP or EWMP to implement permit requirements, with the option of collaborating with LA County MS4 Permit Permittees. For simplicity, this letter and its enclosures cite provisions in the LA County MS4 Permit, though the City of Long Beach is a member of the Lower San Gabriel River Watershed Management Group and is permitted under its own individual permit.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County MS4 Permit and must be approved by the Regional Water Board.

As stated above, on June 30, 2014, the Lower San Gabriel River Watershed Management Group submitted a draft WMP to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, some revisions to the City's draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2, respectively. The LA County MS4 Permit includes a process through which necessary revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Board comments identified in the enclosures, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 30, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft Lower San Gabriel River WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Chris.Lopez@waterboards.ca.gov.

If the necessary revisions are not made, the Lower San Gabriel River Cities will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment P pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft Lower San Gabriel River WMP is approved, the Cities are required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii); and
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters.

In addition on June 30, 2014, the Lower San Gabriel River Watershed Management Group submitted a draft Coordinated Integrated Monitoring Program (CIMP) to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Mr. Chris Lopez of the Storm Water Permitting Unit by electronic mail at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures:

Enclosure 1 – Summary of Comments and Necessary Revisions
Enclosure 2 – Comments on Reasonable Assurance Analysis

cc: John Hunter, John L. Hunter and Associates, Inc.

Enclosure 1 to October 30, 2014 Letter Regarding the Lower San Gabriel River Watershed Management Group's Draft Watershed Management Program

Summary of Comments and Necessary Revisions to Draft Watershed Management Program

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.1.d (Purpose of Watershed Management Program)	Section 1.1 of the draft WMP states, "the goal of these requirements is to reduce the discharge of pollutants from MS4s to the maximum extent practicable." The goal of the three permits and of a WMP is broader than presented (p. 1-1). Per Part VI.C.1.d of the LA County MS4 Permit, the goals of the Watershed Management Programs are to "... ensure that discharges from the Permittee's MS4: (i) achieve applicable water quality-based effluent limitations in Part VI.E and Attachments L through R pursuant to the corresponding compliance schedules, (ii) do not cause or contribute to exceedances of receiving water limitations in Parts V.A and VI.E and Attachments L through R, and (iii) do not include non-storm water discharges that are effectively prohibited pursuant to Part III.A. The programs shall also ensure that controls are implemented to reduce the discharge of pollutants to the maximum extent practicable (MEP) pursuant to Part IV.A.1." The revised WMP needs to acknowledge the broader goals set forth in the permit.
Part VI.C.5.a.ii.(1) (Category 1 Pollutants)	The MS4 permit requires WMPs to include the applicable numeric WQBELs for each approved TMDL within the WMA. These should be clearly listed within the WMP. They are currently identified in the RAA in Tables 5-4 and 5-5, but do not appear presented in the main document.
Part VI.C.5.a.ii.(2)-(3) (Categories 2 and 3 Pollutants)	The WMP needs to specify the applicable receiving water limitations for Category 2 water body pollutant combinations. These should be clearly listed within the WMP. It appears these are listed in Tables 2-3 to 2-11 in association with monitoring site specific summaries of exceedances of water quality objectives; however, it would provide greater clarity to also summarize them in a single table.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.a.iii.(1)(a)(vii) (Source Assessment)	The MS4 Permit requires a map of the MS4 including major outfalls and major structural controls. Appendix H of the CIMP provides maps showing the major outfalls and Appendix D of the draft WMP provides a tabular list of existing and proposed BMPs. The revised WMP should include a map (or GIS project file) of these BMPs as well. Also, the outfall database should be submitted with the revised WMP. In addition, Section VII.A of Attachment E to the MS4 Permit requires maps of the drainage areas associated with the outfalls and these were not provided. Section 1.3.2 of the WMP does note that 107 catchments are located in the watershed, and maps showing these drainage areas should be provided. If these are not readily available, a process and timeline for developing this spatial information should be included in the revised WMP.
Part VI.C.5.a.iv (Watershed Control Measures)	Where data indicate impairment or exceedances of RWLs and the findings from the source assessment implicate discharges from the MS4, the Permit requires a strategy for controlling pollutants that is sufficient to achieve compliance as soon as possible. Although Section 3 includes a compliance strategy, the program needs to more clearly demonstrate that the compliance schedules (Section 5) ensure compliance is "as soon as possible." The WMP needs to provide a clear schedule that demonstrates implementation of the BMPs will achieve the required interim metal reductions by the compliance deadlines. The WMP schedule should at the least provide specificity on actions within the current and next permit terms. Also, given the Gateway Proposition 84 project has received funding as of May 2014, and sites have been identified for BMP installation, it would be reasonable to update the WMP to contain project milestones and implementation timeframes for projects that will be implemented under this grant.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5)(c) (Selection of Watershed Control Measures)	For waterbody-pollutant combinations not addressed by TMDLs, the MS4 Permit requires that the plan demonstrate using the reasonable assurance analysis (RAA) that the activities and control measures to be implemented will achieve applicable receiving water limitations as soon as possible. The RAA demonstrates the control measures would be adequate to comply with the limitations/deadlines for the "limiting pollutants" for TMDLs and concludes that this will ensure compliance for all other pollutants of concern. However, it does not address the question of whether compliance with limitations for pollutants not addressed by TMDLs could be achieved in a shorter time frame.
Part VI.C.5.b.iv.(1)(a)(ii) (Minimum Control Measures – Industrial/Commercial Facilities Program)	The Group proposes to alter the commercial and industrial facility inspection frequencies in Parts VI.D.6.d and VI.D.6.e of the LA County MS4 Permit. The proposed modification includes a prioritization process in which the member Cities rate applicable facilities as high, medium, or low priority. High priority facilities are inspected more frequently and low priority facilities are inspected less frequently. The prioritization scheme included in Figure ICF-2 prioritizes facilities by their potential water quality impact. However, the draft WMP also notes that Cities "may follow an alternative prioritization method provided it results in a similar three-tiered scheme." The revised WMP should ensure that any alternative prioritization method used by a City must also be based on water quality impact. No statement to this effect was included. Furthermore, the draft WMP also notes that Cities can prioritize and reprioritize facilities at any time based on their discretion. The Group should revise their draft WMP to clearly state when the initial prioritization of facilities will occur. Additionally, the Group should be explicitly clear that during any reprioritization, the ratio of low priority to high priority facilities must always remain at 3:1 or lower to maintain inspection frequencies identified in the draft WMP.
Part VI.C.5.b.iv.(4)(b)-(c) (Selection of Watershed Control Measures)	The RAA identifies potential areas for green street conversion and assumes a 30% conversion of the road length in the suitable areas; however, the specific locations and projects are not identified. Although it may not be possible to provide detailed information on specific projects at this time, the WMP should at least commit to the construction of the necessary number of projects to ensure compliance with permit requirements per applicable compliance schedules.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(4)(d) (Watershed Control Measures – Milestones)	The MS4 Permit requires that the WMP provide specificity with regard to structural and non-structural BMPs, including the number, type, and location(s), etc. adequate to assess compliance. In a number of cases, additional specificity on the number, type and general location(s) of watershed control measures as well as the timing of implementation for each is needed. (Regional Water Board staff notes, for example, that many watershed control measures in the implementation schedule only reference the year (or years) that a measure or milestone will be implemented. This should be revised to include more specific and/or exact dates where appropriate.) Additionally, many watershed control measures in the implementation schedule are ongoing measures that are not new interim milestones (e.g. MCMs, implementation of SB 346, enhanced street sweeping, etc.). For transparency, Regional Water Board staff recommends that ongoing measures clearly be separated from interim milestones for structural controls and non-structural BMPs in the implementation schedule. Regional Water Board staff recognizes uncertainties may complicate establishment of specific implementation dates, however there should at least be more specificity on actions within the current and next permit terms to ensure that the following interim requirements are met: (1) a 10% reduction in metals loads during wet weather and a 30% reduction in dry weather by 2017 and (2) a 35% reduction in metals loads during wet weather and a 70% reduction during dry weather by 2020.
Part VI.C.5.b.iv.(4)(c) (Watershed Control Measures – SB 346 Copper Reductions)	The draft WMP appears to rely mostly on the phase-out of copper in automotive brake pads, via approved legislation SB 346, to achieve the necessary copper load reductions. Given the combination of other Cu sources identified in various LA TMDLs such as building materials, other vehicle wear, air deposition from fuel combustion and industrial facilities, and that SB 346 progressively phases out Cu content in brakes of new cars (5% by weight until 2021, 0.5% by weight until 2025), then other structural and non-structural BMPs may still be needed to reduce Cu loads sufficiently to achieve compliance deadlines for interim and/or final WQBELs.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Limiting Pollutant)	The RAA identifies zinc as the limiting pollutant and notes that this pollutant will drive reductions of other pollutants. If the Group believes that that this approach demonstrates that activities and control measures will achieve applicable receiving water limitations, it should explicitly state and justify this for each category 1, 2, and 3 pollutant.
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – New Non-Structural Controls)	The draft assumes a 10% pollutant reduction from new non-structural controls. Although 10% is a modest fraction of the overall controls necessary, additional support for this assumption should be provided, particularly since the group appears to be relying almost entirely on these controls for near-term pollutant reductions to achieve early interim milestones/deadlines. Additionally, as part of the adaptive management process, the Permittees should commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not supported.
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Irrigation Reductions)	For dry weather, the WMP assumes a 25% reduction in irrigation (RAA, section 7.1.2). Additional support should be provided for this assumption, particularly since the group appears to be relying almost entirely on this non-structural BMP for near-term pollutant reductions to meet early interim milestones/deadlines. Additionally, as part of the adaptive management process, the Permittees need to commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not supported.
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Regional BMPs)	Section 1.4.2 of Attachment A to the RAA points out that additional potential regional BMPs were identified to provide the remaining BMP volume noted in Table 9-4. It indicates they can be found in Section 4 of the WMP (actually, they are found in Section 3). The RAA should clarify that sufficient sites were identified so that the remaining necessary BMP volume can be achieved by those sites that were not "excluded for privacy."

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Permitted Industrial Facilities)	The draft WMP, including the RAA, excludes stormwater runoff from non-MS4 facilities within the WMA from the stormwater treatment target. In particular, industrial facilities that are permitted by the Water Boards under the Industrial General Permit or an individual stormwater permit were identified and subtracted from the treatment target. Regional Water Board staff recognizes that this was done with the assumption that these industrial facilities will retain their runoff and/or eliminate their cause/contribution to receiving water exceedances, as required by their respective NPDES permit. However, it is important that the Group's actions under its Industrial/Commercial Facilities Program—including tracking critical industrial sources, educating industrial facilities regarding BMP requirements, and inspecting industrial facilities—ensure that all industrial facilities are implementing BMPs as required.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis – Caltrans Facilities)	The draft WMP, including the RAA, takes a similar approach for areas under the jurisdiction of the California Department of Transportation (Caltrans). Caltrans facilities that are permitted under the Caltrans MS4 permit (Order No. 2012-0011-DWQ) were also identified and subtracted from the treatment target. It should be noted that the Amendment to the Caltrans Permit (Order WQ 2014-0077-DWQ) includes provisions to address TMDL requirements throughout the state. Revisions to Attachment IV of the Caltrans Permit require that Caltrans prioritize all TMDLs for implementation of source control measures and BMPs, with prioritization being "consistent with the final TMDL deadlines to the extent feasible." Additionally, the Caltrans Permit also includes provisions for collaborative implementation through Cooperative Implementation Agreements between Caltrans and other responsible entities to conduct work to comply with a TMDL. By contributing funds to Cooperative Implementation Agreements and/or the Cooperative Implementation Grant Program, Caltrans may receive credit for compliance units, which are needed for compliance under the Caltrans Permit. In a similar manner, the LA County MS4 Permit includes provisions for Permittees to control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other MS4 owners—such as Caltrans—to successfully implement the provisions of the Order (see Parts VI.A.2.a.viii and VI.A.4.a.iii). Therefore, the Group should ensure that it is closely coordinating with appropriate Caltrans District staff regarding the identification and implementation of watershed control measures to achieve water quality requirements (i.e. applicable Receiving Water Limitations and WQBELs). Regional Water Board staff recognizes that the Group has taken the initial steps for such collaboration since Caltrans participates in the Group.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b.iv.(4)(a) (Watershed Control Measures, page 63)	In Section 3.4.1.1, the draft WMP states, "[a]s recognized by the footnote in Attachment K-4 of the Permit, the Participating Agencies have entered into an Amended Consent Decree with the United States and the State of California, including the Regional Board, pursuant to which the Regional Board has released the Participating Agencies from responsibility for toxic pollutants in the Dominguez Channel and the Greater Los Angeles and Long Beach Harbors." This statement misinterprets the Regional Water Board's findings. Footnote 1 to Table K-4 of the LA County MS4 Permit states, "[t]he requirements of this Order to implement the obligations of this TMDL do not apply to a Permittee to the extent that it is determined that the Permittee has been released from that obligation pursuant to the Amended Consent Decree entered in United States v. Montrose Chemical Corp., Case No. 90-3122 AAH (JRx)." As stated in the responses to comments received on the Dominguez Channel and Greater Harbor Waters Toxic Pollutants TMDL, "...primarily one pollutant, DDT, is associated with the Superfund site and also addressed by the TMDL. The TMDL addresses numerous pollutants and utilizes a different process than Superfund. The other pollutants – heavy metals, PAHs, PCBs and other legacy pesticides are not within Superfund's focus at the Montrose OU2 Site..." Further, the WQBELs in Attachment P, Part E of the LA County MS4 Permit and Part VIII.P of the Long Beach MS4 Permit are for ongoing discharges from the MS4, not for the historic contamination of the bed sediments. Therefore, the statement in the draft WMP incorrectly concludes that the aforementioned Consent Decree releases MS4 Permittees from any obligation to implement the WQBELs in the MS4 permits.
Part VI.C.5.b.iv.(6) (Legal Authority)	Appendix 7 to the draft WMP includes a copy of legal certifications for all Group members except for Long Beach. The legal certification for Long Beach should be submitted in the revised WMP.

LA County MS4 Permit Provision*	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.c (Compliance Schedules)	Page 6-1 notes that "[t]he final non-TMDL water quality standard compliance date is projected to be sometime in 2040." However, the pollutant reduction plan milestones in Section 5 only appear to go up to the year 2026. For watershed priorities related to addressing exceedances for receiving water limitations, the permit requires milestones based on measureable criteria or indicators, a schedule with dates for achieving the milestones, and a final date for achieving the receiving water limitations as soon as possible. These need to be included in the revised WMP.

* Equivalent provisions are also found in the Long Beach MS4 Permit

TO: Lower San Gabriel River Watershed Management Group

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 30, 2014

SUBJECT: COMMENTS ON REASONABLE ASSURANCE ANALYSIS FOR LOWER SAN GABRIEL RIVER WATERSHED MANAGEMENT AREA

This memorandum contains comments on the Reasonable Assurance Analysis (RAA), dated June 6, 2014, which was submitted by the Lower San Gabriel River Watershed Management Group.

A. General comments on the draft Reasonable Assurance Analysis section (Section 4 and Appendix A-4-1) of the Watershed Management Program.

1. The Lower San Gabriel River Watershed Management Area (LSGR WMA) is subject to interim and final water quality-based effluent limitations pursuant to Attachment P, Part A "San Gabriel River Metals and Impaired Tributaries Metals and Selenium TMDL" for both wet and dry weather conditions. The LSGR WMA is required to analyze a strategy to implement pollutant controls necessary to achieve applicable interim and final water quality-based effluent limitations for metals and selenium consistent with the interim and final implementation deadlines in the Basin Plan Amendment, Resolution No. R13-004 - Implementation Plan for the TMDLs for Metals and Selenium in the San Gabriel River and Impaired Tributaries. These include:

   - By September 30, 2017, for WQBELs applicable in wet weather a 10% reduction, and dry weather a 30% reduction in the difference between current pollutant loads and the WQBEL.
   - By September 30, 2020, for WQBELs applicable in wet weather a 35% reduction, and in dry weather a 70% reduction in the difference between current pollutant loads and the WQBEL.

   As proposed in the WMP, the 10% load reduction was assumed to result from the cumulative effect of nonstructural BMPs. There is uncertainty in the ability of these BMPs to meet the required reductions by September 2017. Additional support for the anticipated pollutant load reductions from these non-structural BMPs and source control measures over the next two to three years should be provided to increase the confidence that these measures can achieve the near-term interim WQBELs by September 2017.

2. Section 5 Compliance Schedule of the draft Watershed Management Plan only provided implementation schedule for non-structural targeted control measures up to 2017. The LSGR Watershed Management Group must provide measureable milestones for implementing each one of the proposed control measures that will allow an assessment of progress toward the interim and final WQBELs and receiving water limitations every two years.

3. LSGR WMA is also subject to Category 2 priority pollutants, including coliform bacteria. The LSGR WMP proposes to address bacteria with the same runoff reduction and stormwater capture measures proposed for Category 1 pollutants as well as ongoing implementation of minimum control measures. However, this might not be sufficient to reduce bacteria loading to the required levels. The LSGR WMP acknowledges that it will address bacteria more directly during the second and third adaptive management cycles. The LSGR WMP should include a more specific strategy to implement pollutant controls necessary to address this and other Category 2 pollutants prior to the second and third adaptive management cycles.

B. Modeling comments regarding analysis of copper, lead, zinc, DDT, PCB, PAH, and bacteria concentrations/loads:

1. The model predicted stormwater runoff volume is used as a surrogate for required pollutant load reductions for wet weather conditions. Thus, the predicted flow volume becomes a very important parameter for evaluating required volume reductions and BMP scenarios. Based on the results of the hydrology calibration shown in Table 4-3, the error difference between modeled flow volumes and observed data is 19% for the Lower San Gabriel River. The higher error percentage could be due to the exclusion of contributions of flow volume from upstream. For calibration purposes, upstream flow volume should be included to determine whether that improves the model performance to within the "Good" or "Very Good" range, per the RAA Guidelines. Once model calibration has been completed, the upstream flow volume can then be excluded when presenting the volume reduction targets in Tables 8-3 to 8-4.

2. While we understand that there is significant reliance on a volume-based approach, the predicted baseline concentrations and loads for all modeled pollutants of concern, including TSS, should be presented in summary tables for wet weather conditions. This model output should be available, since it is the basis for the percent reductions in pollutant load presented in Table 5-6. (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

3. Further, the differences between baseline concentrations/loads and allowable concentrations/loads should be presented in time series for each pollutant under long-term continuous simulation and as a summary of the differences between pollutant concentrations/loads and allowable concentrations/loads for the critical wet weather period. (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

4. We note that modeling was not conducted for organics (DDT, PCBs, and PAHs). It is not clear why these pollutants were not modeled or why previous modeling of these pollutants could not be used, such as that conducted during the development of the

Dominguez Channel and Greater LA and Long Beach Harbor Waters Toxic Pollutants TMDL. An explanation for the lack of modeling is needed.

5. The report presents the existing runoff volumes, required volume reductions and proposed volume reductions from BMP scenarios to achieve the 85th percentile, 24-hour volume retention standard for each major watershed area (e.g., LLAR, LCC and LSGR) and by jurisdiction. The same information on the runoff volume associated with the 85th percentile, 24-hour event and the proposed runoff volume reduction from each BMP scenario also needs to be presented for each modeled subbasin (e.g., a series of tables similar to 8-3 and 8-4 and 9-6 and 9-7). See Table 5 of the RAA Guidelines. Additionally, more explanation is needed as to what constitutes the "incremental" and "cumulative" critical year storm volumes in tables 9-6 and 9-7 and how these values were derived from previous tables.

6. The report needs to present the same information, if available, for non-stormwater runoff. Alternatively, the report should include a commitment to collect the necessary data in each watershed area, through the non-stormwater outfall screening and monitoring program, so that the model can be re-calibrated during the adaptive management process to better characterize non-stormwater flow volumes and to demonstrate that proposed volume retention BMPs will capture 100 percent of non-stormwater that would otherwise be discharged through the MS4 in each watershed area.

7. The ID number for each of the subwatersheds from the model input file should be provided and be shown in the simulation domain to present the geographic relationship of subwatersheds, within each watershed area, that are simulated in the LSPC model.

October 27, 2014

Los Angeles River Upper Reach 2 Watershed
Management Group
(See Distribution List)

REVIEW OF THE LOS ANGELES RIVER UPPER REACH 2 WATERSHED MANAGEMENT GROUP'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Los Angeles River Upper Reach 2 Watershed Management Group:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 26, 2014 by the Los Angeles River Upper Reach 2 Watershed Management Group. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County Permit and must be approved by the Regional Water Board.

As stated above, on June 26, 2014, the Los Angeles River Upper Reach 2 Watershed Management Group submitted a draft Watershed Management Program (WMP) for their entire jurisdiction to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, some revisions to the Los Angeles River Upper Reach 2 Watershed

Management Group's draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2, respectively. The specific Permit provisions cited in the enclosures refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which necessary revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Board comments identified in the enclosures, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 27, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft LA River Upper Reach 2 WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov.

If the necessary revisions are not made, the Los Angeles River Upper Reach 2 Watershed Management Group will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachments O and P pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft WMP is approved, the Los Angeles River Upper Reach 2 Watershed Management Group is required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii);
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters; and
(d) Implement watershed control measures to ensure that MS4 discharges are achieving compliance with final WQBELs for the Los Angeles River Nitrogen Compounds and Related Effects TMDL, and interim and final WQBELs for the Los Angeles River Trash TMDL pursuant to Part VI.E and set forth in Attachment O consistent with the compliance deadlines therein.

In addition on June 26, 2014, the Los Angeles River Upper Reach 2 Watershed Management Group submitted a draft Coordinated Integrated Monitoring Program (CIMP) to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures:
Attachment 1 Comments and Necessary Revisions to Draft WMP
Attachment 2 Comments on Reasonable Assurance Analysis for the Los Angeles River Upper Reach 2 Watershed Management Group

cc: Mr. Gerry Greene, CWE

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Los Angeles Regional Water Quality Control Board

Attachment to October 27, 2014 Letter Regarding the Los Angeles River Upper Reach 2 Watershed Management Group's Draft Watershed Management Program (WMP) Submittal Pursuant to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Comments and Necessary Revisions to Draft WMP

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.a.ii. Waterbody-Pollutant Classification (page 59)	The Group must identify and address Category 3 Waterbody-Pollutant Combinations (WBPCs). The water quality monitoring data from the sites located downstream is appropriate to use to characterize the receiving water quality in the vicinity of the Group's watershed area. The Group can use its monitoring data once available to confirm whether the Category 3 WBPCs are appropriate or whether the list should be modified. Regional Water Board staff note that Table 2-7 identifies several pollutants as Category 3; however, the reasonable assurance analysis (RAA) does not address these nor does the draft WMP analyze load reductions for these pollutants from the proposed watershed control measures. The revised WMP must include a discussion of the Category 3 pollutants identified in Table 2-7, and provide a similar analysis to what is provided for Category 1 pollutants.
Part VI.C.5.a.iii. Source Assessment (page 59-60)	• The draft WMP, including the RAA, excludes stormwater runoff from non-MS4 facilities within the WMA from the stormwater treatment target. While the draft WMP inventories General Industrial Facilities within the watershed management area, the WMP should utilize General Industrial Storm Water Permittee monitoring results (available from SMARTS) to assess and potentially refine estimates of pollutant loading from the identified "non-MS4" areas. In addition to General Industrial Storm Water Permittee monitoring results, Permittees should also review their inspection findings, including past violations and enforcement actions, of Industrial/Commercial facilities to assess potential pollutant sources. • Although the RAA includes modeling to assess existing loads overall, the source assessment (Section 2.3) does not use modeling to evaluate specific sources. The draft WMP does refer to statements included in the various TMDLs applicable to the watershed area, but there is no indication that the model results from the different TMDLs were used in the pollutant source assessment. The draft WMP should consider existing TMDL modeling data, where available, when refining the source assessment. • A process and schedule for developing the required spatial information on catchment areas to major outfalls should be proposed, if this information does not already exist. (Regional Water Board staff note that Figure 1-5 in the CIMP provides a map of the MS4 including some outfalls. Additional information on outfalls and controls is provided in Appendices A and B of the CIMP as well as Appendix G to the draft WMP itself; this appears to be a good start in responding to the permit requirements. If additional information such as the catchment areas for the major outfalls still needs to be developed, the process and schedule for developing this should be indicated.)
Part VI.C.5.a.iv. Prioritization (page 60)	While Table 2-7 acknowledges the past due dates for the Los Angeles River Nitrogen Compounds and Related Effects TMDL and final deadlines for the LA River Metals TMDL, LA River Bacteria, and other TMDLs, the LA River Metals TMDL includes interim dry and wet weather limitations with a deadline (2012) that has passed. The WMP needs to specify why this TMDL is not included in Table 2-7 in the priority 1a category (highest priority), since some compliance deadlines have already passed.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64)	<u>Selection of Watershed Control Measures to Comply with Interim WQBELs and Associated Compliance Deadlines</u> • The draft WMP does not clearly specify a strategy to comply with the interim WQBELs for the LA River metals TMDL (January 11, 2012; January 11, 2020 and January 11, 2024 deadlines). Table 3-1 presents a phased implementation plan, which suggests that Phase 2 activities will be conducted to meet the 2020 deadline and Phase 3 activities, to meet the 2024 deadline; however, the draft WMP needs to be revised to include documentation that the 2012 past deadlines have been achieved or specify an appropriate strategy for achieving compliance with the past due interim WQBELs. • Further discussion of current compliance with the LA River nitrogen compounds TMDL, for which there is a final compliance deadline of 2004, is also needed, since this is a priority 1a pollutant in Table 2-7. Section 1.3.3 of the CIMP notes that MS4 discharges appear to comply with applicable loads already, but additional discussion and support for this assertion should be included in the WMP itself. • The draft WMP is unclear on a schedule for BMPs implemented to comply with the LA River Trash TMDL. The draft Plan states, Most of the cities are 90 percent or more compliant with the trash TMDL and are investigating opportunities to complete this implementation effort. The draft WMP needs to include a firm schedule for the implementation of Trash TMDL BMPs. <u>Support for Use of Limiting Pollutants</u> • The draft WMP states, "[t]he limiting pollutant used to control the implementation efforts of the LAR UR2 WMA is bacteria for the area draining to the Los Angeles River and metals for the area draining to the Rio Hondo." The draft WMP needs to clarify and provide support for the assumption that Category 2 and Category 3 pollutants will be addressed by focusing on these limiting pollutants. • Alternatively, if Category 2 and 3 pollutants will not be addressed by focusing on the limiting pollutants, identified above, the WMP must separately address Category 2 and Category 3 pollutants. <u>Specificity of Proposed Watershed Control Measures</u> • Although the draft WMP includes several specific regional BMPs (Section 4.3.3.3) the specific LID street projects and their locations are not identified. The draft WMP should provide as much specificity as feasible in describing the potential locations for LID streets. Additionally, the permittees that would be responsible for implementing LID street projects should be specified. Specificity is particularly important where LID streets are relied upon to achieve some of the pollutant reductions necessary to achieve interim WQBELs with compliance deadlines in this permit term and the next permit term. <u>Legal Authority</u> • The draft WMP asserts that the "legal authority demonstration in respect to the WMP appears more specific than that required in the Annual Report." The Plan appears to acknowledge appropriate legal authority to construct most projects but note that some of the proposed projects are located within property easements owned by other entities. The draft WMP needs to provide greater detail regarding the Group's legal authority. <u>Adaptive Management Process</u> • While the draft WMP notes revisions will occur as part of the "Adaptive Management Process" in referral to multiple proposed actions it does not include a comprehensive strategy for the Adaptive Management process. The draft WMP should provide more detail on how the "Adaptive Management Process" will be implemented.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64)	<u>Assumptions regarding Non-structural BMPs and Source Control Measures</u> • The draft WMP assumes a 5% load reduction from non-structural BMP enhancements. However, Section 3.3.1 of the WMP only indicates that such enhancements would be considered, and a firm commitment to implement them is lacking. The draft WMP needs to include specific commitments to implement the non-structural BMP enhancements, or it should not rely upon the 5% load reduction anticipated from these non-structural BMP enhancements to meet compliance deadlines in this permit term or the next permit term. • The WMP assumes a significant reduction in copper based on the phase-out of copper in automotive brake pads, via approved legislation SB346, to achieve the necessary copper load reductions. Given the combination of other copper sources identified in various LA TMDLs such as building materials, other vehicle wear, air deposition from fuel combustion and industrial facilities, and that SB346 progressively phases out copper content in brakes of new cars (5% by weight until 2021, 0.5% by weight until 2025), additional structural BMPs may still be needed to reduce copper loads prior to entering receiving waters and eliminate copper exceedences of RWLs. <u>Assumptions regarding Pollutant Loading from Permitted Industrial Facilities</u> • The draft WMP, including the RAA, excludes stormwater runoff from non-MS4 facilities within the WMA from the stormwater treatment target. In particular, industrial facilities that are permitted by the Water Boards under the Industrial General Permit or an individual stormwater permit were identified and subtracted from the treatment target. Regional Water Board staff recognizes that this was done with the assumption that these industrial facilities will eliminate their cause/contribution to receiving water exceedances, as required by their respective NPDES permit. However, it is important that the Group's actions under its Industrial/Commercial Facilities Program—including tracking critical industrial sources, educating industrial facilities regarding BMP requirements, and inspecting industrial facilities—ensure that all industrial facilities are implementing BMPs as required.
Reasonable Assurance Analysis – Category 1 Pollutants Part VI.C.5.b.iv.(5)	See attached memorandum with specific comments on the Group's Reasonable Assurance Analysis for Category 1 pollutants.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment and Necessary Revision
Reasonable Assurance Analysis – Categories 2 and 3 Pollutants Part VI.C.5.b.iv.(5)	The WMP did not model any pollutants in Categories 2 and 3. These pollutants or surrogates need to be included in the RAA, or supported justification for the use of the proposed limiting pollutants as surrogates for each Category 2 and Category 3 waterbody-pollutant combination.

Los Angeles Regional Water Quality Control Board

TO: Los Angeles River Upper Reach 2 Watershed Management Group

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 27, 2014

SUBJECT: COMMENTS ON SECTION 4, REASONABLE ASSURANCE ANALYSIS, OF THE DRAFT WATERSHED MANAGEMENT PROGRAM FOR THE LOS ANGELES RIVER UPPER REACH 2 WATERSHED MANAGEMENT AREA

This memorandum contains comments on Section 4, Reasonable Assurance Analysis, of the draft Watershed Management Program, dated June 26, 2014, which was submitted by the Los Angeles River Upper Reach 2 Management Group.

A. General comments on the draft Reasonable Assurance Analysis (RAA) section of the Watershed Management Program.

1. The LA County MS4 Permittees in the Los Angeles River Upper Reach 2 Watershed Management Area are subject to interim and final water quality-based effluent limitations pursuant to Attachment O, Part A "Los Angeles River Watershed Trash TMDL", Part B "Los Angeles River Nitrogen Compounds and Related Effects TMDL", Part C "Los Angeles River and Tributaries Metals TMDL", and Part D "Los Angeles River Watershed Bacteria TMDL". Note that Table 1-5 on page 15 of the draft WMP should be updated to include the effective date for revisions to the Los Angeles River Nitrogen Compounds and Related Effects TMDL, which is August 7, 2014.

2. The water quality monitoring data for the Los Angeles River Upper Reach 2 water body segments were gathered, assessed, and analyzed for both wet and dry weather in the draft WMP. Selected monitoring sites include LAR 008 30, LAR1-9, LAR1-10, and LALT500 which are located in Los Angeles River Reach 2, near or below confluence of Rio Hondo Reach 1 and above the confluence of Compton Creek. These sampling locations are suitable to represent the receiving water quality for the Los Angeles River Upper Reach 2 watershed management area. All data were analyzed to identify exceedances of water quality objectives and should be used to identify Category 3 priority pollutants. The draft WMP should be revised to include Category 3 waterbody-pollutant combinations based on the data that were already analyzed in the draft WMP. Pursuant to Section VI.C.5.a., the WMP should identify potential sources, strategies, control measures and BMPs to address Category 3 priority pollutants, as required. Category 3 WBPCs can be revised once monitoring data have been collected, through the adaptive management process.

The concentration-based WQBELs for metals listed on page 78 of the WMP are incorrect and should not be used to set allowable loads. The correct concentration-based WQBELs for metals, which can be used in lieu of calculating allowable loads during dry weather, are identified in Attachment O, Part C.2.c. The load-based WQBELs for metals applicable during wet weather, which are identified in Attachment O, Part C.2.d of the permit should be used to calculate the allowable load and required reduction for metals during wet weather conditions. In summary, allowable pollutant loadings should be calculated separately for wet and dry weather using the WQBELs listed in Attachment O, Parts C.2.c and C.2.d of the permit. Loads must be expressed as daily loads, consistent with the expression of the WQBELs; Table 4-4 should be revised to specify that the loads presented are daily loads.

3. Allowable loads for metals based on the required WQBELs and potential WER / SSO values for copper and lead should be presented clearly and separately in Section 4.3.1.3 of the WMP, since the copper WERs and recalculated lead values have not been approved by the Regional Water Board as of this time. If concentration-based WQBELs are selected to be used to calculate the allowable loads, and these allowable loads are different from the mass-based WQBELs listed in Attachment O, the WMP should provide a clear explanation on how the proposed concentration-based WQBELs and allowable loads were derived from the WQBELs in Attachment O.

B. Modeling comments regarding analysis of copper, lead, zinc, nitrogen and bacteria concentrations/loads:

1. The model predicted loads presented in Table 4-3 for the baseline condition are not consistent with those results directly from model output (see Figures A and B, for example). These discrepancies could be due to the usage of the 90th percentile year for the predicted results of pollutant loads. Further, all model results of pollutant loads are presented in terms of lbs/year in Table 4-3 through Table 4-6. However, the results for the RAA should be presented in units consistent with the expression of each of the WQBELs in Attachment O of the MS4 Permit.

2. For the baseline condition, the model predicted runoff volume and the concentrations for copper, lead, zinc, nitrogen, and bacteria should also be presented in Table 4-3 for the wet weather condition. For cadmium, no model results are included in Table 4-3. An explanation is needed for the exclusion of cadmium from the modeling, or alternatively, supporting documentation/analysis to demonstrate that the model results for copper, lead and zinc or total sediment adequately represent the baseline condition and required reduction for cadmium.

3. The differences between baseline concentrations/loads and allowable concentrations/loads should be presented in a time series for each pollutant under long term continuous simulation and then as a summary of 90th percentile of the differences between pollutant concentrations/loads and allowable concentrations/loads for wet weather periods, in units consistent with the applicable WQBELs and Receiving Water Limitations (e.g., mass or number per day), instead of using the predicted results of selected year presented only as an annual reduction in load to represent for load reduction target. In addition, a detailed explanation should be provided of the calculations used to derive the target load reductions.

4. The report used a pollutant load-based approach to evaluate BMP performance and compliance with applicable WQBELs for wet weather conditions. However, the report should also provide predicted concentrations in the receiving water or at the downstream outlets under the BMP scenarios. Additionally, Table 4-17 to Table 4-20 need to be revised to clarify the units for the values presented in each table. Finally, it appears that model output is only provided for final compliance deadlines. Model output should also be provided for phased BMP implementation to demonstrate that interim WQBELs for metals and bacteria will be met.

5. The ID number for each of the 50 subwatersheds from the model input file should be provided and be shown in the simulation domain to present the geographic relationship of the subwatersheds within the watershed area that are simulated in the LSPC model.

6. The flow, runoff volume and water quality (pollutant concentration and pollutant mass) time series output at the watershed outlet as well as for each modeled subbasin should be provided using the 90th percentile critical condition consistent with the expression of the WQBELs in Attachments N and O to estimate the baseline condition. In addition, per RAA Guidelines, the model output should include stormwater runoff volume and pollutant concentration/load at the outlet and for each modeled subbasin for each BMP scenario as well (see Table 5. Model Output for both Process-based BMP Models and Empirically-based BMP Models, pages 20-21 of the RAA Guidelines).

7. Model simulation for copper, lead, zinc, nitrogen, and bacteria under the dry weather condition was not included in the Report and needs to be addressed.

8. The report did not describe how the model was calibrated, including calibration results compared to calibration criteria in Table 3.0 of the RAA Guidelines, and no historical hydrology and water quality monitoring data were used for comparison with the model results for the baseline prediction. According to Part G, pages 12-13 of the RAA Guidelines, model calibration is necessary to ensure that the model can properly assess all the variables and conditions in a watershed system.

9. The identification of the 90th percentile years in Table 4-2 needs to be supported by presenting historical hydrological data to demonstrate the selected critical period will capture the variability of rainfall and storm sizes/conditions. The input rainfall should be also presented in the report along with the historical precipitation frequency analysis for wet days and rainfall depth.

October 27, 2014

Dr. Shahram Kharaghani
City of Los Angeles
Department of Public Works, Bureau of Sanitation
Watershed Protection Division
1149 South Broadway, 10th Floor
Los Angeles, CA 90015

Ms. Gail Farber, Chief Engineer
Los Angeles County Flood Control District
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

REVIEW OF THE DRAFT WATERSHED MANAGEMENT PROGRAM FOR THE CITY OF LOS ANGELES AREA IN SANTA MONICA BAY JURISDICTIONAL GROUP 7 SUBWATERSHED, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Dr. Kharaghani and Ms. Farber:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 27, 2014 by the City of Los Angeles and Los Angeles County Flood Control District (LACFCD) for the City of Los Angeles' land area and the LACFCD's infrastructure within Jurisdictional Group 7 of the Santa Monica Bay Watershed Management Area. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of storm water and non-storm water to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County MS4 Permit and must be approved by the Regional Water Board.

As stated above, on June 27, 2014, the City of Los Angeles (City) and the LACFCD submitted a draft Watershed Management Program (WMP) for the City's land area and the LACFCD's

infrastructure within Jurisdictional Group 7 (JG7) of the Santa Monica Bay (SMB) Watershed Management Area (WMA) to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit for the City's land area and the LACFCD's infrastructure within JG7 of the SMB WMA. However, some revisions to the City's and LACFCD's draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP are found in Enclosure 1. The specific Permit provisions cited in the enclosure refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Water Board comments, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosure to this letter and submit the revised WMP as soon as possible and no later than **January 27, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised SMB JG7 WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Rebecca.Christmann@waterboards.ca.gov.

If the necessary revisions are not made, the City and the LACFCD will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment M pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft SMB JG7 WMP is approved, the City and LACFCD are required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii); and
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters.
(d) Implement watershed control measures, where possible from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash WQBELs and all other final WQBELs and receiving water limitations pursuant to Part VI.E and set forth in Attachment M by the applicable compliance deadlines occurring prior to approval of the WMP.

In addition on June 27 2014, the City and the LACFCD submitted a draft Coordinated Integrated Monitoring Program (CIMP) for the SMB JG7 WMA to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Ms. Rebecca Christmann of the Storm Water Permitting Unit by electronic mail at Rebecca.Christmann@waterboards.ca.gov or by phone at (213) 576-5734. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Chief Deputy E.O.
for

Samuel Unger, P.E.
Executive Officer

cc: Donna Chen, City of Los Angeles
Hubertus Cox, City of Los Angeles
Hamid Tadayon, City of Los Angeles
Angela George, Los Angeles County Flood Control District

Enclosure: Summary of Comments and Required Revisions

Attachment to October 27, 2014 Letter Regarding the Draft Watershed Management Program for the City of Los Angeles Area in Santa Monica Bay Jurisdictional Group 7 Subwatershed, Pursuant to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Summary of Comments and Required Revisions to the Draft Watershed Management Program

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
Part VI.C.5.a.i Water Quality Characterization	The geographical scope of this WMP is the City of Los Angeles' land area and the LACFCD's infrastructure within Santa Monica Bay (SMB) Jurisdictional Group 7 (JG7) subwatershed. It appears that there are 4 shoreline monitoring locations (SMB 7-06 though SMB 7-09) adjacent to the City's area within SMB JG7, which includes Point Fermin Park Beach. Point Fermin Park Beach should be included in the bulleted list in Section 2.1. The WMP needs to include and evaluate the monitoring data from sampling location SMB 7-7 prior to the landslide in 2009, which is the only point zero sampling point, and the geometric mean data for all sampling locations. In addition, the WMP needs to analyze all available Bight data, in order to determine if there were exceedances of receiving water limitations besides PCBs and DDTs, Basin Plan objectives or the Screening Levels as listed in Attachment G of the LA MS4 Permit.
Parts VI.C.5.a.ii(1) and iv(1) Water Body-Pollutant Classification	For completeness, the WMP could address the 303(d) listing of *Fish Consumption Advisory* as a footnote to Table 2-8 associated with the pollutants, DDTs and PCBs.
Part VI.C.5.a.ii(2) and iv(2) Water Body-Pollutant Classification	The WMP needs to include a discussing of why sediment toxicity is not included as a Category 2 WBPC. The City and LACFCD could cite USEPA's recommendation that SMB not be identified as impaired by sediment toxicity in the next 303(d) List and provide data to support delisting. In addition, in Section 2.1.5, the WMP needs to discuss what data was evaluated and how the Permittees evaluated the available water quality data for water body-pollutant combinations that would fall into Category 2. It is assumed that the same Bight data that was evaluated for Category 3 pollutants could be used to evaluate whether there are exceedances of any pollutant that would meet the State's listing criteria.
Part VI.C.5.a.ii(3) and iv(2) Water Body-Pollutant	The draft WMP states, "The only TMDL sediment-based targets applicable to the SMB JG7 WMP area are for DDTs and PCBs;

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
Classification	therefore, DDTs and PCBs are the only analytes included in this analysis." However, the purpose of the water quality characterization is to identify other potential pollutants of concern, not just those that are already being addressed. The sediment data from 2003 and 2008 should be further evaluated to identify if there are other sediment bound pollutants at concentrations of concern in the area offshore from the SMB JG7 WMP area.
Part VI.C.5.a.iii Source Assessment	The WMP needs to include a source assessment regarding known and suspected storm water and non-storm water pollutant sources in discharges to the MS4 and from the MS4 to receiving waters. The source assessment should include (1) a discussion of findings from implementation of the minimum control measures under the 2001 Permit; (2) a discussion of the data and conclusions from the TMDL source investigations; and (3) known or suspected sources of storm water and non-storm water pollutants, which may cause or contribute to the water quality exceedances which have been observed at the shoreline monitoring sites.
Part VI.C.5.a.iii.(1)(b) Source Assessment	The WMP needs to identify on a map the City's and LACFCD's catch basins and major outfalls. Regional Water Board staff is aware that the CIMP (Figure 3, Table 12 and Attachment C) identifies outfalls to SMB. However, the WMP should include this information as well.
Part VI.C.5.a.iv.(1) Prioritization	Section 4.1, page 28 of the draft WMP reports to be in compliance with the SMB bacteria TMDL. However, Table 2-6 clearly shows that the allowable exceedance days have been exceeded. The revised WMP needs to discuss the cause of these exceedances. The City and LACFCD will meet the interim and final WQBELs for trash by retrofitting all catch basins in the City's and LACFCD's area of Santa Monica Bay JG7 with full capture devices. The revised WMP needs to clarify if 218 or 220 catch basins will be retrofitted.
Part VI.C.5.b.ii.(1) Selection of Watershed Control Measures	The WMP needs to specify a strategy that will be implemented to prevent or eliminate non-storm water discharges, if necessary based on the findings of the non-storm water screening program.
Part VI.C.5.b.iv.(4)(b)-(e) Selection of Watershed Control Measures	The draft WMP states that all catch basins will be retrofitted by 2016, ahead of the 2020 compliance deadline; however, the WMP needs to provide a schedule that demonstrates that the required 20% load reduction in debris will be achieved by the interim compliance deadline of March 20, 2016. The revised WMP needs to provide more specificity with regards to the schedule, location and agencies responsible for retrofitting the catch basins with full capture devices throughout the JG7 WMP area.
Part VI.C.5.b.iv.(5) Reasonable Assurance Analysis	A reasonable assurance analysis was not performed. As stated in the draft WMP, "For the SMB JG7 WMP, there are currently zero required load reductions for the Category 1 WBPCs: bacteria at the Santa Monica Bay Beaches and PCBs/DDTs in the Santa Monica Bay. Compliance with the Trash TMDL is being demonstrated through

LA County MS4 Permit Provision	Summary of Comments and Necessary Revisions
	retrofitting of catch basins as outlined in the Trash Monitoring and Reporting Program. …Therefore, no quantitative RAA modeling is required for this WMP."
Part VI.C.5.b.iv.(6) Legal Authority	The City and the LACFCD need to provide documentation that they have the legal authority to implement the Watershed Control Measures identified in the WMP, which includes the MCMs.
Part VI.C.5.c Compliance Schedules	the draft WMP did not develop a compliance schedule for the USEPA promulgated SMB TMDLs for DDT and PCBs, as required by the LA County MS4 Permit. Since this TMDL does not have a State-adopted implementation plan and further since the WLAs are based on existing conditions, the compliance deadline is immediate. The JG7 group should ensure that monitoring data are collected to demonstrate compliance with the applicable WQBELs.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

October 21, 2014

Ms. Melissa Barcelo
Community Services Division
City of Walnut
21201 La Fuente Road
Walnut, CA 91789

REVIEW OF THE CITY OF WALNUT'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Ms. Barcelo:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 28, 2014 by the City of Walnut. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County Permit and must be approved by the Regional Water Board.

As stated above, on June 28, 2014, the City of Walnut submitted a draft Watershed Management Program (WMP) to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, some revisions to the City's draft WMP are necessary. The Regional

Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2, respectively. The specific Permit provisions cited in the enclosures refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which necessary revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Board comments identified in the enclosures, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 21, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft Walnut WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Chris.Lopez@waterboards.ca.gov.

If the necessary revisions are not made, the City will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment P pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft Walnut WMP is approved, the City is required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii); and
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters.

In addition on June 28, 2014, the City submitted a draft Integrated Monitoring Program (IMP) to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft IMP will be provided under separate cover.

If you have any questions, please contact Mr. Chris Lopez of the Storm Water Permitting Unit by electronic mail at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures:
Comments and Necessary Revisions to Draft WMP
Comments on Reasonable Assurance Analysis Report for City of Walnut

cc: Cody Howing, Assistant Engineer, RKA Consulting Group

Attachment to October 21, 2014 Letter Regarding the City of Walnut's Draft Watershed Management Program Submittal Pursuant to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Comments and Necessary Revisions to Draft WMP

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Water Quality Characterization Part VI.C.5.a.i	The City's submittal does not include a thorough evaluation of existing water quality conditions, including characterization of storm water and non-storm water discharges from the MS4 and receiving water quality, to support identification and prioritization/sequencing of management actions. The City should evaluate relevant monitoring data for its water quality characterization (e.g. Los Angeles County Sanitation Districts' receiving water monitoring data or mass emissions station and tributary monitoring conducted under the 2001 LA County MS4 Permit may be applicable). The City may be able to find examples of data sources applicable for its water quality characterization in the draft WMPs and EWMP workplans of nearby areas. Conducting representative sampling at the City's MS4 outfalls is another option to support a preliminary water quality characterization of storm water and non-storm water discharges from the City's MS4 if there is a lack of existing water quality data.

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Category 2 Pollutants – Bacteria Part VI.C.5.a.ii.(2)	The City's submittal correctly identifies coliform and indicator bacteria as 303(d) impairments and correspondingly categorizes coliform bacteria as a category 2 pollutant. However, the City incorrectly uses fecal coliform water quality objectives that no longer apply. The City needs to modify its WMP to be consistent with current freshwater bacteria objectives contained in the *Water Quality Control Plan for the Los Angeles Region* in which *E. coli* is used instead of fecal coliform. These objectives were amended in 2010 through Regional Water Board Resolution No. R10-005. The bacteria limitations listed in Table 2-5 (on page 9) should be revised to include the correct bacteria objectives expressed as *E. coli* density. Additionally, all subsequent sections of the WMP that address this pollutant (e.g. compliance schedules, reasonable assurance analysis, etc.) should address *E. coli* instead of fecal or total coliform.
Category 2 Pollutants – Benthic Macroinvertebrate Bioassessments Part VI.C.5.a.ii.(2)	The City's submittal incorrectly lists "benthic microinvertebrates." This should be listed as "benthic macroinvertebrates."
Category 3 Pollutants Part VI.C.5.a.ii.(3)	The City's submittal does not contain any discussion of Category 3 pollutants nor does it indicate that there was any type of review of existing water quality conditions to identify Category 3 pollutants. As the City completes its water quality characterization, the City must identify if there are any Category 3 pollutants and explicitly report its findings in its WMP and address these pollutants as appropriate in the revised draft WMP, including the City's Reasonable Assurance Analysis (RAA).

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Source Assessment and Prioritization Part VI.C.5.a.iii-iv	The City's source assessment section does not directly cite the bases for the identification of known and suspected sources of pollutants. For clarity, the City should at least cite the sources for its findings (e.g. TMDL source investigations, findings from 2001 MS4 MCM programs, etc.). Additionally, the City does not appear to prioritize the issues within the watershed based on the findings of its source assessment. The City may simply maintain the priorities from its water body-pollutant classification; however, the WMP should at least discuss and finalize a prioritization of watershed issues based on its source assessment findings.
Minimum Control Measures Part VI.C.5.b.iv.(1)	The City's submittal includes a section on MCMs (pages 12-37) that mostly incorporates and restates Parts VI.D.5 to VI.D.10 of the permit. However, it is not clear if the City did any assessment of the MCMs to identify if there are opportunities for focusing resources on high priority issues in the watershed. Furthermore, it's not clear if the City has made any modifications to MCMs. The City should discuss its evaluation of control measures and explicitly state if there are any modifications as it describes each program.
Public Agency Activities Program Part VI.C.5.b.iv.(1)(a)(iv)	In discussing its Public Agency Activities Program, the City doesn't state whether its public facility inventory will be updated at least once during the 5-year term of the Order per Part VI.D.9.c.iii. With respect to Landscape, Park, and Recreational Facilities Management, the City doesn't specifically state whether its landscaping maintenance program ensures no application of pesticides or fertilizers prior to rain events specified in Part VI.D.9.g.iii.(2). Since the draft WMP does not explicitly state whether any changes are going to be made to MCMs, it is unclear if these are just unintended omissions.

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Watershed Control Measures – Information on Structural Controls and BMPs Part VI.C.5.b.iv.(4)(b)	The City's submittal does not include sufficient information on the number, type, and location(s) and/or frequency for each structural control and non-structural best management practice. For example, the City does not include the locations of its four proposed Regional BMPs (on page 45), nor is there a thorough description of the type of BMP that will be installed. The City also references "a plan for the implementation of local BMPs," and states that biofilters are the type of local BMP that would be used, but provides no detail on the anticipated number and location(s) of these local BMPs. Regional Water Board staff recommends that the City include a separate section of the WMP to describe all control measures, and corresponding implementation schedules, in detail so that the City's plan and BMP implementation commitments are clear and explicit.

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Watershed Control Measures – Information on Pollution Prevention Measures Part VI.C.5.b.iv.(4)(c)	The City's submittal does not include sufficient information on the nature, scope, and timing of implementation for pollution prevention measures. For example, on page 45 the City describes that "[s]ource control BMPs proposed by the City include policies, programs, and ordinances that support practices that improve or prevent additional pollution from being deposited into the local rivers and creeks." However, there is no further information on this. While the City states that it will implement "enhanced street sweeping, enhanced catch basin and storm drain cleaning, enhanced commercial and food outlet inspection, enhanced pet waste controls, enhanced education and outreach, septic inspection/enforcement, and enhanced Illicit Discharge Detection Elimination (IDDE) efforts (including microbial source tracking to identify inputs of human fecal contamination into the MS4)," the draft WMP does not include specific, measurable commitments for each of these non-structural BMPs. For example, the revised draft WMP must indicate the nature of the enhancements to street sweeping (e.g., increased frequency from two times per month to four times per month, use of regenerative-air sweepers instead of mechanical [broom & conveyor belt] sweepers) and the schedule for implementing the enhancements. See comment below for more detail. As previously stated, Regional Water Board staff recommends that the City include a separate section of the WMP to describe all control measures in detail so that the City's plan and commitments with regard to pollution prevention measures are clear and explicit.

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Watershed Control Measures – Milestones Part VI.C.5.b.iv.(4)(d)	The City's submittal does not include sufficient interim milestones and dates for achievement for each structural control and non-structural best management practice to ensure that TMDL compliance deadlines will be met. The City's proposed BMP Implementation Plan (on page 45) should list interim milestones for the structural controls and non-structural BMPs that it plans to implement. Example milestones may include milestones for planning and design, beginning construction, and completing construction. The only interim milestone that is included is for "non-modeled, non-structural BMPs" with a date of December 2017 for their implementation. Greater specificity regarding the City's commitments for each non-modeled, non-structural BMP is necessary, as described above. Regional Water Board staff recommends that this information be included in full detail in a separate section of WMP outside of the Reasonable Assurance Analysis section.
Reasonable Assurance Analysis – Category 1 Pollutants Part VI.C.5.b.iv.(5)	The RAA does not consider dry weather conditions. However, the draft WMP only justifies this omission by stating that the City plans to eliminate 100% of non-exempt dry weather MS4 discharges. If this is the City's goal, the WMP needs to include a detailed plan of what control measures it plans to implement to ensure the elimination of non-exempt non-stormwater discharges. This plan should also include interim milestones. Additionally, the City must also justify in its WMP that these control measures will ensure compliance with the applicable compliance deadlines for selenium. Part of this justification should include an evaluation of whether any of the conditionally exempt, non-stormwater discharges may be a source of selenium that could cause or contribute to an exceedance of the selenium WQBEL. If the City cannot provide a feasible and measureable plan that ensures compliance, then it will need to demonstrate through its RAA that it will comply with the applicable compliance deadlines for selenium.

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Reasonable Assurance Analysis – Category 2 Pollutants Part VI.C.5.b.iv.(5)	The RAA does not address Category 2 pollutants aside from bacteria. As noted in a previous comment, bacteria should be modeled using *E. coli* instead of fecal coliform. For other Category 2 pollutants (ammonia, cyanide, pH, and TDS) the City must provide additional information to demonstrate that MS4 discharges will meet receiving water limitations.
Compliance Schedules for Category 1 Pollutants Part VI.C.5.c.iii.(1)-(2)	The draft WMP does not incorporate the interim and final implementation deadlines contained in the *Implementation Plan for Metals and Selenium in San Gabriel River and Impaired Tributaries*. The Basin Plan amendment (Regional Water Board Resolution No. R13-004) that incorporated this program of implementation into the Basin Plan was recently approved by the Office of Administrative Law. This plan includes an implementation schedule with interim compliance deadlines of September 30, 2017; September 30, 2020; and September 30, 2023; and a final compliance deadline of September 30, 2026. The City's submittal does not include any compliance deadlines occurring within the permit term for Category 1 pollutants (i.e. lead and selenium). While the City's analysis indicates that no load reductions are required to meet the lead WLA (p. 50), the September 30, 2017 compliance deadline should be included along with the corresponding structural and non-structural BMPs that will be implemented to achieve the dry weather WLA for selenium in 30% of the City's drainage area (or achieve a 30% reduction in the difference between the current loadings and the dry weather WLAs for selenium). Table 4-9 (on pages 50-51) only establishes a final compliance date of 2024.

Issue and MS4 Permit Provision	Regional Water Board Staff Comment
Compliance Schedules for Category 2 Pollutants Part VI.C.5.c.iii.(3)	The City's submittal does not include interim milestones and dates for achieving milestones for Category 2 (High Priority) pollutants—i.e. coliform bacteria, ammonia, pH, TDS, toxicity, cyanide, and benthic macroinvertebrate condition. As it does with Category 1 pollutants, Table 4-9 (on pages 50-51) only establishes a final compliance date of 2024 for bacteria load reductions. Per the LA County MS4 Permit, interim milestones and dates for their achievement must be adequate for measuring progress once every two years. Additionally, the City does not discuss or justify its reasoning for adopting a 10-year compliance schedule for bacteria.

TO: Melissa Barcelo
City of Walnut

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
REGIONAL PROGRAMS SECTION

DATE: October 21, 2014

SUBJECT: COMMENTS ON REASONABLE ASSURANCE ANALYSIS REPORT FOR CITY OF WALNUT

This memorandum contains comments on Section 4.0 "Reasonable Assurance Analysis" of the City's draft Watershed Management Program, dated June 28, 2014, which was submitted by the City of Walnut.

A. General comments on the draft Reasonable Assurance Analysis section of the draft Watershed Management Program.

1. Pursuant to Part VI.C.5.a.iv(1) and VI.C.5.b.iv.(3)-(4), pages 60 and 62-63 of the LA County MS4 Permit, the City is subject to final wasteload allocations (WLAs) pursuant to Attachment P, Part A "San Gabriel River and Impaired Tributaries Metals and Selenium TMDL." The LA County MS4 Permit specifies a WLA for lead during wet weather that applies to Reach 2 of the San Gabriel River and all upstream reaches and tributaries and for selenium during dry weather that applies to San Jose Creek 1 and 2, which are both applicable to the City's MS4 discharges.

   The City's approach to estimate baseline loading for lead was not appropriate pursuant to Section B of the Reasonable Assurance Analysis Guidelines (see comment B.1 below for more detail).

   For selenium, the City does not support its assumption that the source of selenium is natural with any available data or peer-reviewed scientific studies.

   The City did not analyze a strategy to implement pollutant controls necessary to achieve applicable interim and final water quality-based effluent limitations for selenium consistent with the interim and final implementation deadlines in the Basin Plan Amendment, Resolution No. R13-004 - Implementation Plan for the TMDLs for Metals and Selenium in the San Gabriel River and Impaired Tributaries. These include:

   - By September 30, 2017, for WQBELs applicable in wet weather a 10% reduction, and dry weather a 30% reduction in the difference between current pollutant loads and the WQBEL.
   - By September 30, 2020, for WQBELs applicable in wet weather a 35% reduction, and in dry weather a 70% reduction in the difference between current pollutant loads and the WQBEL.

2. Target load reductions for bacteria in San Jose Creek were based on an incorrect water quality objective of 4000 MPN/100 mL. The correct water quality objective is an *E. coli* density of 235 per 100 mL as a single sample maximum, and an *E. coli* density of 126 per 100 mL as a geometric mean. (San Jose Creek has a Potential REC-1 beneficial use designation.) Similarly, target load reductions for Walnut Creek must be based on the current water quality objectives for *E. coli* contained in the Basin Plan.

3. The City's submittal does not provide adequate support or justification from peer-reviewed sources for the fecal coliform load reduction from 22 to 44 10^12 MPN (for 25th and 75th percentile) for San Jose Creek to be achieved by non-modeled non-structural BMPs. In order to take credit for the 8% reduction from baseline loading of bacteria as a result of implementation of non-modeled non-structural BMPs, greater specificity must be provided on the enhanced watershed control measures. The City must provide details regarding how, when and to what extent these measures will be enhanced during this permit term. Additionally, the City must provide measurable milestones for implementing each one of the control measures that will allow an assessment of progress toward the final receiving water limitations every two years.

B. Modeling comments regarding analysis of total lead and bacteria for San Jose Creek and Walnut Creek Wash in San Gabriel River watershed:

1. The model predicted mass contributions of total lead and bacteria from the City shown in Table 4-2 are not consistent with those values directly from the model output. For example, the 90th percentiles of mass loads of lead presented in Figure A of this attachment are 32 lbs/day and 0.37 lbs/day respectively in San Jose Creek and in Walnut Creek Wash. In terms of 90th percentile model year, the total lead loads would be 2464 lbs/year and 28 lbs/year respectively, which are not consistent with the values presented in Table 4-2 of RAA Report. In addition, the predicted results of lead concentration in San Jose Creek obtained directly from the model output file as shown in Figure B. of this attachment are much higher than the EMC values and WQBEL value for lead. As such, the City should re-analyze baseline loading under the critical condition consistent with the expression of the WLA for lead (i.e., daily load) before concluding that the allowable lead load can be set equal to the baseline load (see p. 41). Additionally, the conclusion that no reduction for lead is required should be re-evaluated based on a daily load. Similarly, the model results presented in Table 4-2 and Table 4-3 should be presented in kg/day to be consistent with the expression of the WLA in Attachment P of the LA County MS4 Permit.

   Pursuant to Section B.II.c of the RAA guideline, pollutant event mean concentrations (EMCs) should only be used when water quality data are not available. As soon as sufficient data are collected, the model should be refined/calibrated using updated data to estimate the baseline pollutant loading.

2. The expected reductions in pollutant load from baseline to be achieved by the proposed BMPs identified in Table 4-6 and Table 4-7 for bacteria need the detailed model results to support each BMP performance as shown in Table 4-6 and Table 4-7. For example, the RAA should include the time series of load reduction for bacteria over the simulation

period to demonstrate the variability of load reduction from the baseline condition for each BMP.

The report did not describe how the model was calibrated, including calibration results compared to calibration criteria in Table 3.0 of the RAA Guidelines, and no historical hydrology and water quality monitoring data were used for comparison with the model results for the baseline prediction. According to Part G, pages 12-13 of the RAA Guidelines, model calibration is necessary to ensure that the model can properly assess all the variables and conditions in a watershed system.

3. The report did not evaluate the critical condition for the modeling. For example, the input rainfall should be presented in the report and explain what the modeling periods are that are being simulated for the critical condition. Pursuant to Part B on pages 2-4 of the RAA Guidelines, a description of the process for identifying critical conditions is needed prior to the RAA modeling analysis. A summary of TMDL critical conditions relevant to MS4 discharges was provided in Appendix B of the RAA Guidelines for Permittees' reference. The report presents mass contributions of total lead and bacteria, but does not present concentration of those pollutants under the critical condition.

4. The ID for each of the 18 subwatersheds used in the model simulation must be provided and be shown in the simulation domain to present the geographic relationship of subwatersheds simulated in the LSPC model.

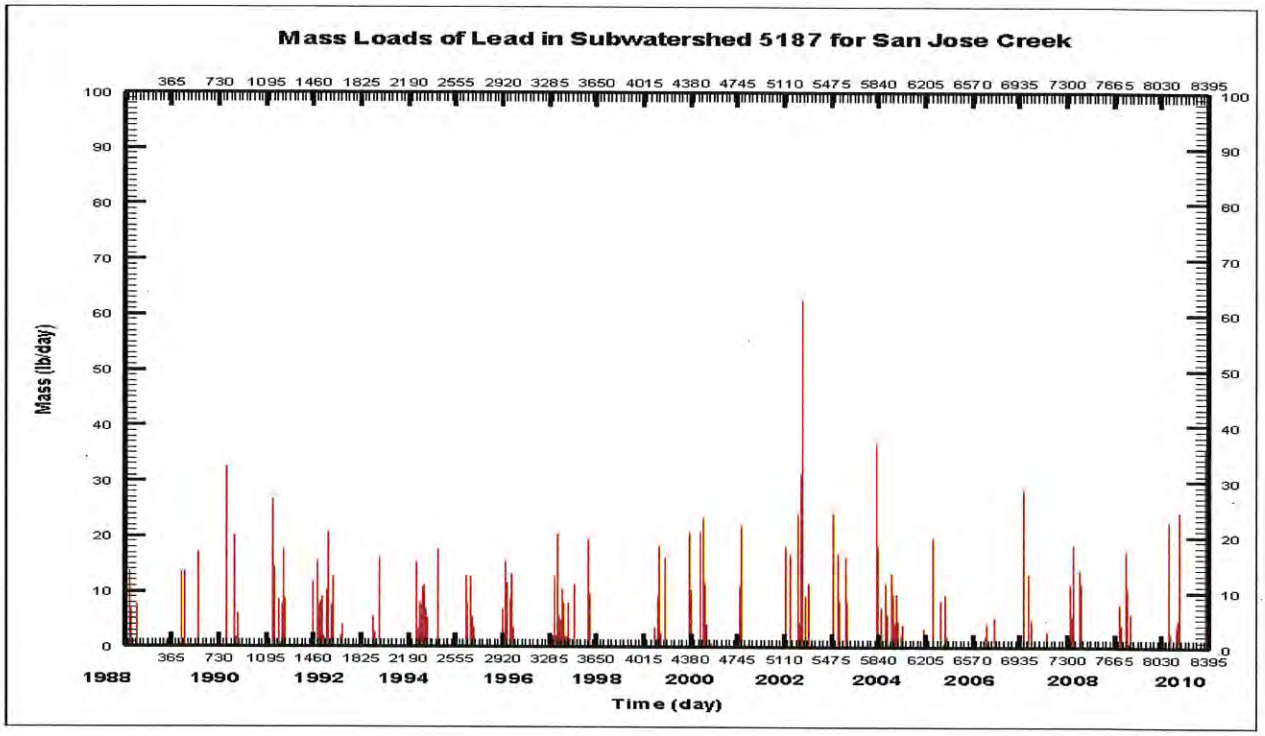
5. The flow and water quality time series output at the watershed outlet must be provided using the 90^{th} percentile of modeled pollutant concentration and mass per day for wet event days consistent with the expression of the WLA over simulation periods to estimate the baseline concentration and mass. In addition, per RAA Guidelines, the model output should include storm water runoff volume at outlet for baseline and each BMP scenario as well (See Table 5. Model Output for Both Process Based BMP Models and Empirically Based BMP Models, pages 20-22 of the RAA Guidelines).

6. Model simulation under the dry weather condition for bacteria for San Jose Creek and Walnut Creek Wash was not included in the Report.

7. Per the RAA Guidelines, the required load reduction should be evaluated at the jurisdictional boundary of each subwatershed for each pollutant to demonstrate that the proposed control measures will ensure that the City's MS4 discharges achieve effluent limitations and do not cause or contribute to exceedances of receiving water limitations. The BMP performance model proposed in the RAA Guidelines should be used to predict the pollutant reduction for the proposed BMPs.

C. Modeling comments regarding lack of analysis for other Category 1 waterbody pollutant combination:

1. Model simulations, baseline loadings, and required reductions for selenium were not included in the Report.



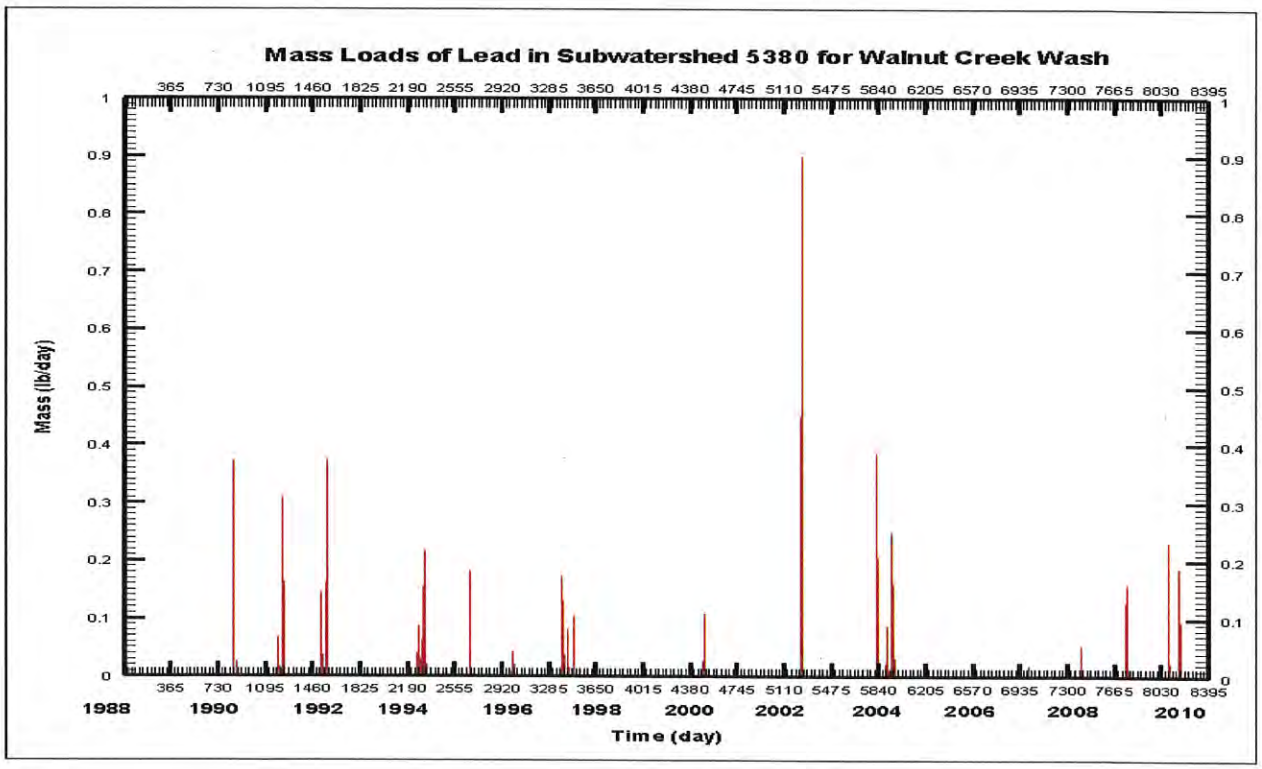


Figure A. Model predicted results for total loads of lead directly from the model output file

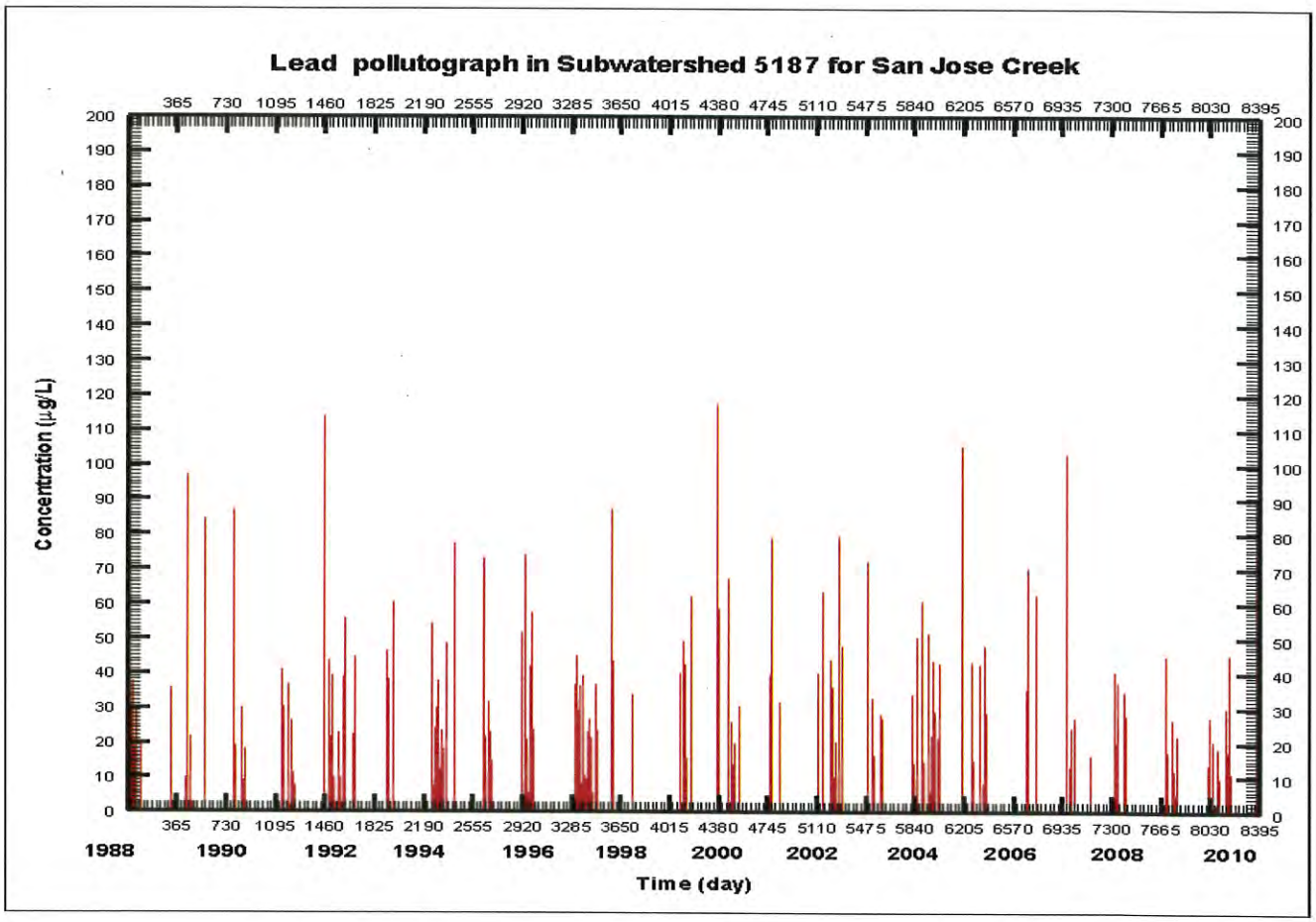


Figure B. Model predicted results of lead concentration in San Jose Creek directly from model output file

October 22, 2014

Mr. Frank Senteno, City Engineer
City of El Monte
Department of Public Works
11333 Valley Blvd.
El Monte, CA 91731

REVIEW OF THE CITY OF EL MONTE'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Mr. Senteno:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 26, 2014 by the City of El Monte. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County Permit and must be approved by the Regional Water Board.

As stated above, on June 26, 2014, the City of El Monte submitted a draft Watershed Management Program (WMP) for their entire jurisdiction to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County

MS4 Permit. However, some revisions to the City's draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2, respectively. The specific Permit provisions cited in the enclosures refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which necessary revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Board comments identified in the enclosures, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 22, 2015.**

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft El Monte WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov.

If the necessary revisions are not made, the City of El Monte will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachments O and P pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft WMP is approved, the City of El Monte is required to:

(a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
(b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii); and
(c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters.

In addition on June 26, 2014, the City of El Monte submitted a draft Coordinated Integrated Monitoring Program (CIMP) to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures:
Attachment 1 Comments and Necessary Revisions to Draft WMP
Attachment 2 Comments on Reasonable Assurance Analysis for the City of El Monte

cc: Jesus Gomez, Assistant City Manager
Edmond Suher, Senior Project Engineer, CASC Engineering and Consulting

Attachment to October 22, 2014 Letter Regarding the City of El Monte's Draft Watershed Management Program (WMP) Submittal Pursuant to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Comments and Necessary Revisions to Draft WMP

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
Part VI.C.5.a.i. Water Quality Characterization (p. 58)	• The Regional Board staff acknowledges the City's initiative in conducting outfall monitoring to characterize their storm water and non-storm water discharges at two outfalls, one in the Rio Hondo subwatershed and one in the San Gabriel River watershed. The City states that, "the drainage(s) to the selected outfall(s) are representative of the land uses within the City's jurisdiction. The City's land use is: o 7% office o 10% industrial/commercial o 11% retail o 58% residential o 14% other amenities" Corresponding land use for the drainage areas associated with Outfalls 5 and 7 should be presented for comparison. • At a minimum, the last five years of Mass Emissions data for S10 (LA River) and S14 (SG River) should be considered. Additionally, applicable tributary monitoring data (such as for Rio Hondo @ TS06 conducted from 2002-04) should be considered as well as data collected during TMDL development for Legg Lake (and Peck Road Park Lake, if applicable).
Part VI.C.5.a.ii. Waterbody-Pollutant Classification (page 59)	<u>Category 1 Waterbody-Pollutant Combinations</u>: • The City's draft WMP lists Category 1 pollutants but did not include cadmium, for which there is a WQBEL applicable to storm water per the LA River Metals TMDL. • Cadmium is omitted from the RAA, as are dry weather WQBELs for Cu, Pb, and Zn in the LA River, as well as interim bacteria WQBELs. All WQBELs should be included in the RAA or should be accounted for using a surrogate pollutant. <u>Category 2 Waterbody-Pollutant Combinations</u>: • The draft WMP should be revised to identify the applicable Receiving Water Limitations for Category 2 pollutants that are required to be addressed by the draft WMP. • Indicator Bacteria for San Gabriel River Reach 3 should be included as a Category 2 pollutant in accordance with the 2010 303(d) list. • Toxicity and pH for Rio Hondo should be included as Category 2 Pollutants in accordance with the 2010 303(d) list. • The draft WMP does not include Cyanide as a Category 2 pollutant though the WMP acknowledges water quality has been identified as having been impaired by Cyanide. The WMP needs to include Cyanide or explain why it was not included. • Lead, Odor, and Organic Enrichment/Low Dissolved Oxygen should be included as Category 2 pollutants for Peck Road Park Lake in accordance with the 2010 303(d) list, unless documentation confirming that there are no discharges from the City's

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
	MS4 to Peck Road Park Lake is included in the revised WMP. • Trash for Legg Lake and Peck Road Park Lake don't need to be included as Category 2 pollutants as they are already included as Category 1 pollutants. <u>Category 3 Waterbody-Pollutant Combinations</u>: • The City's submittal does not summarize the findings from the review of Annual Reports, IC/ID reports, SWAMP, Industrial/Commercial Facility baseline exceedances information from SMARTS, which are data sources listed in Section 1.7.3 as being used by the City to identify waterbody-pollutant combinations with exceedances of water quality objectives. The WMP should be revised to include the findings from the review of these data sources. • The draft WMP should be revised to identify the applicable Receiving Water Limitations for Category 3 pollutants that are required to be addressed by the draft WMP. • The WMP should also potentially include diazinon and arsenic as Category 3 pollutants for Rio Hondo based on the tributary monitoring data from TS06. • Copper and Zinc for the Los Angeles River do not need to be included as Category 3 pollutants since they are already in Category 1. • Lead in the San Gabriel River does not need to be included as a Category 3 pollutant as it is already included as a Category 1 pollutant.
Part VI.C.5.a.iii. Source Assessment (page 59-60)	• The City's draft WMP lists a variety of data sources used in developing the source assessment but does not present the findings from these data sources. The WMP should be revised to present the findings from the review of the data sources identified in Section 1.6. • The draft WMP did not include data and conclusions from TMDL source investigations regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters. The data and conclusions from TMDL source investigations regarding known and suspected stormwater and non-stormwater pollutant sources should be included in the draft WMP's source assessment.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64)	• Section 1.8 of the draft WMP lists a general strategy to implement pollutant controls but few details are included and watershed control measures are not presented for the City's MS4 discharges to the San Gabriel River. Regional Board staff acknowledges that to a large degree the selection of watershed controls is based on the City's RAA, which indicates no pollutant reduction is required for the following pollutants: o Nitrogen-Peck Rd Park Lake o Lead-San Gabriel River o Copper, Zinc, and Lead-LA River o Nitrogen Compounds-LA River However, some waterbody-pollutant combinations were omitted from the RAA, including cadmium in the LA River, non-stormwater discharges of copper, lead and zinc to the LA River, bacteria in the LA River and San Gabriel River, etc. Detailed comments on the City's RAA are provided in a separate memorandum. • The draft WMP needs to include greater specificity in detailing how non-stormwater discharges will be identified and what measures will be taken to eliminate them, particularly in order to achieve applicable WQBELs for bacteria, copper, lead and zinc for non-stormwater discharges to the LA River per applicable interim and final compliance deadlines in the LA County MS4 Permit. • The draft WMP needs to include greater specificity on watershed control measures including how the pollutants identified in Categories 1, 2 and 3 are each addressed by the proposed control measures. • The draft WMP needs to include documentation demonstrating that the City's MS4 does not discharge to Peck Road Park Lake. • The draft WMP references trash control BMPs (full capture inserts) but does not reference any other control measures identified in TMDLs and corresponding TMDL implementation plans, specifically the Los Angeles River & Tributaries Total Maximum Daily Loads for Metals Final Implementation Plan for Reach 2 Participating Jurisdictions. • The draft WMP needs to ensure controls identified in TMDLs and TMDL Implementation plans are incorporated in the WMP. • Figure 1-7 in the draft WMP is fairly detailed; listing the location and type of structural controls proposed for implementation but the narrative language in the WMP is fairly general and does not match up with Figure 1-7. The WMP should be revised to include specific narrative language that is consistent with Figure 1-7. • Interim milestones for BMP implementation were only included for trash for the LA River and trash and nutrients for Legg Lake (Section 1.10). The WMP needs to be revised to include interim milestones for the implementation of each structural control and non-structural best management practice identified in Sections 1.8.3 and 1.8.4 and on Figure 1.7 to comply with interim and final compliance deadlines for the LA River metals and bacteria TMDLs as well as interim milestones for addressing pollutants in Categories 2 and 3. • The draft WMP needs to include documentation that the City has the necessary legal authority to implement the Watershed Control Measures identified in the WMP, or that other legal authority exists to compel implementation of the Watershed Control Measures. • The WMP does not specify a strategy for pollutants in Categories 2 and 3. Section 1.8 lists a general strategy that concludes with the statement, "The City will implement Watershed Control Measures based on the results of its watershed modeling and the necessary pollutant reductions." The WMP needs to be revised to specify a strategy for pollutants in Categories 2 and 3.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64) continued	• As stated above, the RAA did not include all pollutants identified in Categories 1, 2 and 3, as required. The RAA needs to include these other pollutants and the City needs to propose appropriate BMPs in the WMP where the RAA indicates that load reductions for these pollutants are required.
Reasonable Assurance Analysis – Category 1 Pollutants Part VI.C.5.b.iv.(5)	Not all Category 1 pollutants were included in the RAA. All Category 1 pollutants or surrogates need to be included in the RAA.
Reasonable Assurance Analysis – Categories 2 and 3 Pollutants Part VI.C.5.b.iv.(5)	The WMP did not model any pollutants in Categories 2 and 3. These pollutants or surrogates need to be included in the RAA.

TO: Mr. Frank Senteno, City Engineer
City of El Monte

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 22, 2014

SUBJECT: COMMENTS ON DRAFT WATERSHED MANAGEMENT PROGRAM, SECTION 1.9, REASONABLE ASSURANCE ANALYSIS

This memorandum contains comments on Section 1.9 of the City of El Monte's Draft Watershed Management Program, "Reasonable Assurance Analysis" (RAA), dated June 2014, which was submitted by the City of El Monte.

A. General comments on the draft Reasonable Assurance Analysis section of the Watershed Management Program.

1. Pursuant to Part VI.C.5.a.iv(1) and VI.C.5.b.iv.(3)-(4), pages 60 and 62-63 of the MS4 Permit, the City is subject to final water quality-based effluent limitations pursuant to (i) Attachment O, Part A "Los Angeles River Watershed Trash TMDL", Part B "Los Angeles River Nitrogen Compounds and Related Effects TMDL", Part C "Los Angeles River and Tributaries Metals TMDL", Part D "Los Angeles River Watershed Bacteria TMDL", Part E "Legg Lake Trash TMDL", Part G.7 "Legg lake System Nutrient TMDL, Part G.8 to 13 "Peck Road Park Lake Nutrient, PCBs, Chlordane, DDT, Dieldrin, and and Trash TMDLs", and (ii) Attachment P, Part A "San Gabriel River and Impaired Tributaries Metals and Selenium TMDL." As identified below, some pollutants with applicable water quality-based effluent limitations (WQBELs) appear to have been omitted from the RAA, including bacteria in the Los Angeles River and non-stormwater discharges of copper, lead and zinc to the Los Angeles River.

2. The City has provided an evaluation of the existing water quality conditions for receiving water to which the City's MS4 discharges, including the Los Angeles River and San Gabriel River. However, lead for San Gabriel River and cadmium and nitrogen compounds for Los Angeles River were not summarized and included the receiving water characterization section (Section 1.2 of the draft Watershed Management Program). A summary of water quality conditions for these pollutants should be added to the revised WMP.

3. The City has estimated nutrient baseline loading and the required reduction for Peck Road Park Lake. However, the City did not include any pollutant reduction plan to reduce nutrient loading to the lake based on the review of the City and LACFCD that

there is no direct or indirect discharge from the City to the Lake (Section 1.8.3 *TMDL Control Measures* of the draft WMP). The City must submit the record and evidence to support the City's conclusion that there are no MS4 discharges from the City to Peck Road Park Lake.

4. Model simulation for pollutants in Categories 2 and 3 was not included in the RAA.

B. Modeling comments regarding analysis of dissolved copper, dissolved lead, dissolved zinc, and nitrogen loads for Los Angeles River; nitrogen and phosphorous loads for Legg Lake and Peck Road Park Lake; and dissolved lead loads for San Gabriel River:

1. The model predicted mass contributions of pollutants from the City shown in Table 1-6 through Table 1-14 and Figure 1-8 through Figure 1-11 are not consistent with those values directly from the model output (see attached Figure A. and Figure B. for an example) . As such, the conclusion that no pollutant reduction is required should be re-evaluated.

2. The RAA did not include the model results for cadmium, nitrogen compounds and bacteria for Los Angeles River. There are too many uncertainties involved in converting modeled TSS concentrations to predicted concentrations of nitrate + nitrite as nitrogen, as presented in Table 1-9. The RAA should present instead the directly modeled concentrations of nitrate + nitrite as nitrogen. Additionally, the RAA should include model output for cadmium loading as is done for copper, lead and zinc loading to the Los Angeles River or alternatively, include the rationale on how cadmium loading will be addressed by addressing the other metals.

3. Section 1.9 of the draft WMP did not describe how the model was calibrated, including calibration results compared to calibration criteria in Table 3.0 of the RAA Guidelines, and no historical hydrology and water quality monitoring data were used for comparison with the model results for the baseline prediction. According to Part G, pages 12-13 of the RAA Guidelines, model calibration is necessary to ensure that the model can properly assess all the variables and conditions in a watershed system.

4. The 90th percentile wet year was selected. However, the report did not present the precipitation data and frequency analysis used to select the critical condition for the modeling. The input rainfall should be presented in the report and explain what the modeling periods are that are being simulated for the critical condition. Pursuant to Part B on pages 2-4 of the RAA Guidelines, a presentation of the process and data used for identifying critical conditions is needed prior to the modeling analysis. A summary of TMDL critical conditions relevant to MS4 discharges was provided in Appendix B of the RAA Guidelines for Permittees' reference.

5. The report presents mass contributions of copper, lead and zinc, but does not present the runoff volumes and concentrations of those pollutants under the critical condition.

6. The ID number for each of the 313 subwatersheds from the model input file must be provided and be shown in the simulation domain to present the geographic relationship of these subwatersheds within the surrounding watershed area and within the City's boundaries, which are simulated in the LSPC model.

7. Where pollutant reductions are necessary, the model output should include the storm water runoff volume, flow, water quality concentration and pollutant loads in time series at the jurisdictional boundary of each subwatershed for each BMP scenario as well (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-22 of the RAA Guidelines).

8. Per the RAA Guidelines, the required load reduction should be evaluated at the jurisdictional boundary of each subwatershed to demonstrate that the proposed control measures will ensure that the City's MS4 discharges achieve effluent limitations and do not cause or contribute to exceedances of receiving water limitations. The BMP performance model proposed in the RAA Guidelines should be used to predict the pollutant reduction for the proposed BMPs.

9. Model simulation under the dry weather condition for dissolved copper, lead and zinc for Los Angeles River and for bacteria in the Los Angeles River was not included in the RAA.

Figure 1-8: Scatter Plot for LA River Copper

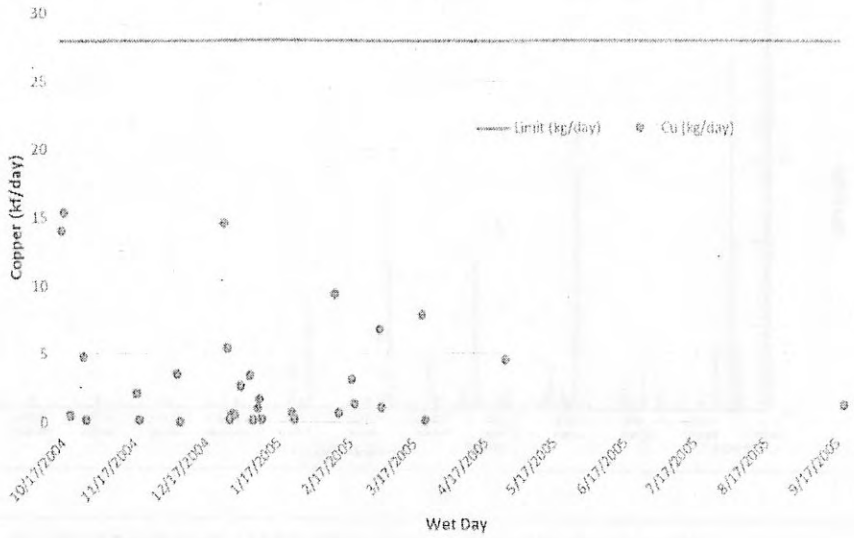


Figure 1-9: Scatter Plot for LA River Lead

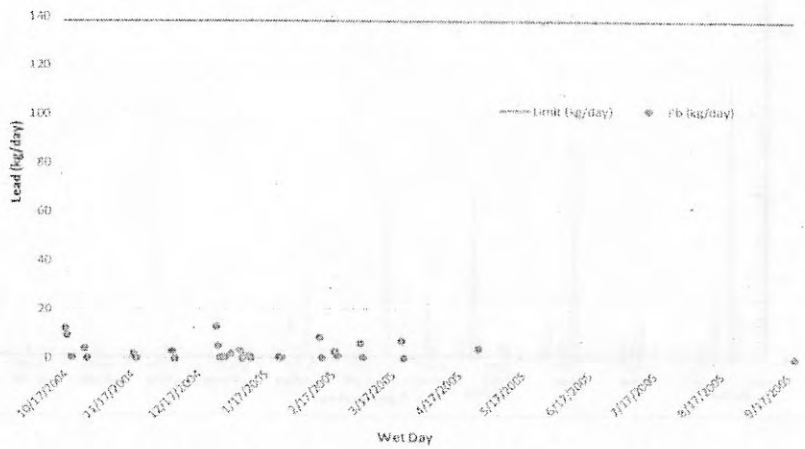


Figure 1-10: Scatter Plot for LA River Zinc

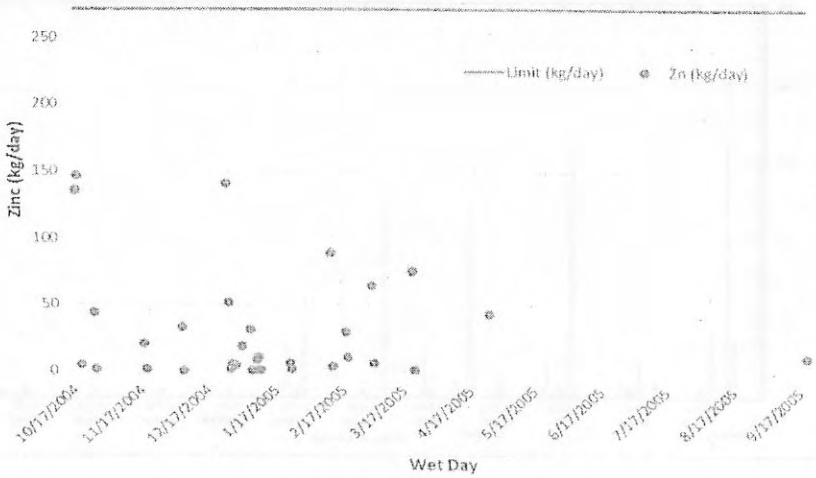
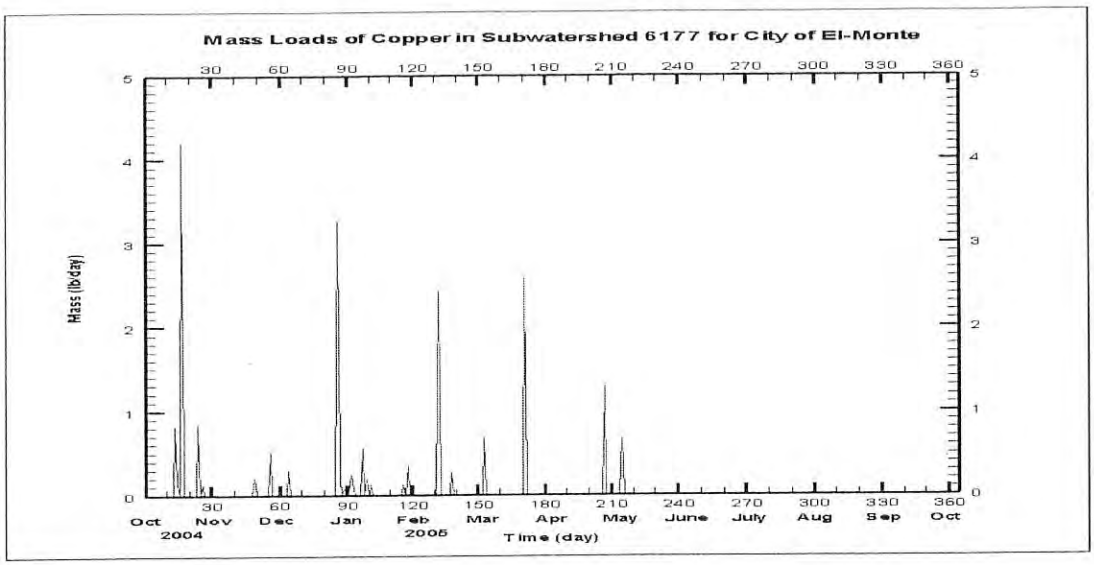
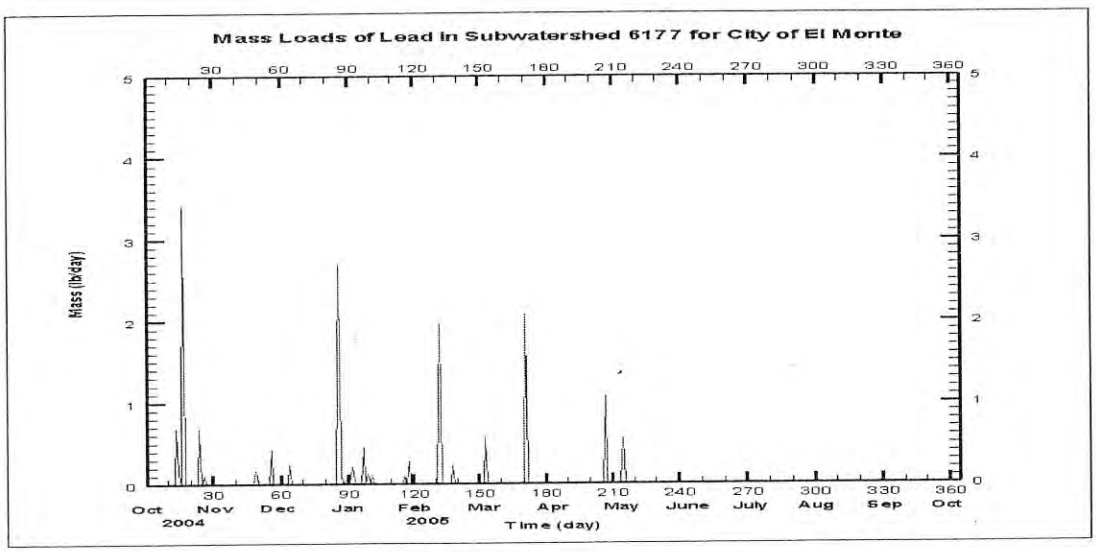


Figure A. Model predicted results from RAA Report for City of El Monte





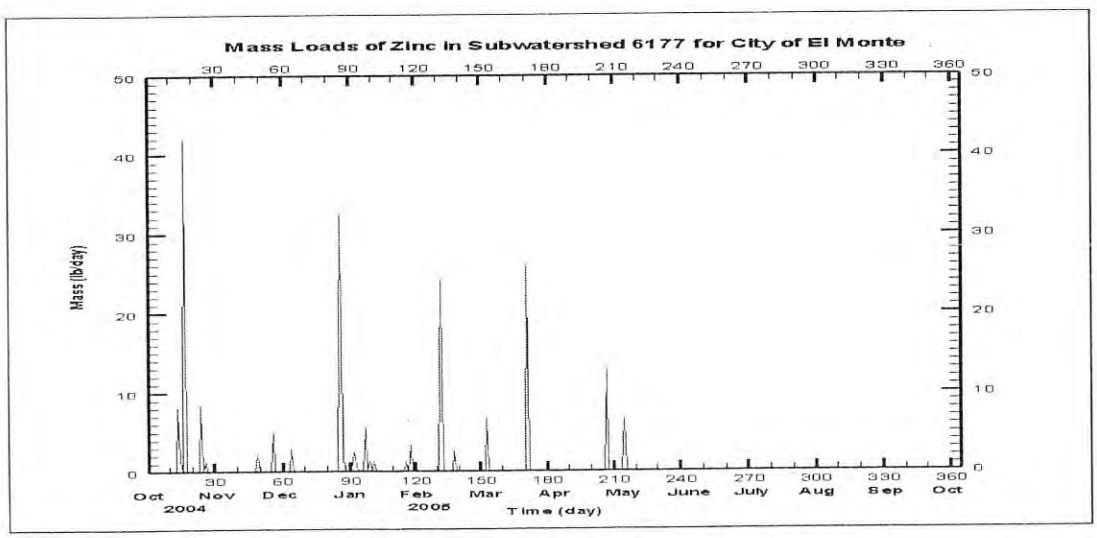


Figure B. Model predicted results directly from the output file for City of El Monte

Exhibit B

April 28, 2015

Permittees of the East San Gabriel Valley Watershed Management Group[1]

APPROVAL, WITH CONDITIONS, OF THE EAST SAN GABRIEL VALLEY GROUP'S WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees of the East San Gabriel Valley Watershed Management Group:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). Part VI.C of the LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land Development Program. Pursuant to Part VI.C.4.c of the LA County MS4 Permit, the Permittees of the East San Gabriel Valley Watershed Management Group (ESGV WMG) jointly submitted a draft WMP dated June 27, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the ESGV WMG's draft WMP. A separate notice of availability regarding the draft WMPs, including the ESGV WMP, was directed to State Senators and Assembly Members

[1] Permittees of the East San Gabriel Valley Watershed Management Group include the cities of Claremont, La Verne, Pomona, and San Dimas. See attached distribution list.

within the Coastal Watersheds of Los Angeles County. The Board received two comment letters that had comments on WMPs generally, which were in part applicable to the ESGV WMG draft WMP. One joint letter was from Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper, and the other letter was from the Construction Industry Coalition on Water Quality (CICWQ). On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the ESGV WMG's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 27, 2014, the Los Angeles Water Board sent a letter to the ESGV WMG detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the ESGV WMG's WMP. The letter directed the ESGV WMG to submit a revised draft WMP addressing the Los Angeles Water Board's comments. Prior to the ESGV WMG's submittal of the revised draft WMP, Board staff had a meeting on January 13, 2015 with ESGV WMG representatives and consultants, and several follow-up teleconferences and e-mail exchanges, to discuss the Board's comments and the revisions to the draft WMP, including the supporting reasonable assurance analysis (RAA), which would address the Board's comments. The ESGV WMG submitted its revised draft WMP on January 28, 2015 for Los Angeles Water Board review and approval.

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the ESGV WMG's January 28, 2015, revised draft WMP. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Correct Tables 3-3 and 5-5 of the revised draft WMP by removing reference to the dry-weather copper waste load allocations (WLAs). The East San Gabriel Valley Permittees' MS4 discharges are not subject to the dry-weather copper WLAs in the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL (Attachment P of the LA County MS4 Permit) assigned to discharges to the San Gabriel River Reach 1 and San Gabriel River Estuary.[2]

[2] According to the TMDL, dry-weather WLAs for copper are assigned to San Gabriel River Reach 1 and Coyote Creek and its tributaries to meet the copper TMDL in the Estuary. No dry-weather copper WLAs are required for San Gabriel River Reaches 2, 3, 4, 5, San Jose Creek, or Walnut Creek because they do not drain to the Estuary during dry weather. Dry-weather WLAs are assigned to San Jose Creek Reach 2 to meet the selenium TMDL in San Jose Creek Reach 1. (USEPA 2007)

2. Revise Table 4-3 of the revised draft WMP to include "Interagency coordination," "Hydromodification Control Plan," and "Sewage system maintenance, overflow, and spill prevention," which are requirements of the LA County MS4 Permit. (See Parts VI.A.2.a.viii, VI.A.4.a.iii, and VI.D.2, among others, regarding "interagency coordination"; Part VI.D.7.c.iv regarding "Hydromodification Control Plan"; and Parts VI.D.9.h.ix and VI.D.10.c-e regarding "sewer system maintenance, overflow, and spill prevention.")
3. Revise and separate Table 4-2 of the revised draft WMP, "Recently Constructed and Planned BMPs in the WMP Area," into two tables to clearly distinguish between: (a) those best management practices (BMPs) that are already constructed (providing the completion date for each), and (b) those BMPs that are planned (providing the scheduled completion date for each).
4. Clarify the responsibilities of each Permittee of the ESGV WMG for implementation of watershed control measures in Table 5-17 of the revised draft WMP, "Control Measures to be Implemented for Attainment of 10% Milestone" and Table 5-18, "Schedule for Implementation of the Rooftop Runoff Reduction Program" to attain the 10% interim milestone in the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL.
5. Correct inconsistencies between Table 5-4 and Table 5-6 of the revised draft WMP, including: (a) information on selenium, which indicates exceedances downstream in Table 5-4 of the revised draft WMP, but indicates that no reductions are necessary in Table 5-6, and (b) missing information on E. coli exceedances in Table 5-4.
6. Revise Appendix D of the revised draft WMP to include: (a) both the geometric mean water quality objective (126/100 mL) and the single sample maximum water quality objective (235/100 mL) for E. coli density and (b) a table of the water quality-based effluent limitations (WQBELs) applicable to the ESGV WMG for lead, selenium, total nitrogen, total phosphorus, total mercury, total PCBs, total chlordane, dieldrin, total DDT, and 4,4-DDT as set forth in Attachment P of the LA County MS4 Permit.
7. Confirm in the revised draft WMP that Permittees of the ESGV WMG shall implement permit provisions in Part III Discharge Prohibitions and Part VI.D Stormwater Management Program Minimum Control Measures as set forth in the LA County MS4 Permit, unless noted otherwise in the revised draft WMP.
8. Provide in an Appendix the comparison of the volume reductions required by the load-based and volume-based numeric goals conducted as the initial step in the WMP Reasonable Assurance Analysis (RAA).

The ESGV WMG shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than June 12, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit, the ESGV WMG shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, Permittees must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless

of any contingencies indicated in the approved WMP (e.g., funding) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii. The Los Angeles Water Board will determine the ESGV Permittees' compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Table 5-16 "Schedule of Control Measures and BMP Capacities to Interim Milestones for the ESGV WMP," which establishes the jurisdictional and subwatershed interim and final milestones for BMP capacities (in acre-feet);
- Table 5-17 "Control Measures to be Implemented for Attainment of 10% Milestone;" and
- Table 5-18 "Schedule for Implementation of the Rooftop Runoff Reduction Program."

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit, the ESGV Permittees' full and timely compliance with all actions and dates for their achievement in their approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachment P of the LA County MS4 Permit. Further, per Part VI.C.2.b of the LA County MS4 Permit, the ESGV Permittees' full compliance with all requirements and dates for their achievement in their approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit for the specific waterbody-pollutant combinations addressed by their approved WMP.

If the Permittees in the ESGV WMG fail to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the ESGV WMG's Annual Reports and program audits (when conducted), the Permittees in the ESGV WMG shall be subject to the baseline requirements of the LA County MS4 Permit, including but not limited to demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c).

Annual Reporting

The ESGV WMG shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit. For multi-year efforts, the ESGV WMG shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention/infiltration projects, including the rooftop runoff reduction program, LID due to new/redevelopment, green streets, and regional BMPs, the ESGV WMG shall report annually on the volume of stormwater retained in each jurisdictional subwatershed area.

The ESGV WMG shall also include in its Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit. Further, as part of the annual certification concerning a permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit, each Permittee in the ESGV WMG shall also certify in the Annual Report that it has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6). If a Permittee does not have legal authority to implement an action or milestone at the time the ESGV WMG submits its Annual Report, the Permittee shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The ESGV WMG shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit. As part of this process, the ESGV WMG must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment P of the LA County MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

The ESGV WMG's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit, the ESGV WMG shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the ESGV WMP area that are collected through the ESGV WMG's Coordinated Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The Permittees of the ESGV WMG must

implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the Permittees' Report(s) of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the Permittees' ROWD.

The Los Angeles Water Board appreciates the participation and cooperation of the ESGV WMG in the implementation of the LA County MS4 Permit. If you have any questions, please contact Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosure: Distribution List

EAST SAN GABRIEL VALLEY WMG DISTRIBUTION LIST		
Name	City	Email Address
Latoya Cyrus	San Dimas	lcyrus@ci.san-dimas.ca.us
Loretta Mustafa	Claremont	lmustafa@ci.claremont.ca.us
Kathleen Trepa	Claremont	ktrepa@ci.claremont.ca.us
Brian Desatnik	Claremont	bdesatnik@ci.claremont.ca.us
Cari Sneed	Claremont	csneed@ci.claremont.ca.us
Lisa O'Brien	La Verne	lobrien@ci.la-verne.ca.us
Rafferty Wooldridge	La Verne	rwooldridge@ci.la-verne.ca.us
Julie Carver	Pomona	julie_carver@ci.pomona.ca.us
Meg McWade	Pomona	Meg_McWade@ci.pomona.ca.us

April 28, 2015

Ms. Gail Farber, Director
County of Los Angeles
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

Ms. Gail Farber, Chief Engineer
Los Angeles County Flood Control District
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

APPROVAL, WITH CONDITIONS, OF THE ALAMITOS BAY/LOS CERRITOS CHANNEL WATERSHED MANAGEMENT AREA WATERSHED MANAGEMENT PROGRAM (WMP) PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Ms. Farber:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). Part VI.C of the LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land Development Program. Pursuant to Part VI.C.4.c of the LA County MS4 Permit, the County of Los Angeles (County) and the Los Angeles County Flood Control District (LACFCD) jointly submitted a draft WMP for the Alamitos Bay/Los Cerritos Channel (AB/LLC) Watershed Management Area (WMA) dated June 28, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the County's and LACFCD's draft WMP. A separate notice of availability regarding the draft WMPs, including the AB/LCC WMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received one comment letter that had specific comments on the County's and LACFCD's draft WMP and two letters that had comments on WMPs generally, which were in part applicable to the County's and LACFCD's draft WMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper and the other letters were from the Construction Industry Coalition on Water Quality (CICWQ) and a private citizen, Joyce Dillard. On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the County's and LACFCD's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 27, 2014, the Los Angeles Water Board sent a letter to the County and LACFCD detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the County's and LACFCD's WMP. The letter directed the County and LACFCD to submit a revised draft WMP addressing the Los Angeles Water Board's comments. Prior to the County's and LACFCD's submittal of the revised draft WMP, Board staff had a meeting on January 15, 2015, teleconferences, and e-mail exchanges with County representatives to discuss the Board's comments and the revisions to the draft WMP, including the supporting reasonable assurance analysis (RAA), which would address the Board's comments. The County and LACFCD submitted a revised draft WMP on January 27, 2015, for Los Angeles Water Board review and approval.

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the County's and LACFCD's January 27, 2015, revised draft WMP for the AB/LLC WMA. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. In Section 6.3.5.5 Full Capture Devices (Planned Structural BMP) of the revised draft WMP, pages 29 and 30, since the three catch basins can be retrofitted with full capture devices as confirmed during discussions with the County and LACFCD, delete the

following language: "Construction of the devices is contingent upon appropriate field conditions. CPS devices cannot be installed in areas where they may adversely affect flood protection or in catch basins that are too shallow to house CPS devices."

2. Correct the following typographical errors and omissions in the revised draft WMP:
   a. Figure 3, page 7, correct the "Notable Permit Date" for "5 years after MS4 Permit Effective Date" to Dec. 28, 2017; and
   b. Appendix B, Table B.1, include the wet weather data for diazinon.

The County and LACFCD shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than May 28, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit, the County and LACFCD shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, Permittees must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless of any contingencies indicated in the approved WMP (e.g., funding) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii. The Los Angeles Water Board will determine the County's and LACFCD's compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Section 5 "Watershed Control Measures;"
- Section 6.3.5 "Identification of Potential Non-Structural and Structural BMPs," which lists the existing and planned BMPs as well as identification of potential BMPs; and
- Section 6.3.6 "Schedule to Meet Needed Percent Reductions" Including Table 9 and Figures 18 and 19.

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit, the County's and LACFCD's full and timely compliance with all actions and dates for their achievement in their approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachment Q of the LA County MS4 Permit. Further, per Part VI.C.2.b of the LA County MS4 Permit, the County's and LACFCD's full compliance with all requirements and dates for their achievement in their approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit for the specific waterbody-pollutant combinations addressed by their approved WMP.

If the County and LACFCD Permittees fail to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the County's and LACFCD's Annual Reports and program audits (when conducted), the County and LACFCD shall be subject to the baseline requirements of the LA County MS4 Permit, including but not limited to demonstrating

compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c).

Annual Reporting

The County and LACFCD shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit. For multi-year efforts, the County and LACFCD shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or County/LACFCD approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention/infiltration projects, including LID due to new/redevelopment, green streets, and regional BMPs, the County and LACFCD shall report annually on the volume of stormwater retained within the area covered by the WMP.

The County and LACFCD shall also include in its Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit. Further, as part of the annual certification concerning a permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit, the County and LACFCD shall also certify in the Annual Report that it has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6). If a Permittee does not have legal authority to implement an action or milestone at the time the County and LACFCD submits its Annual Report, the Permittee shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The County and LACFCD shall conduct a comprehensive evaluation of the WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit. As part of this process, the County and LACFCD must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment Q of the LA County MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

The County's and LACFCD's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit, the County and LACFCD shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the County's Island and LACFCD's infrastructure that are collected through the County's and LACFCD's Coordinated Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The County and LACFCD must implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the Permittees' Report(s) of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the Permittees' ROWD.

The Regional Water Board appreciates the participation and cooperation of the County and LACFCD in the implementation of the LA County MS4 Permit. If you have any questions, please contact Rebecca Christmann, at Rebecca.Christmann@waterboards.ca.gov or by phone at (213) 576-5734. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief Storm Water Permitting Unit, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

cc: Angela George, Los Angeles County Flood Control District
Jolene Guerrero, County of Los Angeles, Department of Public Works
William Johnson, County of Los Angeles, Department of Public Works

April 28, 2015

Permittees of the Los Cerritos Channel Watershed Management Group[1]

APPROVAL, WITH CONDITIONS, OF THE LOS CERRITOS CHANNEL WATERSHED MANAGEMENT GROUP'S WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175) AND THE CITY OF LONG BEACH MS4 PERMIT (NPDES PERMIT NO. CAS004003; ORDER NO. R4-2014-0024)

Dear Permittees of the Los Cerritos Channel Watershed Management Group:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). On February 6, 2014, the Board adopted Order No. R4-2014-0024, *Waste Discharge Requirements for Municipal Separate Storm Sewer System Discharges from the City of Long Beach* (hereafter, Long Beach MS4 Permit). Part VI.C of the LA County MS4 Permit and Part VII.C of the Long Beach MS4 Permit allow Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs).

Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land

[1] Permittees of the Los Cerritos Channel Watershed Management Group include the Los Angeles County Flood Control District; and the cities of Bellflower, Cerritos, Downey, Lakewood, Long Beach, Paramount, and Signal Hill. See attached distribution list.

Development Program, of the LA County MS4 Permit.[2] Pursuant to Part VI.C.4.c of the LA County MS4 Permit and Part VII.C.4.c of the Long Beach MS4 Permit,, the Permittees of the Los Cerritos Channel Watershed Management Group (LCC WMG) jointly submitted a draft WMP dated June 28, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the LCC WMG's draft WMP. A separate notice of availability regarding the draft WMPs, including the LCC WMG draft WMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received two comment letters that had comments on WMPs generally, which were in part applicable to the LCC WMG draft WMP. One joint letter was from Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper, and the other letter was from the Construction Industry Coalition on Water Quality (CICWQ). On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the LCC WMG's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 29, 2014, the Los Angeles Water Board sent a letter to the LCC WMG detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the LCC WMG's WMP. The letter directed the LCC WMG to submit a revised draft WMP addressing the Los Angeles Water Board's comments. Prior to the LCC WMG's submittal of the revised draft WMP, Board staff had a meeting on January 23, 2015 with LCC WMG representatives and consultants to discuss the Board's comments and the revisions to the draft WMP, including the supporting reasonable assurance analysis (RAA), which would address the Board's comments. The LCC WMG submitted a revised draft WMP on January 29, 2015 for Los Angeles Water Board review and approval.

[2] Equivalent requirements in the Long Beach MS4 Permit are as follows: Part VI.A (Receiving Water Limitations), Part VIII (Total Maximum Daily Load Provisions), Part IV.B (Prohibitions – Non-Storm Water Discharges), and Part VII.D-VII.M (Minimum Control Measures).

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the LCC WMG's January 29, 2015 revised draft WMP. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Revise the discussion of ammonia in Section 5.2.2 of the revised draft WMP to include that the Permittees of the LCC WMG will monitor ammonia and pH as part of their Coordinated Integrated Monitoring Program and will re-evaluate ammonia as part of the adaptive management evaluation.
2. Revise the Phase 1 (2015-2017) milestones on Table 6-5 of the revised draft WMP (pg. 6-8) as follows:
    a. Remove the footnote that conditions "TSS Reduction" and "Runoff Reduction and Stormwater Capture" milestones on trash amendment adoption (i.e., remove reference to the language: "Presuming adoption of trash amendments by State Water Board in spring of 2015").
    b. Revise the table to include the specific days for milestone achievement rather than just the year and the quarter. For example, "Adoption of model TSS reduction ordinances by City of Signal Hill" should have a completion date of *December 31, 2015* instead of *Q4, 2015*.
    c. For the "Construction of initial stormwater capture facility" milestone, replace "if funding available" with "as needed to achieve volume reduction milestones." If the Permittees of the LCC WMG cannot identify a funding source, they may submit a request for extension of the milestone deadline to the Los Angeles Water Board's Executive Officer.
3. Revise the Phase 2 (2018-2020) milestones on Table 6-7 of the revised draft WMP (pg. 6-12) by replacing the language "subject to availability of funding" with "as needed to achieve volume reduction milestones." If the Permittees of the LCC WMG cannot identify a funding source, they may submit a request for extension of the milestone deadline to the Los Angeles Water Board's Executive Officer.
4. The City of Long Beach submitted its Statement of Legal Authority to the Los Angeles Water Board on February 26, 2015. Include this Statement of Legal Authority in the WMP appendix section containing the other Permittees' legal authority statements.

The LCC WMG shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than June 12, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit and Part VII.C.6 of the Long Beach MS4 Permit, the Permittees of the LCC WMG shall begin implementation of the approved WMP

immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, Permittees must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless of any contingencies indicated in the approved WMP (e.g., funding) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii of the LA County MS4 Permit, and/or Part VII.C.6 or Part VII.C.8.b-c of the Long Beach MS4 Permit. The Los Angeles Water Board will determine the LCC Permittees' compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Sections 4.3 Minimum Control Measures, 4.4 Non-Stormwater Discharge Control Measures, 4.5 TMDL Control Measures, 4.6 Non-TMDL Impaired Waters Control Measures, 4.7 Control Measures for Non-Impairment Pollutants, 4.8 Control Measures to be Implemented at the Watershed and Sub-watershed Levels, and 4.9 Control Measures to be Implemented at the Jurisdictional Level
- Table 4-3: New Fourth Term MS4 Permit Non-Structural MCMs (Cities only) and NSWDs
- Table 6-1: Final Compliance Dates for Category 1, 2, and 3 Pollutants
- Table 6-2: Interim Milestone Targets between December 28, 2012 and December 28, 2017
- Table 6-3: Summary WMP Implementation and Milestone Schedule
- Table 6-4: WMP Implementation Schedule – Ongoing Measures Phase 1
- Table 6-5: WMP Implementation Schedule – Measures with Interim Milestones Phase 1
- Table 6-6: WMP Implementation Schedule – Ongoing Measures Phase 2
- Table 6-7: WMP Implementation Schedule – Measures with Interim Milestones Phase 2
- Table 6-12: Sub-Basin Implementation Measures
- RAA Attachment B: Detailed Jurisdictional Compliance Tables

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit[3], the LCC Permittees' full and timely compliance with all actions and dates for their achievement in their approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachments N and Q of the LA County MS4 Permit.[4] Further, per Part VI.C.2.b of the LA County MS4 Permit and Part VII.C.2.e of the Long Beach MS4 Permit, the LCC Permittees' full compliance with all requirements and dates for their achievement in their approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit and Part VI.A of the Long Beach MS4 Permit for the specific waterbody-pollutant combinations addressed by their approved WMP.

[3] Corresponding provisions in the Long Beach MS4 Permit are Parts VII.C.3 and VIII.E.1.d.

[4] Corresponding provisions in the Long Beach MS4 Permit are Part VIII (general TMDL provisions) and Parts VIII.J and VIII.P (provisions specific to Los Cerritos Channel and Greater Harbor TMDLs).

If the Permittees in the LCC WMG fail to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the LCC WMG's Annual Reports and program audits (when conducted), the Permittees in the LCC WMG shall be subject to the baseline requirements of the LA County MS4 Permit and the Long Beach MS4 Permit, including demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c) of the LA County MS4 Permit, and Parts VII.C.2.f and VIII.E.1.d.iii of the Long Beach MS4 Permit.

Annual Reporting

The LCC WMG shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through their Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit and Attachment E, Parts XV to XIX of the Long Beach MS4 Permit. For multi-year efforts, the LCC WMG shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention/infiltration projects, including LID due to new/redevelopment, green streets, and regional BMPs, the Permittees in the LCC WMG shall report annually on the volume of stormwater retained in the area covered by the LCC WMG WMP. The LCC WMG shall also report annually on runoff reduction, total suspended solids (TSS) reduction, and pollutant reductions from source control in light of its Water Quality Improvement Strategy.

The LCC WMG shall also include in their Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit and Part VII.A.3 of the Long Beach MS4 Permit. Further, as part of the annual certification concerning a Permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit and Part VII.A.2.b of the Long Beach MS4 Permit, each Permittee in the LCC WMG shall also certify in the Annual Report that each has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6) of the LA County MS4 Permit and Part VII.C.5.vi of the Long Beach MS4 Permit. If a Permittee does not have legal authority to implement an action or milestone at the time the LCC WMG submits their Annual Report, the Permittee shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The LCC WMG shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit and Part VII.C.8 of the Long Beach MS4 Permit. As part of this process, the LCC WMG must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachments N and Q of the LA County MS4 Permit and Parts VIII.J, and VIII.P of the Long Beach MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

The LCC WMG's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit and Attachment E, Part XVIII.6 of the Long Beach MS4 Permit, the LCC WMG shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the LCC WMP area that are collected through the LCC WMG's Coordinated Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The Permittees of the LCC WMG must implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modification if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the LA County MS4 Permittees' Report(s) of Waste Discharge (ROWD) are due no later than July 1, 2017 and the City of Long Beach's ROWD is due no later than September 29, 2018. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of

the first adaptive management cycle should be submitted in conjunction with the Permittees' ROWD.

The Los Angeles Water Board appreciates the participation and cooperation of the LCC WMG in the implementation of the LA County MS4 Permit. If you have any questions, please contact Chris Lopez at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. Alternatively, you may also contact Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosure: Mailing Distribution List

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CALIFORNIA
Water Boards

Los Angeles Regional Water Quality Control Board

April 28, 2015

Permittees of the Lower Los Angeles River Watershed Management Group[1]

APPROVAL, WITH CONDITIONS, OF THE LOWER LOS ANGELES RIVER GROUP'S WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175) AND THE CITY OF LONG BEACH MS4 PERMIT (NPDES PERMIT NO. CAS004003; ORDER NO. R4-2014-0024)

Dear Permittees of the Lower Los Angeles River Watershed Management Group:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). On February 6, 2014, the Board adopted Order No. R4-2014-0024, *Waste Discharge Requirements for Municipal Separate Storm Sewer System Discharges from the City of Long Beach* (hereafter, Long Beach MS4 Permit). Part VI.C of the LA County MS4 Permit and Part VII.C of the Long Beach MS4 Permit allow Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs).

Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land

[1] Permittees of the Lower Los Angeles River Watershed Management Group include the Los Angeles County Flood Control District; and the cities of Downey, Lakewood, Long Beach, Lynwood, Paramount, Pico Rivera, Signal Hill, and South Gate. See attached distribution list.

Development Program, of the LA County MS4 Permit.[2] Pursuant to Part VI.C.4.c of the LA County MS4 Permit and Part VII.C.4.c of the Long Beach MS4 Permit, the Permittees of the Lower Los Angeles River Watershed Management Group (LLAR WMG) jointly submitted a draft WMP dated June 27, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the LLAR WMG's draft WMP. A separate notice of availability regarding the draft WMPs, including the LLAR WMG draft WMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received two comment letters that had comments on WMPs generally, which were in part applicable to the LLAR WMG draft WMP. One joint letter was from Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper, and the other letter was from the Construction Industry Coalition on Water Quality (CICWQ). On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the LLAR WMG's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 28, 2014, the Los Angeles Water Board sent a letter to the LLAR WMG detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the LLAR WMG's WMP. The letter directed the LLAR WMG to submit a revised draft WMP addressing the Los Angeles Water Board's comments. Prior to the LLAR WMG's submittal of the revised draft WMP, Board staff had a meeting on January 23, 2015 with LLAR WMG representatives and consultants to discuss the Board's comments and the revisions to the draft WMP, including the supporting reasonable assurance analysis (RAA), which would address the Board's comments. The LLAR WMG submitted a revised draft WMP on January 28, 2015 for Los Angeles Water Board review and approval.

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the LLAR WMG's January 28, 2015 revised draft WMP. The Board may rescind this approval if all of the

[2] Equivalent requirements in the Long Beach MS4 Permit are as follows: Part VI.A (Receiving Water Limitations), Part VIII (Total Maximum Daily Load Provisions), Part IV.B (Prohibitions – Non-Storm Water Discharges), and Part VII.D-VII.M (Minimum Control Measures).

following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Revise the Load Reduction Strategy (LRS) schedule for Los Angeles River Estuary as outlined in Table 3-8 of the revised draft WMP as follows:
    a. Revise "Submit LRS to Regional Board" deadline to April 28, 2017.
    b. Revise "Complete Implementation of LRS" deadline to October 28, 2021.
    c. Revise deadlines for the achievement of interim or final dry-weather WQBELs to October 28, 2024.
    d. Revise dates included in the asterisked comment such that, if applicable, a second phase LRS is submitted by October 28, 2025; second phase LRS implementation is completed by April 28, 2029; and final WQBELs are achieved by April 28, 2031.
2. Include the revised LRS schedule for Los Angeles River Estuary (Table 3-8) in Chapter 5 of the revised draft WMP as part of the LLAR WMG's compliance schedule.
3. Correct Table 3-2 of the revised draft WMP (pg. 3-9) so that it shows that the City of Paramount will implement the new fourth term nonstructural minimum control measures. Additionally, revise any inapplicable control measures inadvertently listed for LACFCD.
4. Revise Section 5.2 of the revised draft WMP to include a table that lists definitive interim and final milestone achievement dates and the responsible Permittee(s) for each LID BMP in the Proposition 84 project. The responsible Permittees within the LLAR WMG will be responsible for meeting these milestone achievement dates. Currently, the revised WMP only provides "expected" dates for construction and completion.
5. Correct the units for the cadmium concentrations (i.e. 0.55 mg/L and 0.26 mg/L) referenced in Section 2.2.5 of the revised draft WMP (pg. 2-23).
6. Revise Table 5-1 of the revised draft WMP to state that for control measures listed as being a "jurisdictional effort," the Permittees that are responsible for completion of each milestone are identified in Table 3-11.
7. Revise Table 5-1 of the revised draft WMP to include the milestones and milestone completion dates for the following targeted control measures (TCMs) as follows:
    a. TCM-PLD-2 (LID Ordinance): Remove the phrase "when practicable" and set a milestone date for ordinance adoption to 12/28/17 (i.e., end of permit term).
    b. TCM-TSS-1 (Exposed Soil Ordinance): Remove the phrase "if practicable" from the milestone description.
    c. TCM-TSS-3 (Private Lot Sweeping Ordinance): Remove the phrase "when practicable" from the milestone description.
    d. TCM-RET-1 (Encourage downspout disconnects): Identify interim milestone(s) and date(s) for milestone achievement and include in table.
8. Remove "Statewide Trash Amendments" from Table 5-1 of the revised draft WMP, since the amendments are inapplicable to the Los Angeles River Watershed given the existing trash TMDL, and change the Chapter 3 ID for "Increased street sweeping frequency or routes" to TCM-PAA-3.

9. In Section 4.3 of the revised draft WMP, include references to Table 3-2, Table 3-11, and any other relevant tables that list BMPs contributing to the 10% pollutant reduction assumption for non-modeled BMPs.
10. Provide further detail and specificity in Section 3.4.2.2 of the revised draft WMP on what incentives are being included in TCM-NSWD-1 and whether any incentives are being offered apart from Metropolitan Water District's rebate program.
11. The City of Long Beach submitted its Statement of Legal Authority to the Los Angeles Water Board on February 26, 2015. Include this Statement of Legal Authority in the WMP appendix section containing the other Permittees' legal authority statements.

The LLAR WMG shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than June 12, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit and Part VII.C.6 of the Long Beach MS4 Permit, the Permittees of the LLAR WMG shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, Permittees must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless of any contingencies indicated in the approved WMP (e.g., funding) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii of the LA County MS4 Permit, and/or Part VII.C.6 or Part VII.C.8.b-c of the Long Beach MS4 Permit. The Los Angeles Water Board will determine the LLAR Permittees' compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Pollutant Reduction Plan to Attain Interim & Final Limits (Section 5.4)
- Nonstructural Best Management Practices Schedule, including Table 5-1 Nonstructural TCM Compliance Schedule (Section 5.1)
- List of Nonstructural Targeted Control Measures, including Table 3-11 Nonstructural TCMs (Section 3.4.2)
- Proposition 84 Grant Award LID BMPs (Section 5.2)
- Structural Best Management Practice Schedule (Section 5.3)
- RAA Attachment B: Detailed Jurisdictional Compliance Tables

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit[3], the LLAR Permittees' full and timely compliance with all actions and dates for their achievement in their approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachment O of the LA County MS4 Permit.[4] Further, per Part

[3] Corresponding provisions in the Long Beach MS4 Permit are Parts VII.C.3 and VIII.E.1.d.

[4] Corresponding provisions in the Long Beach MS4 Permit are Part VIII (general TMDL provisions) and Parts VIII.K, VIII.L, VIII.M, VIII.N, and VIII.O (provisions specific to Los Angeles River Watershed TMDLs).

VI.C.2.b of the LA County MS4 Permit and Part VII.C.2.e of the Long Beach MS4 Permit, the LLAR Permittees' full compliance with all requirements and dates for their achievement in their approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit and Part VI.A of the Long Beach MS4 Permit for the specific waterbody-pollutant combinations addressed by their approved WMP.

If the Permittees in the LLAR WMG fail to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the LLAR WMG's Annual Reports and program audits (when conducted), the Permittees in the LLAR WMG shall be subject to the baseline requirements of the LA County MS4 Permit and the Long Beach MS4 Permit, including demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c) of the LA County MS4 Permit, and Parts VII.C.2.f and VIII.E.1.d.iii of the Long Beach MS4 Permit.

Annual Reporting

The LLAR WMG shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through their Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit and Attachment E, Parts XV to XIX of the Long Beach MS4 Permit. For multi-year efforts, the LLAR WMG shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention/infiltration projects, including LID due to new/redevelopment, green streets, and regional BMPs, the Permittees in the LLAR WMG shall report annually on the volume of stormwater retained in the area covered by the LLAR WMG WMP. The LLAR WMG shall also report annually on runoff reduction, total suspended solids (TSS) reduction, and pollutant reductions from source control.

The LLAR WMG shall also include in their Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit and Part VII.A.3 of the Long Beach MS4 Permit. Further, as part of the annual certification concerning a Permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit and Part VII.A.2.b of the Long Beach MS4 Permit, each Permittee in the LLAR WMG shall also certify in the Annual Report that each has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6) of the LA County MS4 Permit and Part VII.C.5.vi of the Long Beach MS4 Permit. If a Permittee does not have legal authority to implement an action or milestone at the time the

LLAR WMG submits their Annual Report, the Permittee shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The LLAR WMG shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit and Part VII.C.8 of the Long Beach MS4 Permit. As part of this process, the LLAR WMG must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment O of the LA County MS4 Permit and Parts VIII.K, VIII.L, VIII.M, VIII.N, and VIII.O of the Long Beach MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
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The Los Angeles Water Board appreciates the participation and cooperation of the LLAR WMG in the implementation of the LA County MS4 Permit. If you have any questions, please contact Chris Lopez at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. Alternatively, you may also contact Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger, P.E.
Executive Officer

Enclosure: Mailing Distribution List

Lower Los Angeles River Watershed Management Group
Mailing Distribution List (via email)

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tgrant@dpw.lacounty.gov

April 28, 2015

Permittees of the Lower San Gabriel River Watershed Management Group[1]

APPROVAL, WITH CONDITIONS, OF THE LOWER SAN GABRIEL RIVER GROUP'S WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175) AND THE CITY OF LONG BEACH MS4 PERMIT (NPDES PERMIT NO. CAS004003; ORDER NO. R4-2014-0024)

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Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land

[1] Permittees of the Lower San Gabriel River Management Group include the Los Angeles County Flood Control District and the cities of Artesia, Bellflower, Cerritos, Diamond Bar, Downey, Hawaiian Gardens, La Mirada, Lakewood, Long Beach, Norwalk, Pico Rivera, Santa Fe Springs, and Whittier. See attached distribution list.

Development Program, of the LA County MS4 Permit.[2] Pursuant to Part VI.C.4.c of the LA County MS4 Permit and Part VII.C.4.c of the Long Beach MS4 Permit, the Permittees of the Lower San Gabriel River Watershed Management Group (LSGR WMG) jointly submitted a draft WMP dated June 27, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

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Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 28, 2014, the Los Angeles Water Board sent a letter to the LSGR WMG detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the LSGR WMG's WMP. The letter directed the LSGR WMG to submit a revised draft WMP addressing the Los Angeles Water Board's comments. Prior to the LSGR WMG's submittal of the revised draft WMP, Board staff had a meeting on January 23, 2015 with LSGR WMG representatives and consultants to discuss the Board's comments and the revisions to the draft WMP, including the supporting reasonable assurance analysis (RAA), which would address the Board's comments. The LSGR WMG submitted a revised draft WMP on January 28, 2015 for Los Angeles Water Board review and approval.

[2] Equivalent requirements in the Long Beach MS4 Permit are as follows: Part VI.A (Receiving Water Limitations), Part VIII (Total Maximum Daily Load Provisions), Part IV.B (Prohibitions – Non-Storm Water Discharges), and Part VII.D-VII.M (Minimum Control Measures).

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the LSGR WMG's January 28, 2015 revised draft WMP. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Revise Table 5-1 of the revised draft WMP to state that for control measures listed as being a "jurisdictional effort," the Permittees that are responsible for milestone completion are identified in Table 3-5.
2. Revise Table 5-1 of the revised draft WMP to include the milestones and milestone completion dates for the following targeted control measures (TCMs) as follows:
    a. TCM-PLD-2 (LID Ordinance): Remove the phrase "when practicable" and set a milestone date for ordinance adoption to 12/28/17 (i.e., end of permit term).
    b. TCM-TSS-1 (Exposed Soil Ordinance): Remove the phrase "if practicable" from the milestone description.
    c. TCM-TSS-3 (Private Lot Sweeping Ordinance): Remove the phrase "when practicable" from the milestone description.
    d. TCM-RET-1 (Encourage downspout disconnects): Identify interim milestone(s) and date(s) for milestone achievement and include in table.
3. Revise Section 5.2 of the revised draft WMP to include a table that lists definitive interim and final milestone achievement dates and the responsible Permittees for the Proposition 84 projects. Currently, the revised draft WMP only provides "expected" dates for construction and completion. The responsible Permittees within the LSGR WMG will be responsible for meeting these milestone achievement dates.
4. In Section 4.3 of the revised draft WMP, include references to Table 3-2, Table 3-5, and any other relevant tables that list BMPs contributing to the 10% pollutant reduction assumption for non-modeled BMPs.
5. Provide further detail and specificity in Section 3.4.1.3 of the revised draft WMP on what incentives are being included in TCM-NSWD-1 and whether any incentives are being offered apart from Metropolitan Water District's rebate program.
6. Revise the last sentence of Section 5.4.14 of the revised draft WMP to the following: "If it is determined through the adaptive management process that required bacteria load reductions may not be met by controlling for zinc, then the WMP will be modified to incorporate bacteria milestones with measureable criteria or indicators consistent with any future bacteria TMDL for the San Gabriel River and with, at the latest, a final deadline of 2040."
7. The City of Long Beach submitted its Statement of Legal Authority to the Los Angeles Water Board on February 26, 2015. Include this Statement of Legal Authority in the WMP appendix section containing the other Permittees' legal authority statements.

The LSGR WMG shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than June 12, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit and Part VII.C.6 of the Long Beach MS4 Permit, the Permittees of the LSGR WMG shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, Permittees must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless of any contingencies indicated in the approved WMP (e.g., funding) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii of the LA County MS4 Permit, and/or Part VII.C.6 or Part VII.C.8.b-c of the Long Beach MS4 Permit. The Los Angeles Water Board will determine the LSGR Permittees' compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Pollutant Reduction Plan to Attain Interim & Final Limits (Section 5.4)
- Nonstructural Best Management Practices Schedule (Section 5.1)
- Table 3-2 New Fourth Term MS4 Permit Nonstructural MCMs (Cities only) and NSWD Measures (Section 3.2.4)
- Table 3-5 Nonstructural TCMs (Section 3.4.1)
- Proposition 84 Grant Award LID BMPs (Section 5.2)
- Structural Best Management Practice Schedule (Section 5.3)
- RAA Attachment B: Detailed Jurisdictional Compliance Tables

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit[3], the LSGR Permittees' full and timely compliance with all actions and dates for their achievement in their approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachments N and P of the LA County MS4 Permit.[4] Further, per Part VI.C.2.b of the LA County MS4 Permit and Part VII.C.2.e of the Long Beach MS4 Permit, the LSGR Permittees' full compliance with all requirements and dates for their achievement in their approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit and Part VI.A of the Long Beach MS4 Permit for the specific waterbody-pollutant combinations addressed by their approved WMP.

[3] Corresponding provisions in the Long Beach MS4 Permit are Parts VII.C.3 and VIII.E.1.d.

[4] Corresponding provisions in the Long Beach MS4 Permit are Part VIII (general TMDL provisions) and Parts VIII.P and VIII.Q (provisions specific to the Greater Harbors and San Gabriel River Watershed TMDLs).

If the Permittees in the LSGR WMG fail to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the LSGR WMG's Annual Reports and program audits (when conducted), the Permittees in the LSGR WMG shall be subject to the baseline requirements of the LA County MS4 Permit and the Long Beach MS4 Permit, including demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c) of the LA County MS4 Permit, and Parts VII.C.2.f and VIII.E.1.d.iii of the Long Beach MS4 Permit.

Annual Reporting

The LSGR WMG shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through their Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit and Attachment E, Parts XV to XIX of the Long Beach MS4 Permit. For multi-year efforts, the LSGR WMG shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention/infiltration projects, including LID due to new/redevelopment, green streets, and regional BMPs, the Permittees in the LSGR WMG shall report annually on the volume of stormwater retained in the area covered by the LSGR WMG WMP. The LSGR WMG shall also report annually on runoff reduction, total suspended solids (TSS) reduction, and pollutant reductions from source control.

The LSGR WMG shall also include in their Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit and Part VII.A.3 of the Long Beach MS4 Permit. Further, as part of the annual certification concerning a Permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit and Part VII.A.2.b of the Long Beach MS4 Permit, each Permittee in the LSGR WMG shall also certify in the Annual Report that it has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6) of the LA County MS4 Permit and Part VII.C.5.vi of the Long Beach MS4 Permit. If a Permittee does not have legal authority to implement an action or milestone at the time the LSGR WMG submits their Annual Report, the Permittee shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The LSGR WMG shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit and Part VII.C.8 of the Long Beach MS4 Permit. As part of this process, the LSGR WMG must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachments N and P of the LA County MS4 Permit and Parts VIII.P and VIII.Q of the Long Beach MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

The LSGR WMG's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit and Attachment E, Part XVIII.6 of the Long Beach MS4 Permit, the LSGR WMG shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the LSGR WMP area that are collected through the LSGR WMG's Coordinated Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The Permittees of the LSGR WMG must implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modification if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the LA County MS4 Permittees' Report(s) of Waste Discharge (ROWD) are due no later than July 1, 2017 and the City of Long Beach's ROWD is due no later than September 29, 2018. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of

the first adaptive management cycle should be submitted in conjunction with the Permittees' ROWD.

Review by the State Water Board

The Los Angeles Water Board appreciates the participation and cooperation of the LSGR WMG in the implementation of the LA County MS4 Permit. If you have any questions, please contact Chris Lopez at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. Alternatively, you may also contact Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosure: Mailing Distribution List

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April 28, 2015

Permittees of the Los Angeles River Upper Reach 2 Watershed Management Group[1]

APPROVAL, WITH CONDITIONS, OF THE LOS ANGELES RIVER UPPER REACH 2 WATERSHED MANAGEMENT GROUP'S WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees of the Los Angeles River Upper Reach 2 Watershed Management Group:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). Part VI.C of the LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land Development Program. Pursuant to Part VI.C.4.c of the LA County MS4 Permit, the Permittees of the Los Angeles River Upper Reach 2 Watershed Management Group (LAR UR2 WMG) jointly submitted a draft WMP dated June 26, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the ULAR2 WMG's draft WMP. A separate notice of availability regarding the

[1] Permittees of the Los Angeles River Upper Reach 2 Watershed Management Group include the cities of Bell, Bell Gardens, Commerce, Cudahy, Huntington Park, Maywood, Vernon, and the Los Angeles County Flood Control District. See attached distribution list.

draft WMPs, including the ULAR2 WMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received three comment letters, including a joint letter from Heal the Bay, Los Angeles Waterkeeper, and the Natural Resources Defense Council; a letter from the Construction Industry Coalition on Water Quality; and a letter from Joyce Dillard, a private citizen, which were in part applicable to the LAR UR2 WMG draft WMP. On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the LAR UR2 WMG's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMP. On October 27, 2014, the Los Angeles Water Board sent a letter to the LAR UR2 WMG detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the LAR UR2 WMG's WMP. The letter directed the LAR UR2 WMG to submit a revised draft WMP addressing the Los Angeles Water Board's comments. Prior to the LAR UR2 WMG's submittal of the revised draft WMP, Board staff had a meeting on December 3, 2014 with LAR UR2 WMG representatives and consultants and subsequent e-mail exchanges to discuss the Board's comments and the revisions to the draft WMP, including the supporting reasonable assurance analysis (RAA), which would address the Board's comments. The LAR UR2 WMG submitted its revised draft WMP on January 27, 2015, for Los Angeles Water Board review and approval.

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the LAR UR2 WMG's January 27, 2015 revised draft WMP. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Remove the following language in Section 1.3.1.1. of the revised draft WMP (p. 15): "The Cities are reserving all of their rights to subsequently assert that the identified BMPs need not be implemented, on the grounds that they are not technically or economically feasible. In other words, that the BMPs are impracticable and contrary to the MEP standard, and that it is not possible to provide the reasonable assurances required under the Permit in a manner that is consistent with the MEP standard, if at all. The Cities agree that it is not possible to provide the reasonable assurances required under the Permit in a manner that is consistent with the MEP standard." It is unclear to the Los Angeles Water Board what the LAR UR2 WMG's intention is of including this language. The Board finds this language confusing and inconsistent with the provisions

of the permit. Development and implementation of WMPs are voluntary. Permittees may reserve their rights to challenge the permit, but Permittees must still comply with permit provisions either through the baseline requirements of the permit or through an approved WMP. To the extent the LAR UR2 WMG determines that any BMPs identified in its approved WMP should not be implemented due to infeasibility or impracticability, the LAR UR2 WMG must propose modifications to its approved WMP as part of the adaptive management process for Los Angeles Water Board review and approval. If you prefer, you can replace the stricken language above with the following language: "Nothing in this WMP shall affect the Cities' administrative petitions, nor shall anything in this WMP constitute a waiver of any positions or rights therein."[2]In Table 1-6 of the revised draft WMP, include First Phase deadlines for full implementation of the LAR UR2 WMG's Load Reduction Strategy (LRS) of March 23, 2019 for Segment B and September 23, 2020 for Segment B Tributaries, respectively, per the LA County MS4 Permit, Attachment O, Table O-1. Include implementation actions and milestones associated with full implementation of the Segment B LRS by March 23, 2019, including interim milestones within this permit term.

2. Reference the Los Angeles River Bacteria TMDL LRS, which was submitted by the LAR UR2 WMG in December 2014, in Section 3.1.5 of the revised draft WMP and include specific steps and dates for their achievement to be taken to investigate outlier outfalls consistent with the general approach of the LRS.
3. Section 3.1.5 of the revised draft WMP notes that the remaining catch basins that are not retrofitted with full capture devices are incompatible with the devices and will probably require significant and costly reconstruction prior to October 1, 2015. Revise the revised draft WMP to include a strategy to comply with the Los Angeles River Trash TMDL. When drafting a strategy, the LAR UR2 WMG should consider the language in the Tentative Basin Plan Amendment for the Reconsideration of the Los Angeles River Watershed Trash TMDL, which was publicly noticed on April 3, 2015.
4. Delete the reference to "Potential" and "Proposed" in Table 3-8 and revise table to only include specific commitments to non-structural BMP enhanced implementation actions. Indicate each Permittee's specific commitment(s) to each action in Table 3-8 "Potential Non-Structural BMP Enhanced Implementation Efforts," since these actions are the basis for the 5% load reduction from baseline.
5. Revise the revised draft WMP to present all model results of pollutant loads, allowable loads, target load reductions, and load reductions associated with control measures in units consistent with the respective TMDL (e.g., Los Angeles River Metals TMDL allowable loads should be given as daily loads not annual loads in Table 4-3). Each table in Section 4.0 must include units per time step (e.g., lbs/day) for the numeric values for clarity.

[2] This alternative language is included in two other revised draft WMPs and is acceptable to the Los Angeles Water Board. See footnote 23 of the Lower Los Angeles River revised draft WMP and footnote 17 of the Lower San Gabriel River revised draft WMP.

6. Section 4.5, Modeling Calibration, of the revised draft WMP discusses a comparison of SBPAT and LSPC runoff volumes "to show the difference between simulated and observed values to ensure the model properly assess conditions and variables." Provide this comparison of SBPAT and LSPC runoff volumes as an appendix or subsection to the model calibration section.
7. In Table 5-1 of the revised draft WMP, "Tentative Control Measure Implementation Schedule," delete all instances of the word "tentative." If you prefer, you can replace the word "tentative" with "approved" or "current." In the last sentence of the second paragraph of Section 5.1, change the sentence "The WMP, including the schedule aspect, will be updated through the adaptive management process, therefore the schedule identified is always tentative." to "The WMP, including the schedule aspect, will be updated through the adaptive management process; to that extent, the schedule identified is tentative unless the schedule is associated with TMDL provisions. However, any extensions of the dates in this schedule must be approved by the Los Angeles Water Board's Executive Officer pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii of the LA County MS4 Permit." Where there is a failure to meet scheduled milestones without obtaining Executive Officer approval (or non-objection in the case of Part VI.C.8.a.iii of the LA County MS4 Permit), then the Permittees in the LAR UR2 WMG shall be subject to the baseline requirements of the LA County MS4 Permit, including demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c) of the LA County MS4 Permit.
8. Include interim milestones for LID Street implementation for each Permittee, associated with the LID Street Required Tributary Area by LAR UR2 WMG WMA Permittee in Table 5-1 and Figures 5-1 to 5-4 of the revised draft WMP that demonstrate progress toward achieving the final deadline of 2037.
9. In addition to conducting inspections and follow-up enforcement as required under the 2012 LA County MS4 Permit Industrial/Commercial Facilities Program, include specific actions and interim dates to *enhance* industrial facility inspections and follow-up enforcement, if necessary, particularly in those jurisdictions where industrial land use comprises a significant portion of the land area (e.g., Commerce and Vernon) to achieve the "Non-MS4 NPDES Parcels" control measure by December 2017 as indicated in Table 5-1 of the revised draft MS4. Indicate each Permittee's responsibilities for these actions. Indicate how efforts will be focused on achieving progress toward reducing discharges of zinc and bacteria. Related to this, correct discussion in Section 4.3.2.3 of the revised draft WMP, which states that the 2001 LA County MS4 Permit did not require that Permittees enforce BMPs at industrial and commercial facilities. The 2001 LA County MS4 Permit did require Permittees to conduct progressive enforcement, per Part 4.C.3.c) and d) of the 2001 LA County MS4 Permit. Therefore, enforcement is not a change from the 2001 permit.

The LAR UR2 WMG shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than June 12, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit, the Permittees of the LAR UR2 WMG shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, Permittees must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless of any contingencies indicated in the approved WMP (e.g., funding and purported reservation of rights) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii. The Los Angeles Water Board will determine the LAR UR2 WMG Permittees' compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Section 3 "Watershed Control Measures," including Section 3.3 "Proposed Control Measures;"
- Table 3-1 "LAR Metals TMDL Jurisdictional Group 2 Non-Structural BMPs Phased Implementation Plan;"
- Table 3-8 "~~Potential~~ Non-Structural BMP Enhanced Implementation Efforts;"
- Table 4-10 "LID Street Required Tributary area by LAR UR2 WMA Permittee;"
- Tables 4-17 to 4-20, which present load reductions associated with non-structural BMPs, regional BMPs, and distributed BMPs;
- Table 5-1 "~~Tentative~~ Control Measure Implementation Schedule" which establishes the implementation dates for non-structural BMPs, regional BMPs, and distributed BMPs; and
- Additional compliance actions and milestones established in response to Conditions 1, 2, 8 and 9, above.

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit, the LAR UR2 WMG Permittees' full and timely compliance with all actions and dates for their achievement in their approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachment O of the LA County MS4 Permit. Further, per Part VI.C.2.b of the LA County MS4 Permit, the LAR UR2 WMG Permittees' full compliance with all requirements and dates for their achievement in their approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit for the specific waterbody-pollutant combinations addressed by their approved WMP.

If the Permittees in the LAR UR2 WMG fail to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the LAR UR2 WMG's Annual Reports and program audits (when conducted), the Permittees in the LAR UR2 WMG shall be subject to the baseline requirements of the LA County MS4 Permit, including demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c).

Annual Reporting

The LAR UR2 WMG shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit. For multi-year efforts, the LAR UR2 WMG shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention projects, including but not limited to LID due to new/redevelopment, green streets, and regional BMPs, the Permittees in the LAR UR2 WMG shall report annually on the volume of stormwater retained in each jurisdictional subwatershed area.

The LAR UR2 WMG shall also include in its Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit. Further, as part of the annual certification concerning a permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit, each Permittee in the LAR UR2 WMG shall also certify in the Annual Report that it has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6). If a Permittee does not have legal authority to implement an action or milestone at the time the LAR UR2 WMG submits its Annual Report, the Permittee shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The LAR UR2 WMG shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit. As part of this process, the LAR UR2 WMG must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment O of the LA County MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

The LAR UR2 WMG's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit, the LAR UR2 WMG shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the LAR UR2 WMG WMP area that are collected through the LAR UR2 WMG's Coordinated Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The Permittees of the LAR UR2 WMG must implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the Permittees' Report(s) of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the Permittees' ROWD.

The Los Angeles Water Board appreciates the participation and cooperation of the LAR UR2 WMG in the implementation of the LA County MS4 Permit. If you have any questions, please contact Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

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April 28, 2015

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APPROVAL, WITH CONDITIONS, OF THE CITY OF LOS ANGELES AREA IN SANTA MONICA BAY JURISDICTIONAL GROUP 7 SUBWATERSHED WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Dr. Kharaghani and Ms. Farber:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). Part VI.C of the LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land Development Program. Pursuant to Part VI.C.4.c of the LA County MS4 Permit, the City of Los Angeles (City) and the Los Angeles County Flood Control District (LACFCD) jointly submitted a draft WMP for the City's land area and the LACFCD's infrastructure within Jurisdictional Group 7 (JG7) of the Santa Monica Bay (SMB) Watershed Management Area (WMA) dated June 27, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the City's and LACFCD'S draft WMP. A separate notice of availability regarding the draft WMPs, including the City's and LACFCD's draft WMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received two comment letters that had specific comments on the City's and LACFCD's draft WMP and one letter that had comments on WMPs generally, which were in part applicable to the City's and LACFCD's draft WMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper and the other letters were from the Construction Industry Coalition on Water Quality (CICWQ) and a private citizen, Joyce Dillard. On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for Permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the City's and LACFCD's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 27, 2014, the Los Angeles Water Board sent a letter to the City and LACFCD detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the City's and LACFCD's WMP. The letter directed the City and LACFCD to submit a revised draft WMP addressing the Los Angeles Water Board's comments. Prior to the City's and LACFCD's submittal of the revised draft WMP, Board staff had teleconferences and e-mail exchanges with City representatives to discuss the Board's comments and the revisions to the draft WMP, which would address the Board's comments. The City and LACFCD submitted a revised draft WMP on January 27, 2015, for Los Angeles Water Board review and approval.

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the City's and LACFCD's January 27, 2015, revised draft WMP for the City's land area and the LACFCD's infrastructure within JG7 of the SMB WMA. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Clarify the responsibilities of the City and LACFCD for implementation of the watershed control measures in Table 3-2, "Catch Basin Retrofit Implementation Schedule" of the revised draft WMP to comply with the Santa Monica Bay Nearshore and Offshore Debris TMDL requirements.

2. Revise Table 3-1 of the revised draft WMP to include "Interagency coordination," "Hydromodification Control Plan," and "Sewage system maintenance, overflow, and spill prevention," which are requirements of the LA County MS4 Permit. (See Parts VI.A.2.a.viii, VI.A.4.a.iii, and VI.D.2, among others, regarding "interagency coordination"; Part VI.D.7.c.iv regarding "Hydromodification Control Plan"; and Parts VI.D.9.h.ix and VI.D.10.c-e regarding "sewer system maintenance, overflow, and spill prevention.")
3. In Section 5.2 of the revised draft WMP, Re-Characterization of Water Quality Priorities on page 32, delete the second criterion (second bullet point) regarding the demonstration that MS4 discharges have caused or contributed to an exceedance of receiving water limitations. The second bullet point references the criteria for listing a waterbody on the Clean Water Act section 303(d) list as impaired due to a specific pollutant, which requires a higher threshold than the threshold to determine that a MS4 discharge has caused or contributed to an exceedance of receiving water limitations. A demonstration that a MS4 discharge has caused or contributed to an exceedance of receiving water limitations can be made solely based on the criterion in the first bullet, "Simultaneously collected water samples … exceed the receiving water limitations as sampled in the receiving water and exceed the WQBELs, action levels as defined in Appendix G, or receiving water limits … at the MS4 outfall."
4. Correct the following typographical errors in the revised draft WMP:
    a. In Section 1.2, clarify the area that is addressed by the City's and LACFCD's WMP, since 47 acres excluded from 1056 acres does not equal 976 acres;
    b. Table 2-1, page 7, revise the last footnote to read "Nearshore is defined as the zone bounded by the shoreline <u>and a line 1000 feet from the shoreline</u> or the 30-foot depth contours, whichever is further from the shoreline. The underlined language needs to be add to the footnote;
    c. Section 2.2, page 14, correct the reference to Section <u>VI</u>.C.5(a)ii of the Permit instead of Section IV.C.5(a)ii of the Permit;
    d. Footnote 5, page 27, the percentage referenced in the footnote does not match the percentages referenced in the text;
    e. Correct the table number for the table "Effectiveness Assessment Measures for Various Activities under the Storm Water Management Program" on page 28 to Table 3-3 (currently numbered as Table 3-2); Table 3-2 is located on page 27; and
    f. Section 4.3, page 30, correct the number of catch basins that are City owned and County owned. The current numbers in the revised draft WMP do not add up to 218 catch basins.

The City and LACFCD shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than May 28, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit, the City and LACFCD shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity

to implement permit provisions within the framework of the WMP, Permittees must fully and timely implement all actions per associated schedules set forth in the approved WMP unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii. The Los Angeles Water Board will determine the City's and LACFCD's compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Section 3.1.2 "MCMs and Outcome Levels," which summarizes the Program MCMs and outcome levels that will be achieved; and
- Table 3-2 "Catch Basin Retrofit Implementation Schedule."

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit, the City's and LACFCD's full and timely compliance with all actions and dates for their achievement in their approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachment M of the LA County MS4 Permit. Further, per Part VI.C.2.b of the LA County MS4 Permit, the City's and LACFCD's full compliance with all requirements and dates for their achievement in their approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit for the specific waterbody-pollutant combinations addressed by their approved WMP.

If the City and LACFCD fail to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the City's and LACFCD's Annual Reports and program audits (when conducted), the City and LACFCD shall be subject to the baseline requirements of the LA County MS4 Permit, including but not limited to demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c).

Annual Reporting

The City and LACFCD shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through their Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit. For multi-year efforts, the City and LACFCD shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal/LACFCD approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention/infiltration projects, including LID due to new/redevelopment, green streets, and regional BMPs, the City and LACFCD shall report annually on the volume of stormwater retained in the area covered by the SMB JG7 WMP.

The City and LACFCD shall also include in their Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit. Further, as part of the annual certification concerning a Permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit, the City and LACFCD shall also certify in the Annual Report that each has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6). If a Permittee does not have legal authority to implement an action or milestone at the time the City and LACFCD submits their Annual Report, the Permittee shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The City and LACFCD shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit. As part of this process, the City and LACFCD must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment M of the LA County MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

The City's and LACFCD's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit, the City and LACFCD shall implement adaptive management strategies, including but not limited to:

- Refinement of the Reasonable Assurance Analysis (RAA) based on data specific to the City's area and the LACFCD's infrastructure within JG7 of the SMB WMA that are collected through the City's and LACFCD's Coordinated Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to

the Los Angeles Water Board for review and approval. The City and LACFCD must implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the Permittees' Report(s) of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the Permittees' ROWD.

The Los Angeles Water Board appreciates the participation and cooperation of the City and LACFCD in the implementation of the LA County MS4 Permit. If you have any questions, please contact Rebecca Christmann at Rebecca.Christmann@waterboards.ca.gov or by phone at (213) 576-5734. Alternatively, you may also contact Ivar Ridgeway, Chief Storm Water Permitting Unit, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

cc: Donna Chen, City of Los Angeles
Hubertus Cox, City of Los Angeles
Hamid Tadayon, City of Los Angeles
Angela George, Los Angeles County Flood Control District
Paul Alva, Los Angeles County Flood Control District

April 28, 2015

Ms. Mary Rooney
City of Walnut
Community Services Division
21201 La Puente Road
Walnut, CA 91789

APPROVAL, WITH CONDITIONS, OF THE CITY OF WALNUT'S WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Ms. Rooney:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). Part VI.C of the LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land Development Program. Pursuant to Part VI.C.4.c of the LA County MS4 Permit, the City of Walnut (City) submitted a draft WMP dated June 30, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the City's draft WMP. A separate notice of availability regarding the draft WMPs, including the City's WMP, was directed to State Senators and Assembly Members

within the Coastal Watersheds of Los Angeles County. The Board received two comment letters that had comments applicable to the City's draft WMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper, and the other letter was from the Construction Industry Coalition on Water Quality (CICWQ). On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the City's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 21, 2014, the Los Angeles Water Board sent a letter to the City detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the City's WMP. The letter directed the City to submit a revised draft WMP addressing the Los Angeles Water Board's comments. The City submitted its revised draft WMP on January 21, 2015 for Los Angeles Water Board review and approval. After the City's submittal of the revised draft WMP, Board staff had two teleconferences on April 14 and 15, 2015, and subsequent e-mail exchanges, with City representatives and consultants to discuss the Board's remaining comments and necessary revisions to the January 2015 WMP, including the supporting reasonable assurance analysis (RAA). On April 22, 2015, the City submitted additional revisions to the revised draft WMP for the Los Angeles Water Board review and approval.

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the City's April 22, 2015, revised draft WMP. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Sections 4.11 and 5.1 of the revised draft WMP require more detail on the scope of the program enhancements (beyond the Permit minimum) for the list of non-modeled, non-structural BMPs, including how, when, and to what extent these BMPs will be enhanced during this permit term. Measurable milestones for implementing each one of the non-modeled, non-structural BMPs must be established (e.g., specify a milestone for the installation of Pet Waste Stations listed in Table 5-1 and provide details on the number and location of these Pet Waste Stations).
2. Correct the following typographical errors and omissions in the revised draft WMP :
    a. Correct table and figure referencing (e.g., Section 6.0 incorrectly references Table 4-8 as the City's proposed BMP Implementation Schedule, whereas the reference should be to Table 4-11)

b. Correct references to the effective date of the permit (e.g., Sections 1.0 and 3.2.3 indicate a date of December 28, 2013, while the correct date is December 28, 2012)
c. Correct references to permit limitations (e.g., Section 2.1 and Tables 2-4, 2-5, and 5-6 identify permit limits for Category 2 pollutants as WLAs or WQBELs, however, WQBELs/WLAs are only established for pollutants addressed by a TMDL. All other permit limitations applicable to the City's MS4 discharges are "Receiving Water Limitations.")
d. Delete erroneous statement on page 9, "Each of these sub-watersheds has a different beneficial use assigned for recreational activities. Subsequently the individual sub-watershed areas have different allowable coliform bacteria loadings."
e. Revise Table 5-6, Compliance Schedule as follows: (i) for E. coli, include December 2017 deadline for achieving 8% reduction in fecal coliform load, consistent with Table 4-11; (ii) for other Category 2 pollutants, include an interim milestone within the permit term (i.e., prior to December 28, 2017); and (iii) clarify what the percentages mean for each pollutant (e.g., for selenium, 30% of the San Jose Creek drainage area within the City is meeting the dry-weather WLA).

The City shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions no later than June 12, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit, the City shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, the City must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless of any contingencies indicated in the approved WMP (e.g., funding) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii. The Los Angeles Water Board will determine the City's compliance with the WMP on the basis of the compliance actions and milestones included in the WMP including, but not limited to, the following:

- Section 3.0 Minimum Control Measures
- Table 4-4 Allowable Daily Lead Loads (Computed for the Baseline Wet Day with the 90th Percentile Lead Load)
- Table 4-5 Allowable Bacteria Loads for 90th percentile year
- Table 4-6 Target Load Reductions for the Critical Condition (as a percent of baseline load)
- Section 4.8 Low Impact Development Ordinance
- Section 4.9 Green Streets
- Section 4.10 Regional BMPs

- Section 4.11 Non-Modeled Non-Structural BMPs (Establishes a milestone of an 8% load reduction for fecal coliform, with a range of 5% to 10%).
- Table 4-9 Fecal Coliform Load Reductions as a Percentage of Total Baseline Load for the San Jose Creek Drainage Area for the 90th Percentile Year
- Table 4-10 Fecal Coliform Load Reductions as a Percentage of Total Baseline Load for the Walnut Creek Wash Drainage Area for the 90th Percentile Year
- Table 4-11 Assumed BMP Implementation Schedule
- Figure 4-14 Fecal Coliform Interim and Final Load Reductions for the San Jose Creek Drainage Area
- Figure 4-15 Fecal Coliform Interim and Final Load Reductions for Walnut Creek Wash Drainage Area
- Table 5-1 MCM Program Enhancements
- Table 5-2 Green Streets BMPs
- Table 5-3 City of Walnut Green Streets Interim Implementation Schedule
- Table 5-4 Dry Weather Flow Elimination Program
- Table 5-5 Dry Weather Flow Elimination Program Implementation Schedule
- Table 5-6 Compliance Schedule (for TMDL and 303(d) listed pollutants)

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit, the City's full and timely compliance with all actions and dates for their achievement in its approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachment P of the LA County MS4 Permit. Further, per Part VI.C.2.b of the LA County MS4 Permit, the City's full compliance with all requirements and dates for their achievement in its approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit for the specific waterbody-pollutant combinations addressed by the approved WMP.

If the City fails to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the City's' Annual Reports and program audits (when conducted), the City shall be subject to the baseline requirements of the LA County MS4 Permit, including but not limited to demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c).

Annual Reporting

The City shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit. For multi-year efforts, the City shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of

project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention projects, including LID due to new/redevelopment, green streets, and regional BMPs, the City shall report annually on the volume of stormwater retained in each subwatershed area (i.e., San Jose Creek subwatershed and Walnut Creek Wash subwatershed).

The City shall also include in its Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit. Further, as part of the annual certification concerning a permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit, the City shall also certify in the Annual Report that it has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6). If the City does not have legal authority to implement an action or milestone at the time it submits the Annual Report, the City shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The City shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit. As part of this process, the City must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment P of the LA County MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

As part of the adaptive management process, the City shall also re-evaluate its Category 2 and Category 3 water quality priorities based on data collected through its Integrated Monitoring Program. Where new water quality priorities are identified, the City shall conduct a RAA for the pollutants and identify and incorporated into its WMP appropriate watershed control measures to address them.

The City's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit, the City shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the City's WMP area that are collected through the City's Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;

- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The City must implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the City's Report of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the City's ROWD.

The Los Angeles Water Board appreciates the participation and cooperation of the City in the implementation of the LA County MS4 Permit. If you have any questions, please contact Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

cc: Alicia Jensen, City of Walnut
Robert Wishner, City of Walnut
Melissa Barcelo, City of Walnut
Cody Howing, Assistant Engineer, RKA Consulting Group

California Water Boards

Los Angeles Regional Water Quality Control Board

April 28, 2015

Mr. Frank Senteno, City Engineer
City of El Monte
Department of Public Works
11333 Valley Blvd.
El Monte, CA 91731

APPROVAL, WITH CONDITIONS, OF THE CITY OF EL MONTE'S WATERSHED MANAGEMENT PROGRAM (WMP), PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Mr. Senteno:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board or Board) adopted Order No. R4-2012-0175, *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach* (hereafter, LA County MS4 Permit). Part VI.C of the LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A (Receiving Water Limitations), Part VI.E and Attachments L through R (Total Maximum Daily Load Provisions), and by customizing the control measures in Parts III.A (Prohibitions – Non-Storm Water Discharges) and VI.D (Minimum Control Measures), except the Planning and Land Development Program. Pursuant to Part VI.C.4.c of the LA County MS4 Permit, the City of El Monte (City) submitted a draft WMP dated June 30, 2014, to the Los Angeles Water Board for review.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the City's draft WMP. A separate notice of availability regarding the draft WMPs, including the City's WMP, was directed to State Senators and Assembly Members

within the Coastal Watersheds of Los Angeles County. The Board received two comment letters that had comments applicable to the City's draft WMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper, and the other letter was from the Construction Industry Coalition on Water Quality (CICWQ). On October 9, 2014, the Board held a workshop at its regularly scheduled Board meeting on the draft WMPs. The Board also held a public meeting on April 13, 2015 for permittees and interested persons to discuss the revised draft WMPs with the Executive Officer and staff. During its initial review and its review of the revised draft WMP, the Los Angeles Water Board considered those comments applicable to the City's proposed WMP.

Los Angeles Water Board Review

Concurrently with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft WMPs. On October 22, 2014, the Los Angeles Water Board sent a letter to the City detailing the Board's comments on the draft WMP and identifying the revisions that needed to be addressed prior to the Board's approval of the City's WMP. The letter directed the City to submit a revised draft WMP addressing the Los Angeles Water Board's comments. The City submitted its revised draft WMP on January 22, 2015 for Los Angeles Water Board review and approval. After the City's submittal of the revised draft WMP, Board staff had several telephone and e-mail exchanges with City representatives and consultants to discuss the Board's remaining comments and necessary revisions to the January 22, 2015 revised draft WMP, including the supporting reasonable assurance analysis (RAA). On April 27, 2015, the City submitted additional revisions to the revised draft WMP for Los Angeles Water Board review and approval, which consisted of the following:

1. Figure 1-10 "Existing and Planned Control Measures," which clarifies the location of planned modular wetland systems and tree well filters. As per Figure 1-10, 6 planned modular wetland systems are located along Mountain View Road where the MS4 discharges to Legg Lake.
2. Table 1-9 "LA River Copper" and Figure 1-11 "Scatter Plot for LA River Copper," which show that a 26-98 percent load reduction is required for copper.
3. Table 1-10 "LA River Lead" and Figure 1-12 "Scatter Plot for LA River Lead," which show that a 48-87 percent load reduction is required for lead.
4. Table 1-11 "LA River Zinc" and Figure 1-13 "Scatter Plot and LA River Zinc," which show that a 26-98 percent load reduction is required for zinc.
5. Section 1.9.2.3 LA River Watershed Bacteria TMDL and Table 1-14 "LA River Bacteria," which show that a 99 percent load reduction is required for bacteria.
6. Section 1.9.2.5 San Gabriel River and Impaired Metals and Selenium TMDLs, Table 1-19 "San Gabriel River Lead", and Figure 1-17 "Scatter Plot for San Gabriel River Lead," which show that a 31-67 percent load reduction is required for lead.
7. Section 1.9.2.6 "San Gabriel River, Estuary and Tributaries Indicator Bacteria TMDL (Pending)" and Table 1-20 "San Gabriel River Bacteria," which shows that a 98-99 percent load reduction is required for bacteria.

8. Table 1-21 "TMDL Summary and Action Required," which revises the actions required for Los Angeles River Tributaries Metals TMDL, Los Angeles River Watershed Bacteria TMDL, San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, and San Gabriel River Bacterial TMDL (Pending), stating that BMPs will be installed/implemented to achieve required percent reductions.
9. Text was added to Section 1.8.3 under sub-section Legg Lake stating, "In order to address the required pollutant reductions for Legg Lake, six catch basins along Mountain View Road will be retrofitted with Modular Wetland Systems to remove both trash and nutrients."
10. "Maintenance Guidelines for Modular Wetland System – Linear," which is a reference document for the Appendix outlining the procedures for maintaining the modular wetland systems.
11. "General Use Level Designation for Basic, Enhanced, and Phosphorus Treatment," which is a reference document for the Appendix giving expected percent pollutant load reductions as per laboratory and field testing by the Washington State Department of Ecology.
12. "MWS-Linear 2.0 Stormwater Filtration System," which is a reference document for the Appendix giving the expected percent pollutant load reductions as per the manufacturer.
13. "MASTEP Technology Review," which is a reference document for the Appendix giving the expected pollutant load reductions as per a study by the University of Massachusetts at Amherst.
14. Text was added to Section 1.9.1 under sub-section Calibration stating, "There is limited or insufficient storm flow and water quality data currently available near El Monte to facilitate additional calibration of modeling parameters. This lack of data was confirmed by Los Angeles County Department of Public Works employees that were involved in the development of the WMMS model. As the City collects monitoring data from both outfall and receiving water monitoring, the collected data will be used to further calibrate the model as part of the Adaptive Management Process."

Approval of WMP, with Conditions

The Los Angeles Water Board hereby approves, subject to the following conditions, the City's January 22, 2015 revised draft WMP, as supplemented by the April 27, 2015 additional revisions noted above. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Remove selenium from Table 1-4 ("WBPCs with TMDLs (Category 1))" of the revised draft WMP. The City's MS4 discharges are not subject to the dry-weather selenium waste load allocations (WLAs) in the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL (Attachment P of the LA County MS4 Permit) assigned to discharges to the San Jose Reach 1 and 2.
2. Remove Trash for Legg Lake from Table 1-5 of the revised draft WMP ("WBPCs on 2010 303(d) list (Category 2))". Trash for Legg Lake is a Category 1 pollutant already addressed in Table 1-4.

3. Ammonia, odor, and pH for Legg Lake and pH for Los Angeles River are Category 1 pollutants, since they are being addressed through the Legg Lake Nutrients TMDL and Los Angeles River Nitrogen Compounds and Related Effects TMDL. Move these Category 1 pollutants from Table 1-5 to Table 1-4 of the revised draft WMP.
4. Although Sections 1.2.1, 1.2.2, and 1.2.3 of the revised draft WMP provide a summary of recent data on pollutant exceedances, include further discussion in Section 1.7.3 on each of the Category 3 pollutants listed in Table 1-6 explaining how monitoring data sources show exceedances and possible sources of those exceedances. Additionally, clarify or remove the entry for indicator bacteria in the San Gabriel River in Table 1-6, since indicator bacteria is identified as a Category 2 pollutant for San Gabriel River (Reach 3) in Table 1-5.
5. Add applicable Receiving Water Limitations where left blank in Tables 1-5 and 1-6 of the revised draft WMP.
6. Specify that the effluent limitations applicable to the City in Table 1-12 of the revised draft WMP are those for the Los Angeles Tributaries.
7. Use the suggested BMP performance parameters given in the RAA Guidelines in Table 4-2 of the revised draft WMP (p. 18) to provide the estimated pollutant load reduction for the proposed BMPs. Include demonstration that the proposed BMPs will achieve pollutant load reductions needed for those pollutants addressed in the RAA (as shown in Tables 1-9, 1-10, 1-11, 1-14, 1-19, and 1-20 provided as a supplement to the revised draft WMP) consistent with interim milestones within this permit term and the next permit term (i.e., through December 2022).
8. Revise Table 1-25 of the revised draft WMP, TMDL Milestones for Los Angeles River, for Los Angeles River Watershed Bacteria TMDL by separating the deadlines for wet and dry as is done for other pollutants in the table. March 23, 2037 is the final deadline for compliance in wet weather. Dry weather deadlines are per the applicable schedule in Table O-1 of Attachment O in the LA County MS4 Permit, as follows.
    a. First Phase actions and deadlines:
        i. "Submit a Load Reduction Strategy (LRS) for Segment B tributaries (*or submit an alternative compliance plan*) by March 23, 2016;
        ii. "Complete Implementation of LRS" by September 23, 2020;
        iii. "Achieve interim (or final) water quality-based effluent limitations and submit report to Regional Water Board" by September 23, 2023;
    b. Second Phase actions and deadlines:
        i. "Submit a New LRS" by September 23, 2024;
        ii. "Complete Implementation of LRS" by March 23, 2028;
        iii. "Achieve final water quality-based effluent limitations or demonstrate that non-compliance is due to upstream contributions and submit report to Regional Water Board" by March 23, 2030.
9. Revise Table 1-26 of the revised draft WMP, TMDL Milestones for San Gabriel River, to include interim milestones consistent with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL Implementation Plan adopted by the Los Angeles Water Board through Resolution No. R13-004. These milestones include: a 10% reduction in the difference between the current loadings and the wet-weather WLAs

at MS4 outfalls (or a demonstration that 10% of the total drainage area to the San Gabriel River within the City is effectively meeting the wet-weather WLAs) by September 30, 2017; a 35% reduction by September 30, 2020; a 65% reduction by September 30, 2023; and a 100% reduction by September 30, 2026.

10. Review and revise the entire revised draft WMP for correct table and figure labeling and referencing.

The City shall submit a final WMP to the Los Angeles Water Board that satisfies all of the above conditions, and also includes all of the additional revisions submitted on April 27, 2015 as listed under "Los Angeles Water Board Review" above, no later than June 12, 2015.

Determination of Compliance with WMP

Pursuant to Part VI.C.6 of the LA County MS4 Permit, the City shall begin implementation of the approved WMP immediately. To continue to be afforded the opportunity to implement permit provisions within the framework of the WMP, the City must fully and timely implement all actions per associated schedules set forth in the approved WMP regardless of any contingencies indicated in the approved WMP (e.g., funding) unless a modification to the approved WMP, including any extension of deadlines where allowed, is approved by the Los Angeles Water Board pursuant to Part VI.C.6.a or Part VI.C.8.a.ii-iii. The Los Angeles Water Board will determine the City's' compliance with the WMP on the basis of the compliance actions and milestones included in the WMP, including, but not limited to, the following:

- Section 1.8 "Selection of Watershed Control Measures"
- Section 1.8.1 "Minimum Control Measures (MCMs)"
- Section 1.8.2 "Non-Storm Water Discharge Control Measures"
- Section 1.8.3 "TMDL Control Measures"
- Section 1.8.4 "Existing and Planned Structural Control Measures," including Figure 10 (as revised on April 27, 2015)
- Table 1-9 "LA River Copper" (as revised on April 27, 2015)
- Table 1-10 "LA River Lead" (as revised on April 27, 2015)
- Table 1-11 "LA River Zinc" (as revised on April 27, 2015)
- Table 1-14 "LA River Bacteria" (as revised on April 27, 2015)
- Table 1-15 "Legg Lake Modeled Nutrients Reduction Required"
- Table 1-19 "San Gabriel River Lead" (as revised on April 27, 2015)
- Table 1-20 "San Gabriel River Bacteria" (as revised on April 27, 2015)
- Table 1-21 "TMDL Summary and Action Required" (as revised on April 27, 2015)
- Table 1-23 "Los Angeles River Trash TMDL BMP Implementation Schedule"
- Table 1-24 "Legg Lake Trash and Nutrients TMDL BMP Implementation Schedule"
- Table 1-25 "TMDL Milestones for Los Angeles River"
- Table 1-26 "TMDL Milestones for San Gabriel River"

Pursuant to Parts VI.C.3 and VI.E.2.d.i.(4)(a) of the LA County MS4 Permit, the City's full and timely compliance with all actions and dates for their achievement in its approved WMP shall constitute compliance with permit provisions pertaining to applicable WQBELs/WLAs in Part VI.E and Attachment O and P of the LA County MS4 Permit. Further, per Part VI.C.2.b of the LA County MS4 Permit, the City's' full compliance with all requirements and dates for their achievement in its approved WMP constitutes compliance with the receiving water limitations provisions of Part V.A of the LA County MS4 Permit for the specific waterbody-pollutant combinations addressed by the approved WMP.

If the City fails to meet any requirement or date for its achievement in the approved WMP, which will be demonstrated through the City's' Annual Reports and program audits (when conducted), the City shall be subject to the baseline requirements of the LA County MS4 Permit, including but not limited to demonstrating compliance with applicable receiving water limitations and TMDL-based WQBELs/WLAs through outfall and receiving water monitoring. See Parts VI.C.2.c and VI.E.2.d.i.(4)(c).

Annual Reporting

The City shall report on achievement of actions and milestones within the reporting year, as well as progress towards future milestones related to multi-year projects, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit. For multi-year efforts, the City shall include the status of the project, which includes the status with regard to standard project implementation steps. These steps include, but are not limited to, adopted or potential future changes to municipal ordinances to implement the project, site selection, environmental review and permitting, project design, acquisition of grant or loan funding and/or municipal approval of project funding, contractor selection, construction schedule, start-up, and effectiveness evaluation (once operational), where applicable. For all stormwater retention projects, LID due to new/redevelopment, and green streets, the City shall report annually on the volume of stormwater retained in each subwatershed area (i.e., Legg Lake subwatershed, Rio Hondo subwatershed, and San Gabriel River subwatershed).

The City shall also include in its Annual Report the source(s) of funds used during the reporting year, and those funds proposed for the coming year, to meet necessary expenditures related to implementation of the actions identified in its WMP per Part VI.A.3 of the LA County MS4 Permit. Further, as part of the annual certification concerning a permittee's legal authority required by Part VI.A.2.b of the LA County MS4 Permit, the City shall also certify in the Annual Report that it has the necessary legal authority to implement each of the actions and milestones in the approved WMP as required by Part VI.C.5.b.iv.(6). If the City does not have legal authority to implement an action or milestone at the time it submits the Annual Report, the City shall propose a schedule to establish and maintain such legal authority.

Adaptive Management

The City shall conduct a comprehensive evaluation of its WMP no later than April 28, 2017, and subsequently, every two years thereafter pursuant to the adaptive management process set forth in Part VI.C.8 of the Los Angeles County MS4 Permit. As part of this process, the City must evaluate progress toward achieving:

- Applicable WQBELs/WLAs in Attachment O and P of the LA County MS4 Permit according to the milestones set forth in its WMP;
- Improved water quality in MS4 discharges and receiving waters;
- Stormwater retention milestones; and
- Multi-year efforts that were not completed in the current year and will continue into the subsequent year(s), among other requirements.

The City's evaluation of the above shall be based on both progress implementing actions in the WMP and an evaluation of outfall-based monitoring data and receiving water data. Per Attachment E, Part XVIII.6 of the LA County MS4 Permit, the City shall implement adaptive management strategies, including but not limited to:

- Refinement and recalibration of the Reasonable Assurance Analysis (RAA) based on data specific to the City's WMP area that are collected through the City's Integrated Monitoring Program and other data as appropriate;
- Identifying the most effective control measures, why they are the most effective, and how other control measures can be optimized based on this understanding;
- Identify the least effective control measures, why they are ineffective, and how the control measures can be modified or replaced to be more effective;
- Identify significant changes to control measures during the prior year(s) and the rationale for the changes; and
- Describe all significant changes to control measures anticipated to be made in the next year(s) and the rationale for each change.

As part of the adaptive management process, any modifications to the WMP, including any requests for extension of deadlines not associated with TMDL provisions, must be submitted to the Los Angeles Water Board for review and approval. The City must implement any modifications to the WMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the City's Report of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the WMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the City's ROWD.

The Los Angeles Water Board appreciates the participation and cooperation of the City in the implementation of the LA County MS4 Permit. If you have any questions, please contact Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

cc: Jesus Gomez, Assistant City Manager
Edmond Suher, Senior Project Engineer, CASC Engineering and Consulting

Exhibit C

Revised Watershed Management Programs

Please find below hyperlinks to the following revised WMPs:

1. East San Gabriel Valley Watershed Management Area
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/san_gabriel/east_san_gabriel/RevisedESGV%20WMP_012815.pdf
2. Alamitos Bay/Los Cerritos Channel Watershed Management Area
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/los_cerritos_channel/alamitos_bay/2015-01-27_AB-LCC_WMP_Resubmittal.pdf
3. Los Cerritos Channel Watershed*
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/los_cerritos_channel/LosCerritosChannel_WMP_Revised1.pdf
4. Lower Los Angeles River Watershed*
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/los_angeles/lower_losangeles/LowerLAR_WMP_DraftRevised1.pdf
5. Lower San Gabriel River Watershed*
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/san_gabriel/lower_sangabriel/LowerSGR_WMP_DraftRevised1.pdf
6. Los Angeles River Upper Reach 2 Watershed Management Area
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/los_angeles/upper_reach2/15-01-27LARUR2WMARevWMP.pdf
7. Santa Monica Bay Watershed Jurisdictional Group 7 Area within the City of Los Angeles
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/santa_monica/santamonicaj7/SMB%20JG7%20Revised%20WMP%20-%20012715.pdf
8. City of Walnut
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/walnut/WatershedManagementPlanREV42215.pdf
9. City of El Monte
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/el_monte/ElMonteRevisedDraftWatershedManagementProgram1-22-15.pdf

All nine revised WMPs can also be found on the Regional Board's website at:
http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/index.shtml

Exhibit D

Lower Los Angeles River

Permit Citation	Staff Comments from October 30, 2014	Analysis of Revised WMP Responsiveness to Staff Comments	Conditional Approval Requirements
Part VI.C.5.b.iv.(4)(b)-(c)	"The MS4 Permit requires that the WMP provide specificity with regard to structural and non-structural BMPs, including the number, type, and location(s), etc. adequate to assess compliance. In a number of cases, additional specificity....is needed....[T]here should at least be more specificity on actions within the current and next permit terms."	The response, and other statements throughout the document, demonstrate that no commitments to "specificity or actions" or associated timelines are made.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(4)(b)-(c)	"…the WMP should at least commit to the construction of the necessary number of projects to ensure compliance with permit requirements per applicable compliance schedules."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The RAA should clarify that sufficient sites were identified so that the remaining necessary BMP volume can be achieved by those sites that were not 'excluded for privacy.'"	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The RAA identifies zinc as the limiting pollutant and notes that this pollutant will drive reductions of other pollutants. If the Group believes that that [sic] this approach demonstrates that activities and control measures will achieve applicable receiving water limitations, it should explicitly state and justify this for each category 1,2, and 3 pollutant."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"We note that modeling was not conducted for organics (DDT, PCBs, and PAHs). It is not clear why these pollutants were not modeled or why previous modeling of these pollutants could not be used….An explanation for the lack of modeling is needed."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"…the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL was [sic] appears to be completely omitted from the draft WMP."	No change was made in this section of the document and there is no inclusion of analysis of pollutant controls, as requested.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"Pursuant to Section VI.C.5.a., the WMP should be revised to include an evaluation of existing water quality conditions, classify them into categories, identify potential sources, and identify strategies, control measures, and BMPs as required in the permit for San Pedro Bay unless MS4 discharges from the LLAR WMA directly to San Pedro Bay are being addressed in a separate WMP."	There is only one reference in the document to San Pedro Bay, and it remains unchanged from the 2014 version of the WMP.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(4)(c)	"The draft WMP appears to rely mostly on the phase-out of copper in automotive brake pads…to achieve the necessary copper load reductions….[O]ther structural and non-structural BMPs may still be needed to reduce Cu loads sufficiently to achieve compliance deadlines fro interim and/or final WQBELs."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)(c)	"For waterbody-pollutant combinations not addressed by TMDLs, the MS4 Permit requires that the plan demonstrate using the reasonable assurance analysis (RAA) that the activities and control measures to be implemented will achieve applicable receiving water limitations as soon as possible....[The RAA] does not address the question of whether compliance with limitations for pollutants not addressed by TMDLs could be achieved in a shorter time frame."	No response identified.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The WMP assumes a 10% pollutant reduction from new non-structural controls….additional support for this assumption should be provided, or as part of the adaptive management process, the Permittees should commit to evaluate this assumption during program implementation and develop alternate controls if it becomes apparent that the assumption is not supported."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.

Part VI.C.5.b.iv.(5)	"…the predicted baseline concentrations and loads for all modeled pollutants of concern, including TSS, should be presented in summary tables for wet weather conditions."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The report presents the existing runoff volumes, required volume reductions and proposed volume reductions from BMP scenarios to achieve the 85th percentile, 24-hour volume retention standard for each major watershed area….The same information...also needs to be presented for each modeled subbasin...Additionally, more explanation is needed as to what constitutes the 'incremental' and 'cumulative' critical year storm volumes in table 9-4 through 9-7 and how these values were derived from previous tables. "The report needs to present the same information, if available, for non-stormwater runoff."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.

Lower San Gabriel River

Permit Citation	Staff Comments from October 30, 2014	Analysis of Revised WMP Response to Staff Comments	Conditional Approval Requirements
Part VI.C.5.b.iv.(4)(b)-(d)	"…the WMP should at least commit to the construction of the necessary number of projects to ensure compliance with permit requirements per applicable compliance schedules."	The response implies no commitment beyond good intentions and a willingness to track progress (or its lack thereof) through the permit cycle.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(4)(d)	"The MS4 Permit requires that the WMP provide specificity with regard to structural and non-structural BMPs, including the number, type, and location(s), etc. adequate to assess compliance. In a number of cases, additional specificity....is needed....there should at least be more specificity on actions within the current and next permit terms to ensure that the following interim requirements are met..."	The response, and other statements throughout the document, make it clear that no commitments to "specificity or actions" or associated timelines are made. There is also no cross-walk between scheduled completion dates and interim compliance deadlines. Given the vague nature of nearly all of the "milestones," it's not surprising that there is no direct linkage between actions, meeting interim requirements, and the schedule.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The RAA identifies zinc as the limiting pollutant and notes that this pollutant will drive reductions of other pollutants. If the Group believes that that [sic] this approach demonstrates that activities and control measures will achieve applicable receiving water limitations, it should explicitly state and justify this for each category 1,2, and 3 pollutant."	The draft WMP does not appear to have been modified in response to this comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"We note that modeling was not conducted for organics (DDT, PCBs, and PAHs). It is not clear why these pollutants were not modeled or why previous modeling of these pollutants could not be used….An explanation for the lack of modeling is needed."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(4)(c)	"The draft WMP appears to rely mostly on the phase-out of copper in automotive brake pads…to achieve the necessary copper load reductions….[O]ther structural and non-structural BMPs may still be needed to reduce Cu loads sufficiently to achieve compliance deadlines fro interim and/or final WQBELs."	No change was made in the document in response to the comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)(c)	"For waterbody-pollutant combinations not addressed by TMDLs, the MS4 Permit requires that the plan demonstrate using the reasonable assurance analysis (RAA) that the activities and control measures to be implemented will achieve applicable receiving water limitations as soon as possible....[The RAA] does not address the question of whether compliance with limitations for pollutants not addressed by TMDLs could be achieved in a shorter time frame."	There is no response to this comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.

Part VI.C.5.b.iv.(5)	"The draft assumes a 10% pollutant reduction from new non-structural controls….additional support for this assumption should be provided, particularly since the group appears to be relying almost entirely on these controls for near-term pollutant reductions to achieve early interim milestones/deadlines."	There was no substantial advance over what was previously included, though the issue is acknowledged explicitly.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"Based on the results of the hydrology calibration shown in Table 4-3, the error difference between modeled flow volumes and observed data is 19%....The higher error percentage could be due to the exclusion of contributions of flow volume from upstream. For calibration purposes, upstream volume should be included....Once model calibration has been completed, the upstream flow volume can then be excluded...."	Between the 2014 and 2015 RAA's, the % error improves from -19.0% to -3.31%. There is no text change to explain this difference, nor any difference in the graphed monthly hydrographs for observed and modeled flows.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"…the predicted baseline concentrations and loads for all modeled pollutants of concern, including TSS, should be presented in summary tables for wet weather conditions."	No change in the RAA to address this comment.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The report presents the existing runoff volumes, required volume reductions and proposed volume reductions from BMP scenarios to achieve the 85th percentile, 24-hour volume retention standard for each major watershed area….The same information...also needs to be presented for each modeled subbasin...Additionally, more explanation is needed as to what constitutes the 'incremental' and 'cumulative' critical year storm volumes in table 9-6 and 9-7 and how these values were derived from previous tables. "The report needs to present the same information, if available, for non-stormwater runoff."	The request for a series of tables by subbasin has not been met; an added sentence defines the terms used but not how the values were derived from previous tables. No new information addressing comment about non-stormwater runoff.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.

Los Angeles River Upper Reach 2

Permit Citation	Staff Comments from October 30, 2014	Analysis of Revised WMP Responsiveness to Staff Comments	Conditional Approval Requirements
Part VI.C.5.b.iv.(5)	"The WMP did not model and pollutants in Categories 2 and 3. These pollutants or surrogates need to be included in the RAA, or supported justification for the use of the proposed limiting pollutants as surrogates for each Category 2 and Category 3 waterbody-pollutant combination."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.a.iii	"…the WMP should utilize General Industrial Storm Water Permittee monitoring results…to assess and potentially refine estimates of pollutant loading from the identified "non-MS4" areas.	The recommended action was not done.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.a.iii	"The draft WMP should consider existing TMDL modeling data, where available, when refining the source assessment.	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.a.iii	"A process and schedule for developing the required spatial information on catchment areas to major outfalls should be proposed, if this information does not already exist."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b Part VI.C.5.b.iv.(5)	"The draft WMP does not clearly specify a strategy to comply with the interim WQBELs for the LA River metals TMDL….Further discussion of current compliance with the LA River nitrogen compounds TMDL, for which there is a final compliance deadline of 2004, is also needed..."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b	"…the specific LID street projects and their locations are not identified. The draft WMP should provide as much specificity as feasible in describing the potential locations for LID streets. Additionally, the permittees that would be responsible for implementing LID street projeccts should be specified."	Section 4.3.3.2 identifies on proposed LID street BMP in Vernon and one completed and one potential LID street BMP in Commerce. It went on to give some budgetary rationalizations. Mere mention of three LID street BMPs, only one finished or with a solid commitment, is unresponsive.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b	"The WMP assumes a significant reduction in copper based on the phase-out of copper in automotive brake pads…to achieve the necessary copper load reductions….[A]dditional structural BMPs may still be needed to reduce copper loads prior to entering receiving waters and eliminate copper exceedances of RWLs."	Section 3.3.2 reasons that the phase-out is ahead of schedule and that other copper reductions will be afforded by source controls for zinc. Section 4.3.2.2 also discusses the issue but with nothing beyond the content of the draft WMP. The WMP shows no analysis of other sources and their magnitudes, how the accelerated phase-out might affect copper concentrations and loadings, or how source controls for zinc will affect copper. Sources of zinc and copper are not necessarily coincident, and frequently are not.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"Table 1-5 should be updated….The concentration-based WQBELs for metals on page 78 are incorrect…."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The differences between baseline concentrations/loads and allowable concentrations/loads should be presented in a time series…and then as a summary of 90th percentile of the differences between pollutant concentrations/loads and allowable concentrations/loads for wet weather periods, in units consistent with the applicable WQBELs and Receiving Water Limitations..."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"…a detailed explanation should be provided of the calculations used to derive the target load reductions."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"Model output should also be provided for phased BMP implementation to demonstrate that interim WQBELs for metals and bacteria will be met."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The ID number for each of the 50 subwatersheds from the model input file should be provided and be shown in the simulation domain to present the geographic relationship of subwatersheds within the watershed area that are simulated in the LSPC model."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.

Los Angeles River Upper Reach 2

Part VI.C.5.b.iv.(5)	"The flow, runoff volume and water quality….time series output at the watershed outlet as well as for each modeled subbasin should be provided using the 90th percentile critical conditions….to estimate the baseline condition. In addition, per RAA Guidelines, the model output should include stormwater runoff volume and pollutant concentration/load at the outlet and for each modeled subbasin for each BMP scenario as well..."	There is no evidence that this comment was considered or addressed.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"The identification of the 90th percentile years in Table 4-2 needs to be supported by presenting historical hydrological data to demonstrate the selected critical period will capture the variability of rainfall and storm sizes/conditions."	The presentation does not demonstrate that the choice of critical years given in Table 4-2 is correct. The analysis and graphing are not for precipitation frequency, as requested by the comment, but flow rate frequency. The addition to the WMP is thus unresponsive.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.
Part VI.C.5.b.iv.(5)	"Model simulation for copper, lead, zinc, nitrogen, and bacteria under the dry weather condition was not included in the Report and needs to be addressed."	Two paragraphs were added to the WMP in section 4.3 reasoning that the approved models are not applicable to dry weather. Yet the consultant who prepared the Lower San Gabriel River RAA developed methodology to simulate dry weather conditions and to develop dry-weather pollutant reduction targets.	No Requirement to address Oct. 30, 2014 Staff comment or to comply with Permit term.