

EXHIBIT A



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

August 13, 2015

Permittees of the Los Angeles River Upper Reach 2 Watershed Management Group¹

FINAL APPROVED LOS ANGELES RIVER UPPER REACH 2 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) 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 MS4* (hereafter, LA County MS4 Permit). 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), 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.

On April 28, 2015, on behalf of the Los Angeles Water Board, I approved, with conditions, the Los Angeles River Upper Reach 2 (LAR UR2) Group's WMP. My approval letter directed the LAR UR2 Group to submit a final WMP that satisfies all the conditions listed in the letter no later than June 12, 2015. On June 12, 2015, the LAR UR2 Group submitted its final WMP, as directed.

After review of the final LAR UR2 Group's WMP submitted on June 12, 2015, I have determined that the ULAR2 Group's WMP satisfies all of the conditions identified in my April 28, 2015

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

approval letter. The WMP dated June 12, 2015 constitutes the final approved WMP for the LAR UR2 Group.

The Los Angeles Water Board appreciates the participation and cooperation of the LAR UR2 Group 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, P.E.
Executive Officer

Enclosure: Distribution List

LOS ANGELES RIVER UPPER REACH 2

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Los Angeles Regional Water Quality Control Board

July 21, 2015

Permittees of the Lower San Gabriel River Watershed Management Group¹

FINAL APPROVED LOWER SAN GABRIEL RIVER 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 San Gabriel River Watershed Management Group:

On November 8, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water 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 MS4* (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). The LA County MS4 Permit and 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), 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 Program².

On April 28, 2015, on behalf of the Los Angeles Water Board, I approved, with conditions, the Lower San Gabriel River (LSGR) Group's WMP. My approval letter directed the LSGR Group to

¹ Permittees of the Lower San Gabriel River Watershed 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.

² The cited permit sections are from the LA County MS4 Permit. 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).

July 21, 2015

submit a final WMP that satisfies all the conditions listed in the letter no later than June 12, 2015. On June 12, 2015 the LSGR Group submitted its final WMP, as directed.

After review of the final LSGR WMP submitted on June 12, 2015, I have determined that the LSGR Group's WMP satisfies all of the conditions identified in my April 28, 2015 approval letter. The WMP dated June 12, 2015 hereby constitutes the final approved WMP for the LSGR Group.

The Los Angeles Water Board appreciates the participation and cooperation of the LSGR Group in the implementation of the LA County MS4 Permit and the Long Beach 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, P.E.
Executive Officer

Los Angeles Regional Water Quality Control Board

July 21, 2015

Permittees of the Lower Los Angeles River Watershed Management Group¹

FINAL APPROVED LOWER LOS ANGELES RIVER 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) 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 MS4* (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). The LA County MS4 Permit and 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), 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 Program².

On April 28, 2015, on behalf of the Los Angeles Water Board, I approved, with conditions, the Lower Los Angeles River (LLAR) Group's WMP. My approval letter directed the LLAR Group to

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.

² The cited permit sections are from the LA County MS4 Permit. 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).

July 21, 2015

submit a final WMP that satisfies all the conditions listed in the letter no later than June 12, 2015. On June 12, 2015 the LLAR Group submitted its final WMP, as directed.

After review of the final LLAR WMP submitted on June 12, 2015, I have determined that the LLAR Group's WMP satisfies all of the conditions identified in my April 28, 2015 approval letter. The WMP dated June 12, 2015 hereby constitutes the final approved WMP for the LLAR Group.

The Los Angeles Water Board appreciates the participation and cooperation of the LLAR Group in the implementation of the LA County MS4 Permit and the Long Beach 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, P.E.
Executive Officer

EXHIBIT B

Los Angeles River Upper Reach 2

Index LSGR	Index LLAR	INDEX LAR UR2	Permit Citation	Board Staff Comments from October 27, 2014	Analysis of Revised WMP (January 27, 2015) in response to Board Comments	Conditional Approval Requirements (April 28, 2015)	Analysis of Final WMP (June 12, 2015)	In August 3, 2015 LAR UR2 Response Letter	Analysis of Response Letter statements	Staff Response (August 2015)	Analysis of Staff Response
---	---	1	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 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.	The recommended action was not done, with the reasoning (Revised WMP section 2.4, page 33)— "... Category 3 pollutants overlap significantly with Category 1 or 2 pollutants and in some cases, such as fecal coliform and E. coli, or total nitrogen and nitrate, they are essentially the same pollutant. Carrying out separate analyses for these overlapping WBPCs risks producing an RAA with conflicting implementation priorities, based on inaccurate assumptions regarding the independence of the variables and an [sic] misapplied implementation effort on duplicative parameters." However, the Category 3 pollutants total phosphorus, pH, total suspended solids, chromium, and nickel are not represented on the Category 1 or 2 lists. It is untrue that total nitrogen (TN) and Category 1 inorganic nitrogen compounds are "the same pollutant". This mandatory requirement ("The Group must identify and address Category 3 waterbody-Pollutant Combinations") was not met.	No Requirement to address October 27, 2014 Board comment.	No change from Revised WMP.	"The assertion was discussed with Regional Board Staff and a consensus formed that, for RAA purposes, Category 2 and 3 pollutants were suitably well represented by Category 1 pollutants...Sections 2.4 and 4.2.3 of the Final WMP were revised to better convey that Category 2 and 3 pollutants were sufficiently similar to Category 1 pollutants, to satisfy RAA requirements. Monitoring will develop additional data for the AMP."	There is no change in wording between the Revised and Final WMP's, Section 2.4, contrary to this statement. Section 4.2 was substantially rewritten between Revised and Final WMP's, However, there is no reference in this section to Category 2 or Category 3 pollutants, so it is unclear to what this statement is referring. Every version of the WMP (Draft, Revised, Final) includes the same non-responsive text in Section 2.2 and questioned in the Board's initial comments from October 2014: "Category 3 pollutants were not identified for LAR UR2 WMA because all available water quality data was obtained downstream of LAR UR2 WMA, therefore its applicability is unknown."	See #9	
---	---	2	"...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. 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.	The recommended action was not done, under the following reasoning (Revised WMP section 2.3, page 30)— "...the LAR UR2 WMA Permittees were asked to provide summary data resulting from past industrial and commercial inspections...[which] did not provide useful information ...Monitoring data, from non-MS4 Permittees in the LAR UR2 WMA, were also reviewed, however of 161 General Industrial Permittees within the WMA, only 35 were found to have submitted data ..." "...did not meet the RAA Guideline criteria for being sustentative [sic] and defensible... TMDL pollutant source assessments and models reviewed during preparation of the WMP were inconclusive and overly broad upon which to take actionable source determinations or source control efforts." Despite data quality issues, there are some data from the region, and some of those are reliable; from the literature of the field; and from permitted industries elsewhere. Using the best available data for this purpose would not be inconsistent with other modeling and analysis strategies pursued in the WMP; e.g., almost all receiving water data relied upon in this WMP are outside the reach in question.	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...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...enforcement is not a change from the 2001 permit.	The original October 27 comment remains inadequately addressed. In response to the April 28 comment, the wording in what was Section 4.3.2.3 of the Revised WMP (now section 4.4.4 of the Final WMP) states "There are many substantial changes between the 2001 to 2012 MS4 Permits which can reasonably be assumed to result in substantially reduced pollutant generation, increased source controls, and significant watershed control measure induced load reductions." Presumably this is in response to the observation that "enforcement is not a change from the 2001 permit," but in fact its meaning is the opposite from what the Board comments intended (i.e., emphasizing changes from the 2001 permit instead of acknowledging continuity of regulations). Nowhere in the Final WMP is "enforcement" referenced with respect to Industrial Storm Water Permits or permittees.	"WMP section 2.3 was modified to reiterate our prior findings and board staff acknowledgement that: 1) the majority of the SMARTS data did not meet the "defensible" standard; 2) there are insufficient land use categories in the current model to accommodate the many Industrial General Permittees; and 3) including these discharges could distort BMP designs.	Response is limited to only one of the several issues raised by the Board's initial and follow-up comments, namely the use of the SMARTS database. Other elements remain unaddressed.	"Section 2 of the revised and final WMP was amended to include details on the Group's analysis of non-MS4 industrial stormwater data. The following discussion was included on page 30 both the revised WMP and final WMP..."	Response is limited to only one of the several issues raised by the Board's initial and follow-up comments, namely the use of the SMARTS database. Other elements remain unaddressed.	
---	---	3	Part VI.C.5.a.iii ...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.	Section 2.3 of the Revised WMP had additional text that asserts "As apparent from the following subsections, TMDL pollutant source assessments and models reviewed during preparation of the WMP were inconclusive and overly broad upon which to take actionable source determinations or source control efforts", and that "Current models are inadequate for distinguishing copper loads from a residential area adjacent to a freeway with those from a rural area." Although the "following subsections" are referenced, almost no text has changed in them between the Draft and Revised WMP, and so it is unclear what is being referenced.	No additional requirement to address October 27, 2014 Board comment.	No further changes.	"WMP section 2.3 was expanded to explicitly state that prior findings from TMDL source assessments and models were inconclusive and overly broad for initiating actionable source assessments. One example being oversight of the impact of SB-346 on copper in the Los Angeles River Metals TMDL."	The referenced "expansion" was made in the Revised WMP and was unchanged in the Final WMP. However, the Lower LAR WMP made direct use of the TMDL modeling results and apparently found them quite useful (that plan's Section 2.3.4). Why such a difference in value was determined by the same Board staff on the same river is unclear.	"The Group and Board staff discussed the existing TMDL modeling and found it too general to refine the Group's source assessment for its watershed area. The Group did, however, add detail to the discussion of TMDL source assessments in Section 2.3 of its Revised WMP, including consideration of recent TMDL monitoring data. This is appropriate as the comment was for the Group to consider existing TMDL modeling data."	The Board is technically correct, the use of these data were "considered" (and obviously rejected). Acceptance of such <i>pro forma</i> response, however, particularly in light of the LLAR use of these data, is nonetheless surprising.	

Los Angeles River Upper Reach 2

Index LSGR	Index LLAR	INDEX LAR UR2	Permit Citation	Board Staff Comments from October 27, 2014	Analysis of Revised WMP (January 27, 2015) in response to Board Comments	Conditional Approval Requirements (April 28, 2015)	Analysis of Final WMP (June 12, 2015)	In August 3, 2015 LAR UR2 Response Letter	Analysis of Response Letter statements	Staff Response (August 2015)	Analysis of Staff Response
--	--	4		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...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.	It is unclear whether this comment was considered or addressed. Table 3.5 ("Estimate Runoff Volume and Regional BMP Area by City and Catchment") appears unchanged in both the Draft and Revised WMP without change, implying that more was expected under the Board comment.	No additional requirement to address October 27, 2014 Board comment.	No further changes.	"Board staff were directed to the CIMP which demonstrated that seven outfalls conveyed about 79% of the LAR UR2 WMA tributary area. Definition of remaining catchments would occur through the IC/ID and NSW Outfall Prioritization Permit programs."	It is unclear if a schedule is associated with either of these programs.	"The Group clarified that some of the required spatial information was presented in the Coordinate Integrated Monitoring Program (CIMP). For the remainder, the Group committed to developing it as it implements its illicit connection/illicit discharge activities, nonstormwater screening and prioritization, and source identification."	It is unclear where this "commitment" resides, and if it is binding.
--	5	5	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 a category (highest priority), since some compliance deadlines have already passed.	New text was added to introduce Table 2-7 (Revised WMP, p. 33): "...Category 3 pollutants overlap significantly with Category 1 or 2 pollutants and in some cases, such as fecal coliform and E. coli, or total nitrogen and nitrate, they are essentially the same pollutant. Carrying out separate analyses for these overlapping WBPCs risks producing an RAA with conflicting implementation priorities, based on inaccurate assumptions regarding the independence of the variables and an [sic] misapplied implementation effort on duplicative parameters." However, the Category 3 pollutants total phosphorus, pH, total suspended solids, chromium, and nickel are not represented on the Category 1 or 2 lists. It is untrue that total nitrogen (TN) and Category 1 inorganic nitrogen compounds are "the same pollutant" (TN consists of, in addition, various organic nitrogen compounds). This statement is simply incorrect, and not responsive.	No additional requirement to address October 27, 2014 Board comment.	Except for correcting the typographic error on the bottom of page 33 introduced into the Revised WMP ("...an misapplied..."), Table 2-7 and its explanatory text are unchanged in the Final WMP. This comment was not addressed.				
--	--	6		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.	Section 5.1 of the Revised WMP has added a single sentence in response to this comment: "The Los Angeles River Trash TMDL will be implemented by October 1, 2015, in order to meet the annual compliance assessment date on September 30, 2016." The Revised WMP also maintains from the Draft WMP the caveat, "The WMP, including the schedule aspect, will be updated through the adaptive management process, therefore the schedule identified is always tentative." Thus, there is now acknowledgment that requirements exist prior to 2020, but neither a "strategy" for future compliance nor a documentation of past compliance are presented.	No additional requirement to address October 27, 2014 Board comment (but see #32 below).	There is no evidence that this comment was further considered. Table 3-1 is unchanged in every version of the WMP, and the introductory text for Section 5 ("Compliance Schedule and Cost") is unchanged between the Revised and the Final WMP (except for the correction of a typographical error). It reads "Interim and final compliance dates in the LAR Metals and Bacteria TMDLs are the primary drivers for the LAR UR2 WMA RAA and WMP Plan implementation schedule. The dates identified in this WMP Plan are subject to the procurement of grants or other financing support commensurate with the existing and future fiduciary responsibilities of the Permittees. They may furthermore be adjusted based on evolving information developed through the iterative adaptive management process identified in the 2012 MS4 Permit or similar Parts within future MS4 Permits." There is no "documentation" or commitment to meet interim WQBELs; this comment has been completely ignored.	"The BMP implementation schedules and Figures 5-1 to 5-6 were reviewed with Board Staff to clarify how they anticipated this comment. Data from the nitrogen RAA, showing that existing nitrogen loads were already below the allowable Loads, were shared with Board staff. Section 4 of the Final WMP was completely reformatted and expanded to more clearly convey data developed for the draft RAA and WMP regarding nitrogen loads and compliance with interim WQBELs."	Figures 5-1 through 5-6 were revised for the Final WMP, with dramatic (but undocumented) changes to several of the asserted load reductions (particularly copper). These changes do not address the original Board comments as written.	"Sections 4 and 5 of the Revised WMPs were revised to add clarity and specificity to the Group's phased implementation schedule relative to interim TMDL compliance deadlines. The Revised WMP also summarizes monitoring data from the LA River Metals TMDL coordinated monitoring program, which indicate that metals rarely exceed receiving water limitations during dry-weather at monitoring stations adjacent to the LAR UR2 watershed management area. (The interim compliance deadline of 2020 for metals in dry weather is one of the nearer term deadlines for the Group.) "The Group will further evaluate whether past interim and final deadlines have been met as data are collected through the Group's CIMP."	This response continues to address only a subset of the original comment elements, which focused on commitments and specificity for compliance strategy and schedule. Relevant changes presumably should be found in Section 5.1, "WMP Implementation Schedule," but as noted in the earlier analysis of the Revised WMP these changes are minimal and non-responsive. It appears as though all such commitments, originally anticipated as part of the WMP, have now been deferred to future evaluations of unspecified timing and commitment.

Los Angeles River Upper Reach 2

Index LSGR	Index LLAR	INDEX LAR UR2	Permit Citation	Board Staff Comments from October 27, 2014	Analysis of Revised WMP (January 27, 2015) in response to Board Comments	Conditional Approval Requirements (April 28, 2015)	Analysis of Final WMP (June 12, 2015)	In August 3, 2015 LAR UR2 Response Letter	Analysis of Response Letter statements	Staff Response (August 2015)	Analysis of Staff Response
--	--	7		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 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.	There is no evidence that this comment was considered or addressed.	No additional requirement to address October 27, 2014 Board comment.	Reference is made to the existence of supporting information in the Final WMP Section 4.2.4, although no "additional discussion" is provided: "For total lead and nitrogen, critical condition baseline loads achieve the MS4 Permit Attachment O WQOs, therefore no reductions are necessary..." (Final WMP, p. 94)				
--	--	8		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 SMPs.	The referenced sentence (p. 33 of both the Draft and Revised WMP's) is unchanged. The Revised WMP now includes a revision to Table 3-8, "Potential Non-Structural BMP Enhanced Implementation Efforts" that provides identical information but has removed the word "Consider" from every action (e.g., "Consider more frequent street sweeping" in the Draft WMP is now "More frequent street sweeping" in the Revised WMP. Despite the deletion of one word, the table is introduced with text that is unchanged from the Draft WMP: "Each LAR UR2 WMA City will have the flexibility to implement some or all of the enhancements, which may vary among the group members based on their individual assessment of priorities and the applicability of the potential enhancement" (p. 67). This falls far short of a commitment to a "firm scheduled" required by the Board comment.	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.	The Final WMP has further updated Table 3-8 and re-titled it "Non-Structural BMP Enhanced Implementation Efforts and Dates" that includes implementation dates of some trash-TMDL-related actions for individual jurisdictions, but the table is introduced with text that is unchanged since the original Draft WMP: "Each LAR UR2 WMA City will have the flexibility to implement some or all of the enhancements, which may vary among the group members based on their individual assessment of priorities and the applicability of the potential enhancement" (p. 67). In all drafts, this falls far short of a commitment to a "firm scheduled" required by the Board comment.				
11	12	9		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.	In the Reasonable Assurance Analysis (RAA) Section 4, the original "justification" for this assertion was stated in the Draft WMP (p. 69) as follows: "The 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. Bacteria and metals were determined to be the limiting pollutants because they meet the following criteria: <ul style="list-style-type: none"> ● Relatively high priority with respect to meeting TMDL WLAs and/or other WQOs; ● Conservative with respect to attenuation during fate and transport modeling; and ● Require the greatest amount of volumetric control to achieve TMDL WLAs and other objectives." This wording is unchanged in the Revised WMP.		The Final WMP includes the following modified text (Section 4, p. 73): "For the LAR UR2 WMA TMDL identified bacteria and metal pollutants were anticipated to be priority and BMP design limiting pollutants as a result of the following physical characteristics, approved RAA guidelines, and regulatory criteria: <ul style="list-style-type: none"> ● Ambitious TMDL interim and final compliance schedules for achieving WLAs; ● Reported and previously observed conservative fate and transport characteristics; and ● Treatability and regrowth characteristics that impose implementation of volumetric watershed control measures on Permittees in order to demonstrate achievement of TMDL WLAs and WQOs." This (minimally) revised text does not provide meaningful support for this assertion, particularly since these attributes are supposed to apply to both metals and bacteria alike, two very different pollutants.			"Section 2.4 of the Revised WMP was revised to clarify that Category 2 and Category 3 pollutants were well represented by Category 1 pollutants (see Table 2-7). For example, "coliform bacteria," a Category 2 pollutant, is represented by E. coli, a Category 1 pollutant, while various metals identified as Category 3 pollutants are represented by other metals that are Category 1 pollutants. This adequately addressed Board staff's comment."	The new text in the Revised WMP in Section 2.4 asserts that "It should be noted that the Category 3 pollutants overlap significantly with Category 1 or 2 pollutants and in some cases, such as fecal coliform and E. coli, or total nitrogen and nitrate, they are essentially the same pollutant." As noted in #5 above, it is untrue that total nitrogen (TN) and Category 1 inorganic nitrogen compounds are "the same pollutant" (TN consists of, in addition, various organic nitrogen compounds). This statement is simply incorrect. Table 2-7 is a list of pollutants but does not further "clarify" anything (see also #1, above).

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--	--	10	Part VI.C.5.b. Selection of Watershed Control Measures (pages 61- 64)	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.	A brief narrative description of three LID projects has been added.	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.	The Final WMP (Section 3.3.3) has added a list of three LID street BMPs: one planned, one under construction, and one completed. Mere mention of three LID street BMPs, only one finished or with a solid commitment (and which affect only two permittees), is marginally responsive to the request but also demonstrates minimal commitment.	"Section 4 of the Final WMP was completely reformatted and expanded, including section 4.5.2 which now identifies examples of Green or LID streets currently under construction by LAR UR2 WMA Permittees. Cities with Pavement Management Plans or Systems, which guide the implementation of LID or Green Streets, were identified in WMP Sections 3.2.2 and 4.5.2."	Section 4.5.2 does articulate seven modeled LID projects, but it is not clear whether any of them have been committed to construction (the text states, "LID Streets will be implemented on smaller street projects"). Indeed, this section goes on to warn "It is important to note that the majority of LAR UR2 WMA Permittees do not yet have a Pavement Management System (PMS), or pre-approved street maintenance budget, and that LID or Green Street project implementation may vary substantially from one year to the next," suggesting an absence of any binding commitment.	"Table 4-10 of the revised and final WMP lists the extent of LID streets that will be required within the jurisdiction of each LAR UR2 Permittee."	The text introducing Table 4-10 ("2028 LID Based Redeveloped Area in Acres by City and Land Use") reads: "Average annual redevelopment rates released by the City of Los Angeles (City of Los Angeles Bureau of Sanitation, 2009) were used to establish what area within each land use category can be expected to be retrofitted consistent with the Permit's post-construction onsite retention requirements." The remainder of this section (4.4.2) discusses modeling assumptions. There may be a "requirement" associated with these areas that "can be expected to be retrofitted," but the WMP does not state that to be the case.
--	--	11		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.	The Revised WMP has added statements of Legal Authority provided by the Cities of Bell, Bell Gardens, Commerce, Cudahy, Huntington Park, Maywood, and Vernon, and Los Angeles County Flood Control District.	No additional requirement to address October 27, 2014 Board comment.	None needed.				
--	--	12		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.	There is no evidence that this comment was considered or addressed. No text involving mention of this process was changed. Consistent with the Board comment, the complete absence of characterizing "adaptive management" or how it will be implemented is a fundamental shortcoming of this WMP (and one that applies to the LLAR and LSGR as well, despite an absence of Board comments on this topic for those WMPs).	No additional requirement to address October 27, 2014 Board comment.	No change.				

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9	8	13		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 text relating to the assumed 5% load reduction was revised as follow: "Based on input from the Regional Board, load reductions derived from non-modeled non-structural BMPs can be assumed to be five percent of baseline loads." (Draft WMP, p. 67) "Load reductions derived from non-modeled non-structural BMPs are assumed to be five percent of baseline loads, based on the extensive additional permit requirements and programs as previously identified in Section 3.1.1." (Revised WMP, p. 67) However, this change was not carried over into Section 4.3.2.3, which states in both versions "Load reductions derived from non-modeled, non-structural BMPs were assumed to be 5 percent of baseline loads for all pollutants following discussions with the Regional Board." (Draft WMP, p. 82; Revised WMP, p. 87). None of these "changes" are substantive responses to this comment.	No additional requirement to address October 27, 2014 Board comment.	The discussion of an assumed 5% load reduction was further revised between the Revised and Final WMP as follow: "Load reductions derived from non-modeled, non-structural BMPs were assumed to be 5 percent of baseline loads for all pollutants following discussions with the Regional Board." Revised WMP, p. 87) "Following discussions with the Regional Board, load reductions derived from not otherwise modeled, non-structural BMPs were estimated to results [sic] in a modest 5 percent of baseline loads for all pollutants." Final WMP, p. 100) Although the "assumptions" of the Revised WMP are now "estimates" in the Final WMP, this is not a substantive response to this comment.				
10	10	14		The WMP assumes a significant reduction in copper based 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 copper 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 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 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 no changes in text between the Draft and Revised WMP. 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 are provided. This issue is of significant concern because sources of zinc and copper are not necessarily coincident, and frequently are not. This comment has not been addressed.	No additional requirement to address October 27, 2014 Board comment.	Trivial changes of wording between Section 4.3.2.2 (Revised) and 4.3.3 (Final), but they provide no substantive change or response to the original Board comment.	"Section 4 of the Final WMP was completely reformatted and expanded, including section 4.4.3 which includes a sensitivity analysis, included as Table 4-12, demonstrating that the RAA assumed 50% reduction, by 2028, in copper loads attributable to changing brake pad formulations, was conservative."	Table 4-12 only demonstrates that if the 50% reduction occurs then the milestones will be reachable. A "conservative assumption," however, would evaluate with reasonable skepticism how the reduction in the copper content of new cars' brakes would translate into reduced copper loadings: based on the 2007 AquaTerra study, a "conservative" estimate would be that 15% of copper (their low-end finding) arises from brake pad wear (a similar study in Washington State put the percentage of this source at 20%). Given that the average age of cars on the road is about 11 years, this suggests that zero-copper brake pads imposed as of 2025 might reduce copper loads by only about 10% by 2036, nowhere near what is required for the TMDL compliance date. The original Board's comment is still relevant and unanswered.	"The RAA's approach of using zinc as a limiting pollutant, while anticipating copper reductions through Senate Bill 346 is an adequate approach to compliance with copper WQBELs. Therefore, no condition was included in the Executive Officer's approval letter to address this comment. The WMP Group has clarified its approach and estimates of copper reductions under Senate Bill 346 have been provided since issuance of comments on the draft WMP. Specifically, the Revised WMP provided detail on expected reductions in copper runoff under various implementation scenarios at TMDL compliance milestones (Section 4.3.2.2, Table 4-8, pg. 87)."	See prior response (the relevant section in the Final WMP is 4.4.3, Table 4-12, p. 100).

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15	9	15		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 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.	The closest the WMP comes to responding to this comment is an added sentence in Section 3.1.1 (p. 35 of the Revised WMP) stating "The Industrial and Commercial Facilities Inspection programs will significantly benefit from the greater emphasis on annual progress reporting and also the tables identified in the Permit and specifying specific BMPs, source controls, MCMs, and watershed control measures that should be apparent during commercial and industrial inspections." The statement is vague and does not even name, let alone commit to, specific measures such as those mentioned in the Board's comment. This comment has not been addressed.	No additional requirement to address October 27, 2014 Board comment.	No change.				
--	--	16	Part VI.C.5.b.iv.(5) Reasonable Assurance Analysis - Categories 2 and 3 Pollutants	"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 additional requirement to address October 27, 2014 Board comment.	No change.			See also #9	
RAA EVALUATION LETTER											
--	--	17	(A.1. "General comments")	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". 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.	The table was unchanged from Draft to Revised WMP.	No additional requirement to address October 27, 2014 Board comment.	Table 1-5 was updated for the Final WMP.				"The revised WMP did not correct the error. However, during a subsequent meeting, Board staff directed the Group to correct Table 1-5 to reflect the correct effective date for the Los Angeles River Nitrogen Compounds and Related Effects TMDL."

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--	--	18	(A.2. "General comments")	<p>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.</p> <p>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.</p>	<p>The previously noted statement added to the Revised WMP, "It should be noted that the Category 3 pollutants overlap significantly with Category 1 or 2 pollutants and in some cases, such as fecal coliform and E. coli, or total nitrogen and nitrate, they are essentially the same pollutant" (p. 33 of the Revised WMP) is presumably intended to be responsive to this comment, but is not.</p> <p>The referenced table (Table 4-4) is identical in both Draft and Revised WMPs.</p>	No additional requirement to address October 27, 2014 Board comment.	Updated table (Table 4-6 in the Final WMP) presents daily loads, as requested.				
--	--	19	(A.3. "General comments")	<p>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.</p>	<p>The only change in the Revised WMP in this section was the addition of a sentence, "The observed or modeled daily flow volumes can be used to translate concentration-based WQBELs to load-based WQBELs by multiplying the daily flow volumes with concentration-based WQBELs" (p. 82). This is not responsive.</p>	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.	This section was substantially rewritten and improved.				
--	--	20	(B.1. "Modeling comments")	<p>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.</p>	No change was made in the tables.		This section was substantially rewritten and improved.				

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--	--	21	(B.2. "Modeling comments")	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.	No changes were made with respect to Table 4-3 or the use of surrogates for cadmium.	No additional requirement to address October 27, 2014 Board comment.	The table of baseline loads (Table 4-3 in the Revised WMP, Table 4-5 in the Final WMP) has been revised to show daily wet-weather loads, but not the predicted runoff volume or concentrations. The sentence on page 73 of the Revised WMP that references this topic, "...total cadmium (copper, lead, and zinc will be used as surrogates)" has simply been eliminated in the Final WMP. No discussion of cadmium is present at all in the final Plan.				
23	19	22	(B.3. "Modeling comments")	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.	There is no evidence that this comment was considered or addressed.	No additional requirement to address October 27, 2014 Board comment.	This section was substantially rewritten and improved. Results with the desired outcome (i.e., simulated concentrations/loads vs. allowable concentrations/loads) are summarized, but the requested time series for each pollutant have not been provided as part of the WMP.	"Section 4 of the Final WMP was significantly revised and expanded to address many of the Board Staff identified comments, including the initial choice of pollutant load units and analysis periods in the draft WMP. Figures 5-1 to 5-6 were also revised to address comments on the pollutant load units and other requested changes in the RAA."		"Time series data were provided in model output files. Total BMP load reductions that exceed the target load reductions indicate that reasonable assurance (of meeting the permit limits) has been demonstrated for that pollutant for that drainage area. The tables in combination with the model output files adequately addressed Board staff's comment." "Section 4.3.1, Target Load Reductions, details how the Target Load Reductions were calculated. The Group provided model input and output files that allowed Board staff to verify the calculated Target Load Reductions. The Groups' explanation adequately addressed Board staff's comment."	

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		23	(B.4. "Modeling comments")	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.	There is no evidence that this comment was considered or addressed.	No additional requirement to address October 27, 2014 Board comment.	This section was substantially rewritten and improved, but model outputs for bacteria and metals (Tables 20-23) still do not show any interim performance as originally requested by the Board comment, only end-date performance. Note that E coli fails to meet the required reductions under the "Low (25th percentile)" condition.	"Section 4 of the Final WMP was significantly revised and expanded to address the comments. Figures 5-1 to 5-6 were further revised to address comments on pollutant load units and other requested changes in the RAA."	This statement is only partly responsive to Board's comments; analysis of Final WMP is still unaddressed.	"The Group submitted the model input and output file in response to Board staff's request. The revised WMP relies on a storm water volume capture approach to demonstrate compliance with WQBELs and receiving water limitations. The modeling calculated the necessary volume capture to achieve compliance with WQBELs and receiving water limitations. Section 4.3.1, Target Load Reductions, includes the calculated volume capture of the MPs that need to be implemented to achieve compliance. Table 5-1 of the revised WMP identifies the proposed control measure implementation schedule based on the phasing needed to achieve compliance with interim and final compliance targets for both bacteria and metals. The final WMP was revised in response to a condition in the Executive Officer's approval letter to modify the title of Table 5-1 to Control Measure Implementation Schedule, removing the word "tentative" from the title."	The text associated with Table 5-1 has added the following text: "The WMP, including the schedule aspect, will be updated through the adaptive management process; to that extent, the implementation schedules identified are tentative unless determined as a date certain associated with specific TMDL provisions." Thus, removal of the word "Tentative" from the title of Table 5-1 does not appear to align with any substantive change.
		24	(B.5. "Modeling comments")	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.	There is no evidence that this comment was considered or addressed.	No additional requirement to address October 27, 2014 Board comment.	No change.	"The requested subwatershed ID numbers were provided, along with the Draft and Final RAA model input and outputs data files, to the Regional Board Staff."		"The Group provided the subwatershed ID numbers as well as submitted the model input and output files in response to Board staff's request."	
		25	(B.6. "Modeling comments")	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).	There is no evidence that this comment was considered or addressed.	No additional requirement to address October 27, 2014 Board comment.	This information may be provided in an appendix, but no such tabulation is provided in any draft of the WMP.	"The subject subwatershed time series, flow, volume, and pollutant data were provided, as part of the Draft and Final RAA model input and outputs data files, to the Regional Board Staff."		"The Group submitted the model input and output files in response to Board staff's request. The time series output is contained within the submitted model files."	These data are not available for review.

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--	--	26	(B.7. "Modeling comments")	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 additional requirement to address October 27, 2014 Board comment.	The Final WMP omits the rationale of Section 4.3 of the Revised WMP ("no approved models are applicable") and replaces it with the following text (p. 73): "With the Permit requirement to eliminate non-exempted, non-stormwater discharges, there is no technical basis upon which to develop a credible quantitative dry-weather RAA and compliance can be assumed through demonstrated implementation of requirements and prohibitions." Thus, any analysis of reasonable assurance is deferred to other programs, although the WMP quotes the bacteria TMDL in observing that "Dry-weather urban runoff and stormwater conveyed by storm drains are the primary sources of elevated bacterial indicator densities to the Los Angeles River Watershed during dry- and wet-weather." (Final WMP, p. 30)	"Non-Stormwater (dry-weather) Discharge Control Measures are identified in Final WMP section 3.1.3 on page 39. Despite receiving runoff from over 4 square miles of the LAR UR2 WMA, and an approximately 120 square mile tributary watershed, dry-weather flows are typically absent from the Rio Hondo Reach 1."	Section 3.1.3 is identical in all versions of the WMP, and it states: "Part VI.C.5.b.iv.(2) of the MS4 Permit states that where Permittees identify non-stormwater discharges from the MS4 as a source of pollutants that cause or contribute to exceedance of RWLs, the proposed watershed control measures must include strategies, control measures, and/or BMPs that must be implemented to effectively eliminate the source of pollutants consistent with Parts III.A and VI.D.10 of the MS4 Permit. These may include measures to prohibit the non-stormwater discharge to the MS4, additional BMPs to reduce pollutants in the non-stormwater discharge or conveyed by the non-stormwater discharge, diversion to a sanitary sewer for treatment, or strategies to require the non-stormwater discharge to be separately regulated under a general NPDES Permit." This is completely non-responsive to the comment.	"Generally, modeling of non-stormwater discharges is not conducted due to uncertainties in predicting dry weather runoff volume, which is driven by variable and unpredictable human activities rather than climatic factors. As such, dry weather compliance strategies are generally more conceptual...The Final WMP includes a new section 3.1.5.3 and revisions to Table 1-6, which identify steps and dates for investigating outlier outfalls as required by the condition in the approval letter (pg. 41). The dry weather RAA approach is appropriate."	The new referenced Section 3.1.5.3 is limited to dry-weather bacteria sources. Other elements of the original comment have not been substantively addressed.
--	--	27	(B.8. "Modeling comments")	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.	A new section (4.5) was added to the Revised WMP, being a brief statement with an unusual future tense to the referenced activities: "For the RAA hydrologic series of 1986 to 2011, daily baseline concentrations and loads will be determined from the 90th percentile. The runoff values from the storm events will first be found, then any loads less than a tenth of an inch will be removed. From there, the load days from the 90th percentile will be retrieved." (p. 103) This suggests that no change was made in response to this comment.	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.	Section 4.5 Modeling Calibration was deleted in its entirety in the Final WMP. Calibration is now discussed in a new section 4.1.3, Pre RAA Model Calibration, wherein it is made clear that no calibration of the current model has been conducted in the LAR UR2 watershed using data from current conditions. All calibration information presented in the Final WMP "...address some of the broader hydrology and pollutant modeling and calibration efforts, to which LSPC and SBPAT were subjected and evaluated." (p. 75). Limited calibration are presented, all conducted by others over one decade in the past. Without clear, convincing justification for the relevance and continued applicability of these results to the watershed, this model-based RAA cannot provide "reasonable assurance" of any outcome.				
--	--	28	(B.9. "Modeling comments")	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.	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 additional requirement to address October 27, 2014 Board comment.	This approach was (properly) abandoned in the Final WMP.	"Section 4 of the Final WMP was significantly revised and expanded to address several of the Regional Board and Petitioner comments. Table 4-1 and Figures 4-15 and 4-16 in particular address this comment."		"The final WMP was revised to include Table 4-1, which lists the annual rainfall depth, for each year, for the period of 1989 to 2011. The comment was appropriately addressed."	

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CONDITIONAL APPROVAL LETTER											
--	--	29	--	--	--	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."	The offending sentences were removed in the Final WMP. They were replaced with the following "Nothing in this WMP shall affect the administrative petitions of those Cities, nor shall anything in this WMP constitute a waiver of any Permittee positions or rights therein." (p. 15)				
--	--	30	--	--	--	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.	A new Section 3.1.5.3 Los Angeles River Bacteria TMDL Implementation Plans was added to the Final WMP (p. 41) that notes the December 2014 submittal and commits to the "investigation" of 4 outfalls at 6-month intervals beginning in September 2015.				
--	--	31	--	--	--	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.	The offending words have been removed, and (generally) specific implementation dates for specific actions/permittees have been added. For two permittees (Bell and Maywood), several actions have "Fiscal Constraints" in the space otherwise reserved for dates.				

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--	--	32	--	--	--	<p>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..."</p>	<p>The word "Current" has been substituted, along with the insertion of "Final" (in quotes) to read "Current Control Measure 'Final' Implementation Dates". The requested phrase has been substituted with the minor modification "...the implementation schedules identified are tentative unless determined as a date certain associated with specific TMDL provisions" (instead of the requested "...unless the schedule is associated with TMDL provisions").</p> <p>Note, however, that on the same page the Final WMP continues to read "The dates identified in this WMP Plan are subject to the procurement of grants or other financing support commensurate with the existing and future fiduciary responsibilities of the Permittees. They may furthermore be adjusted based on evolving information developed through the iterative adaptive management process identified in the 2012 MS4 Permit or similar Parts within future MS4 Permits." In addition, most of the implementation actions in Table 5-1 do not occur are not complete until 2028 or later (and none prior to 2016).</p> <p>Thus, despite the apparent intent of this Board comment and the specific wording change, there remains no commitment to meeting these (rather unambitious) final milestones, and no identification of actions to meet interim milestones.</p>				

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--	1	1	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...the LA County MS4 Permit..."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.	Section 1.1 now paraphrases the above-stated goals of the Regional Board, and as in the Draft WMP further notes that "The ultimate goals of the WMP are listed in Section 1.2.3." However, no mention in either draft of the WMP includes the last concern of the Board, that "controls are implemented to reduce the discharge of pollutants to the maximum extent practicable (MEP) pursuant to Part IV.A.1."	No additional requirement to address October 30, 2014 Board comment.	No change.				
--	--	2	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.	This has been added as Table 2-3 (p. 2-6).						
--	--	3	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.	This has been added as Table 2-4 (p. 2-10)						
--	4	4	Part VI.C.5.a .iii.(I)(a)(vii) (Source Assessment)	The MS4 Permit requires a map of the MS4 including major outfalls and major structural controls...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.	This has been addressed in part as Figure 3-16 (Locations of Existing Structural BMPs; p. 3-48)						
--	6	5	Part VI.C.5.a.iv (Watershed Control Measures)	...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. ...it would be reasonable to update the WMP to contain project milestones and implementation timeframes for projects that will be implemented under this grant.	Text has been added to p. 5-1: "Meeting the load reductions determined by the RAA results in an aggressive compliance schedule in terms of the technological, operational, and economic factors that affect the design, development, and implementation of the necessary control measures. Notably, as described in Chapter 6, there is currently no funding source to pay for these controls...As such the Group considers the compliance schedule to be as short as possible..."the aggressive schedule in place to target zinc provides an equally aggressive schedule to target the remaining WQPs, and as such it is considered to be as short as possible for all WQPs." This passage has interpreted the Board's requirement for ASAP compliance in strictly financial terms, with additional indeterminate delays added for acquisition and "conversion." In response to the requirement for "a clear schedule," a new paragraph has been added on page 5-2: "Uncertainties associated with the targeted nonstructural controls complicate establishment of specific implementation dates...the status of these controls will be included in the annual watershed reports as well as through the adaptive management process in order to assess their progress in attaining targeted load reductions. Table 5-1 lists the nonstructural TCM compliance schedule." This response makes clear that no commitments to "specificity or actions" or associated timelines. For example, of the 5 actions on Table 5-1 of the Draft WMP showing a 2014 start date, two are now listed in the Revised WMP as having July 2015 start dates. I also find no cross-walk between scheduled completion dates and interim compliance deadlines, as requested by the Board's comment.	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.	All requested wording changes were made for the Final WMP; however, none of the substantive requirements of the October 30, 2014 Board comments have been met.				

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--	7	6	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...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.	The only changes to the Executive Summary of the RAA (Section 4.1) states that the RAA "determined that the metal zinc will be the primary or 'limiting' pollutant and that by implementing the structural and non-structural measures . . . to reduce zinc, the remaining pollutant goals will be achieved ...The rationale . . . is included Section 5.3.1 of the RAA (Appendix 4-1)" (see # 11 below). However, the request was for determining if "compliance with limitations for pollutants not addressed by TMDLs could be achieved <i>in a shorter time frame</i> " [emphasis added]. This comment has not been addressed.	No additional requirement to address October 30, 2014 Board comment.	No change.	"The introduction to Section 5 was modified to more clearly demonstrate that the compliance schedule is as soon as possible for pollutants not addressed by TMDLs."	The referenced modification in the Revised (and Final) WMP reads as follows: "Meeting the load reductions determined by the RAA results in an aggressive compliance schedule in terms of the technological, operational, and economic factors that affect the design, development, and implementation of the necessary control measures. Notably, as described in Chapter 6, there is currently no funding source to pay for these controls. Assuming finances are available, conversion of available land into a regional BMP is a protracted process that can take several years (not accounting acquisition, when required). As such the Group considers the compliance schedule to be as short as possible." This is not an analysis of non-TMDL pollutants but rather a discussion of how an absence of committed funding can impose indefinite delay on water-quality improvements. The problem may be genuine but the WMP remains non-responsive and offers no guidance on how to proceed.	"The revised WMP provides an estimate of the cost of structural BMPs and based on this estimated cost, reiterates the financial difficulties and uncertainties of implementing the WMP (particularly the lack of funding sources for controls), and concludes that the compliance schedule is as short as possible to allow time to both address technological and operational challenges and to secure the necessary funding to implement the watershed control measures in the WMP... The Group's existing strategy to control pollutants "as soon as possible" is sound. " [emphasis added]	No "strategy" is evident in the response.
--	11	7	Part VI.C.5.b.iv.(i)(a)(i) Minimum Control Measures - Industrial/Commercial Facilities Program)	The revised WMP should ensure that any alternative prioritization method used by a City must also be based on water quality impact...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.	These changes have been made						

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--	8	8	Part VI.C.5.b.iv.(4)(b)-(d) (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.	Both the Draft and Revised WMP have the following text (without changes between versions): "Specific green streets projects were not investigated during this initial analysis for potential BMPs, therefore, the City-specific summary lists potential regional LID BMPs that <i>could</i> be used to achieve the required interim milestones and targets. Since this WMP is a planning-level document, over time the Watershed Group will report and demonstrate that the summative effect of projects implemented add up to the required reductions for interim milestones and final targets." <i>[emphasis in original]</i> Since this wording elicited the initial Board comment on the Draft WMP, its persistence in the Revised WMP is non-responsive. Section 5 was revised and now states: "'Uncertainties associated with the targeted nonstructural controls complicate establishment of specific implementation dates. Despite this uncertainty, the Group has made a diligent effort to provide a clear schedule of specific actions within the current and next permit terms in order to achieve target load reductions. In addition, the status of these controls will be included in the annual watershed reports as well as through the adaptive management process in order to assess their progress in attaining targeted load reductions.'" (p. 5-2) Thus, no commitment has been made beyond good intentions and a (mandated) willingness to track progress (or its lack thereof) through the permit cycle.	No additional requirement to address October 30, 2014 Board comment.	No change.	"The commitment language was included in the Revised (and Final) WMP in Section 5.3. Also included were modifications to increase the degree of clarity and specificity regarding schedules and actions for the current and next permit terms. Of particular note, WMP Section 5.3 was revised to include a 2015-2016 schedule of feasibility studies and site assessments to determine specific projects to address the milestones in the compliance tables of the RAA, Attachment B."	The one change in this section that includes new dates specifies, for regional BMP's only, that "preliminary site assessments and feasibility study will be completed by March 2016. Field analysis at selected sites will begin in December 2016." The text goes on to state, "Even though not all projects can be specified and scheduled at this time, the Participating Agencies are committed to constructing the necessary regional and right-of-way BMPs to meet the determined load reductions per applicable compliance schedules. Through implementation of the WMP and adaptive management there is the potential for the final compliance milestones to change." This final caveat raises some concern over the nature of "any such commitment."	"The Final WMP includes two new tables, Tables 5-2 and 5-3, which provide detail on the Permittees responsible for each LID BMP, and the deadlines and status for the project tasks (pgs. 5-4 to 5-5)...The Group has conveyed to Board staff that the information contained in Section 5 is the maximum practicable given uncertainties and that greater certainty will be provided through the adaptive management process."	Given the minimally defined state of the "Adaptive Management Process" (Section 9), greater future certainty is not guaranteed.
13	8	9	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...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 (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.	These requirements were already articulated in Table 2-4 of the 2014 RAA. There are no apparent wording changes between the Draft and Revised of the WMP that directly address this comment, which presumably reflected a shortcoming in the original document. Given the vague nature of nearly all of the nonstructural "milestones" and provisional nature of virtually all of the BMP's, it's not surprising that there is no direct linkage between committed actions and achieving interim requirements by specified dates. Quite possibly, there are insufficient projects in the pipeline, or credibly on-schedule for implementation at the present time, to achieve even the 2017 targets.	No additional requirement to address October 30, 2014 Board comment.	No change.	"Section 5 of the Revised (and Final) WMP was modified to increase the degree of clarity and specificity regarding schedules and actions for the current and next permit terms. The corrections to the Final WMP further refined these commitments. The Group has also addressed the inherent uncertainty as to which specific BMPs will be implemented to address the milestones in the RAA compliance tables (RAA Attachment B): Section 5.3 was revised to include a 2015-2016 schedule of feasibility studies and site assessments to determine specific projects."	"The Revised WMP provided more specificity in Section 5 regarding structural and non-structural best management practices (BMPs)...the Revised WMP did not contain definitive milestone dates, nor did it specify the Permittees responsible for the projects. The Executive Officer's approval letter included a condition that the Group add definitive dates for these LID BMPs...The Final WMP addresses this condition by including additional milestones and dates for their achievement."	The inclusion of a specific month and day to the year of implementation is not a substantive change, and there is no indication that implementation of the LID BMP projects listed in Table 5-2 will achieve the required interim reductions noted in the original comment. Most of the requirements from the original Board comment have not been met.	
14	10	10	Part VI.C.5.b.iv.(4)(c) (SB 346 Copper Reductions)	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 for interim and/or final WQBELs.	No change was made in the document in response to the comment.	No additional requirement to address October 30, 2014 Board comment.	No change.	"A change to the document was not necessary as explained in a response table to the RB. The RAA approach of controlling zinc, in concert with the modeled effect of copper load reductions anticipated through SB 346, anticipates that the application of the Watershed Control Measures and Compliance Schedule of Chapter 3 and 5, respectively, will reduce copper loads sufficiently to achieve compliance deadlines from interim and/or final WQBELs."	"The RAA's approach of using zinc as a limiting pollutant, while anticipating copper reductions through Senate Bill 346 is an adequate approach to compliance with copper WQBELs. Therefore, no condition was included in the Executive Officer's approval letter to address this comment"	This response suggests that the Board's original judgment ("The draft WMP appears to rely mostly on the phase-out of copper in automotive brake pads...to achieve the necessary copper load reductions") was simply incorrect. If that is the present conclusion of the staff it should be clearly articulated as such.	

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9	12	11	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.	A microscopic change in wording has been made on p. 4-1 between the Draft and the Revised WMP. DRAFT: "The RAA has determined that the metal zinc will be the primary or "limiting" pollutant and that by implementing structural and non-structural measures to reduce zinc, the remaining pollutant goals will be achieved." REVISED: "The RAA has determined that the metal zinc will be the primary or "limiting" pollutant and that by implementing the structural and non-structural measures in Chapter 3 to reduce zinc, the remaining pollutant goals will be achieved for the Water Quality Priorities defined in Chapter 2. The rationale for this modeling approach is included Section 5.3.1 [sic] of the RAA (Appendix 4-1)." [Note the identical typo is present in the Lower Los Angeles River Revised WMP.] The request for explicit explanations for each pollutant has not been followed.	No additional requirement to address October 30, 2014 Board comment.	No change.	"Section 5.3.1 of the RAA justifies how Category 1, 2, and 3 pollutants are controlled through the limiting pollutant approach. This statement, along with a reference to the RAA for justification, is included in Section 4.1. The revised introduction to Section 5 provides explicit statements regarding the implementation of this approach in order to achieve applicable receiving water limitations."	The revised text of Section 5 states "This is true for all WQPs—by the nature of the limiting pollutant approach, it is expected that each of the remaining WQPs will be controlled at a faster rate than zinc." As such it is a definition of a limiting pollutant approach but nothing more.	"The Group has added additional clarification on its limiting pollutant approach in Section 5 (pg. 5-1) of the WMP and in Section 5.3.1 of the RAA (Appendix A-4-1, pg. 38). The revised WMP does not state and justify this approach for each category 1, 2, and 3 pollutant; however, this is not necessary given the Group's limiting pollutant approach."	Section 5.3 of the RAA notes "Overall findings of the study estimated that of the anthropogenic sources of copper, approximately 35 percent are attributed to brake pad releases (BPP 2010). Even if the reduction was only half of this amount, the adjustment to the required copper reduction would still result in zinc being the limiting pollutant in LLAR, LCC, and LSGR." Setting aside whether "only half" is a reasonable expectation for copper reductions from SB 346, it suggests that other pollutants might have similarly significant required reductions relative to zinc, but because they were not modeled this cannot be assumed. Simply asserting that zinc is limiting based on only a few constituents (and then redefining the term) does not constitute proof.
--	8	12	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...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...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."	The following passage was added to Section 4.3: "Currently there is insufficient information to accurately model the implementation of the controls listed in Section 3.2.3 through 3.4.1. These non-modeled controls were instead assigned a modest fraction of 10% for their cumulative load reduction. As part of the adaptive management process the Participating Agencies will evaluate this assumption during Program implementation and develop alternate controls if it becomes apparent that the assumption is not supported. However, despite the uncertainty surrounding the specific load reductions for these controls, there is support to suggest that the assumption is in fact a modest one." (p. 4-2 and 4-3)			"Section 4.3 was added to the Revised WMP to address the Regional Board comment. The Regional Board also states that, '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.' This commitment was also included in the in Section 4.3."		"Section 4.3 also clarifies the support for the 10% pollutant reduction and commits to a reevaluation of the assumption: 'Agencies will evaluate this assumption during Program implementation and develop alternate controls if it becomes apparent that the assumption is not supported.'"	
--	9	13	Part VI.C.5.b.iv.(S) (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...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.	A new section (4.2.1) was added to the 2015 WMP that summarized the results of 4 studies (1997, 1998, 2004, 2010) on reductions in residential water use, which suggest that 25% reduction is a plausible outcome. The referenced RAA section is only 1 page and was not changed between the 2014 and 2015 versions. The justification for 25% reductions is plausible, as current response to emergency drought measures have recently demonstrated, but it is hardly "conservative" (as stated in the text); it also presupposed implementation of actions that would lead to such an outcome. By using emergency drought regulations as an example of how public education can reduce water use, it begs the question of their applicability to sustainable, long-term reductions.	No additional requirement to address October 30, 2014 Board comment.	No change.				
--	9	14	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...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 additional requirement to address October 30, 2014 Board comment.	No change.				

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15	9	15	Part VI.C.5.b.iv.(5) (Reasonable Assurance Analysis - Permitted Industrial Facilities)	...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.	A substantial amount of new information was added to the RAA, although the organization (e.g., multiple "Attachment A" documents) make a clear understanding of their interrelationships difficult. A new Attachment E: Minimum Control Measure Guidance" includes 10 pages on implementing an Industrial/Commercial Facilities Program, although the document explicitly "provides guidance" rather than stating a requirement of the WMP.						
--	--	16	Part VI.C.S.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...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.	The 2015 text has been modified and now reads "The footnote specifically states: 'The requirements of this Order to implement the obligations of [the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants 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).' The submission of this WMP and its associated CIMP and any action or implementation taken pursuant to it shall not constitute a waiver of any such release of obligations established by that Amended Consent Decree." (p. 3-22)						
--	--	17	Part VI.C.5.c (Compliance Schedules)	Page 6-1 notes that "the 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.	The offending phrase in Section 6.1 ("The final non-TMDL water quality standard compliance date is projected to be sometime in 2040") was simply deleted in the Revised WMP. The only mention of the year 2040 in the Revised WMP is in the added section 5.4.14 ("The State of Bacteria"): "For bacteria, the existing Los Angeles River Bacteria TMDL is applicable. This results in a final wet and dry weather deadline of 2040, which extends beyond the 2026 deadline for the limiting pollutant zinc. If it is determined through the adaptive management process (e.g., due to future model simulations) 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 with a final deadline of 2040." This is unlikely to be the type of response that the Board was seeking through this comment. There are no milestones, based on measureable criteria or indicators, an explicit schedule, nor a final date.	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."	Section 5.4.14 was modified as directed by the Conditional Approval requirements, but these changes are still not responsive to original comment with its explicit request for "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 ". (Emphasis added)				

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RAA EVALUATION LETTER											
--	--	18	(A.1. "General comments")	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.	The Revised WMP now states "As expressed in the tables of Section 5.4, the Participating Agencies can meet the September 30, 2017, 10% milestone without structural controls." (p. 5-6) However, the revised tables so referenced offer no "support" whatsoever: for the 10% milestone, every one of them simply states "Nonstructural practices achieve 10% milestone". A bald assertion is not the same as providing additional support.	No additional requirement to address October 30, 2014 Board comment.	No change.				
--	--	19	(A.2. "General comments")	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.	See #5 above: a new column ("Milestones") has been added to Table 5-1, Nonstructural TCM Compliance Schedule, and a new section was added to the Revised WMP ("Approach to Implementing Structural Controls" in Section 5.3.2), with the following additions for schedule: <ul style="list-style-type: none"> For Right-of-Way BMP's: "Every two years the adaptive management process will include an assessment of the effectiveness of both 1) right-of-way BMPs incorporated into CIP projects and 2) the STP in contributing toward targeted load reductions." For Regional BMP's: "The preliminary site assessments and feasibility study will be completed by March 2016. Field analysis at selected sites will begin in December 2016." Near the end of this section, the following sentence has been added: "Even though not all projects can be specified and scheduled at this time, the Participating Agencies are committed to constructing the necessary regional and right-of-way BMPs to meet the determined load reductions per applicable compliance schedules." <p>The "measureable milestones for implementing each one of the proposed control measures" requested by the Board comments have not been provided.</p>	No additional requirement to address October 30, 2014 Board comment.	No change.				
--	--	20	(A.3. "General comments")	The LSGR WMP should include a more specific strategy to implement pollutant controls necessary to address this [bacteria] and other Category 2 pollutants prior to the second and third adaptive management cycles.	A new passage in the Revised WMP (Section 5.4.14) states "A bacteria TMDL has not been adopted for the Lower SGR Watershed. The RAA Guidelines state that in such an instance targets and critical conditions from other TMDLs in the region should be utilized. For bacteria, the existing Los Angeles River Bacteria TMDL is applicable." No other bacteria-specific control measures appear to have been added to the 2015 WMP. Thus, this issue does not appear to have been addressed.	No additional requirement to address October 30, 2014 Board comment.	No change.				
--	17	21	(B.1. "Modeling comments")	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 Draft and Revised WMP's RAA, the % error improves from -19.0% to -3.31%. There is no text change to explain this difference, nor any apparent differences in the graphed monthly hydrographs for observed and modeled flows.	No additional requirement to address October 30, 2014 Board comment.	No change.	"It should be noted that the entire watershed was included in the model for calibration purposes, including areas upstream and outside of the area addressed by the RAA. As such, there was no absence of upstream flow contributing to the error difference. As stated in the Regional Board comment, once calibration was completed, upstream areas were subtracted from the model for presenting load reduction targets. The plots in Attachment E were updated to show the daily calibration results. The Tables in Section 4.1.1 and 4.1.2 were updated to show the modeled versus observed volume error for the daily calibration results (versus the monthly that were shown previously)."		"The Group has clarified that upstream flows were taken into account in the RAA. Additionally, the Group has also clarified that the tables in Sections 4.1.1 and 4.1.2 have been updated to show the modeled versus observed volume error for the daily calibration results as opposed to the monthly calibration results used in the draft WMP."	It is unusual that calibration results improve when evaluated on shorter time steps, but the results are presumed correct. Note that nowhere in Section 4.1.1 is the time step specified.

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--	18	22	(B.2. "Modeling comments")	"...the predicted baseline concentrations and loads for all modeled pollutants of concern, including TSS, should be presented in summary tables for wet weather conditions."	A new set of tables and maps (Section 5.3.1 of the RAA) has been added to the Revised WMP that is responsive to this comment. Only 7 pollutants are shown, however.	No additional requirement to address October 30, 2014 Board comment.	No change.	"An additional table was added to the RAA to reflect the baseline loads. Found on page 39 as Table 5-6."		"Table 5-6 of the RAA (Appendix A-4-1, pg. 40) reflects baseline loads for organics, metals, and bacteria. Although TSS is not included, the sediment associated pollutants are included (DDT, PCB, and PAH)."	
22	19	23	(B.3. "Modeling comments")	"...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."	In the Revised RAA, a new section has been added: "Attachment F: Modeled Existing Versus Allowable Pollutant Loadings Plots". As suggested by the title, it provides the requested time series of loads, but not concentrations. No summaries, just time-series graphs, are provided. This is a partial response to one part of the Board's request.	No additional requirement to address October 30, 2014 Board comment.	No change.				
--	20	24	(B.4. "Modeling comments")	"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."	New results in Section 5.3.1 of the Revised RAA suggest that modeling has occurred for these pollutants.			"It should be noted that the original watershed modeling (based on LSPC) supporting the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL did not include simulation of DDT, PCBs, and PAHs. Rather, modeled sediment was used as a surrogate to estimate watershed loadings. Therefore, the 90th percentile of observed concentrations were assigned, meeting requirements set forth by RAA guidance provided by the Regional Water Quality Control Board."		"The Group has clarified that the Harbor Toxics TMDL did not directly model these pollutants, but instead used sediment as a surrogate. To establish baseline pollutant loading, the Group uses the 90th percentile of observed concentrations for DDT, PCBs, and PAHs."	

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--	21	25	(B.5. "Modeling comments")	<p>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.</p> <p>The report needs to present the same information, if available, for non-stormwater runoff.</p>	<p>A single sentence was added to Section 9-2 in response to one item in this comment: "The incremental column shows the total additional BMP volume required for each milestone while the cumulative measures the total BMP volume required by each milestone to hit the final compliance targets." No other change was made in the document in response to the comment.</p>	<p>No additional requirement to address October 30, 2014 Board comment.</p>	<p>No change.</p>	<p>"Regarding the required information for the modeled subbasins, Attachment B of the RAA was updated to include the requested tables, along with a sentence to provide some clarification in RAA Section 9.2.1 (third paragraph). Regarding non-stormwater runoff, the complete comment from the Regional Board is as follows: "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 recalibrated 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."</p> <p>A commitment to the recalibration alternative was included in WMP Section 4.2."</p>	<p>"Attachment B to the revised WMP includes detailed jurisdictional compliance tables that include runoff volumes, required volume reductions, and proposed volume reductions for each subwatershed. Language was added in section 9.2.1 of the RAA (Appendix, pg. 55) that clarifies the incremental and cumulative columns in Tables 9-4 through 9-7. Section 4.2 of the revised WMP commits to recalibrate the RAA based on data collected through the monitoring program (which includes the non-stormwater outfall screening and monitoring program)."</p>	<p>This commitment is stated as follows: "The Reasonable Assurance Analysis for the Lower Los Angeles River Watershed is included in Appendix A- 4-1. As data is collected through the monitoring program the model will be re-calibrated during the adaptive management process, which will allow for improved simulation of physical processes such as flow volumes and volume retention BMPs." Section 9 of the WMP, however ("Adaptive Management Process"), however, provides no clear assurances that such recalibration will occur. This "commitment" should be strengthened and made explicit.</p>	
--	22	26	(B.6. "Modeling comments")	<p>The report needs to present the same information [see above, comment B5], 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.</p>	<p>No change was made in the document in response to the comment.</p>	<p>No additional requirement to address October 30, 2014 Board comment.</p>	<p>No change.</p>				

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CONDITIONAL APPROVAL LETTER											
--	--	27				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.	Equivalent text was already present in Section 5.1.3.				
--	25	28				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 WMP will be responsible for meeting these milestone achievement dates.	Done.				
--	28	29				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.	One sentence has been added: "The nonstructural measures are summarized in Tables 3-2 and 3-5. "				
--	29	30				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.	Done.				
--	30	31				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.	Done.				

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--	1	1	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...the LA County MS4 Permit..."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.	Section 1.1 now paraphrases the above-stated goals of the Regional Board, and as in the Draft WMP further notes that "The ultimate goals of the WMP are listed in Section 1.2.3." However, no mention in either draft of the WMP includes the last concern of the Board, that "controls are implemented to reduce the discharge of pollutants to the maximum extent practicable (MEP) pursuant to Part IV.A.1."	No additional requirement to address October 28, 2014 Board comment.	No change.				
--	--	2	Part VI.C.5.a.iii.(l)(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.	There are no apparent changes to Section 2.2.	No additional requirement to address October 28, 2014 Board comment.	No change.				
--	--	3	Part VI.C.5.a.iii.(l)(a)(v) (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 October 2010 by Reach 1 and Compton Creek participating jurisdictions and Reach 2 participating jurisdictions should be included.	Section 2.3 Source Assessment was significant expanded.						
--	4	4	Part VI.C.5.a.iii.(l)(a)(vii) (Source Assessment)	The MS4 Permit requires a map of the MS4 including major outfalls and major structural controls...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.	This has been addressed in part as Figure 3-16 (Locations of Existing Structural BMPs; p. 3-56).						
5	--	5	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. ...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.	Citing a 2010 CDM report, section 3.4.1.3 now asserts "Specifically, the Reach 2 Implementation Plan indicates that the 2012 dry weather targets are currently being met and analyses of the Reach 2 watershed (which includes the Rio Hondo Spreading Grounds) indicates that the 2012 wet weather target is currently being met. With recent existing Reach 1 Regional Projects and the continued implementation of SUSMP/LID projects and nonstructural controls, the Group considers that the 2012 targets for Reach 1 have also been met." The assertion of release from obligations has been corrected in the Revised WMP.						

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--	5	6	Part VI.C.S.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."	Text has been added to p. 5-1: "Meeting the load reductions determined by the RAA results in an aggressive compliance schedule in terms of the technological, operational, and economic factors that affect the design, development, and implementation of the necessary control measures. Notably, as described in Chapter 6, there is currently no funding source to pay for these controls....As such the Group considers the compliance schedule to be as short as possible...."the aggressive schedule in place to target zinc provides an equally aggressive schedule to target the remaining WQPs, and as such it is considered to be as short as possible for all WQPs." This passage has interpreted the Board's requirement for ASAP compliance in strictly financial terms, with additional indeterminate delays added for acquisition and "conversion." There is no effort to show that compliance will occur "as soon as possible," only an assertion that it is considered to be so.	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. 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.	All requested wording changes were made for the Final WMP; however, none of the substantive requirements of the October 28, 2014 Board comments have been met.				
--	6	7	Part VI.C.S.b.iv.(S)(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...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.	The only changes to the Executive Summary of the RAA (Section 4.1) states that the RAA "determined that the metal zinc will be the primary or 'limiting' pollutant and that by implementing the structural and non-structural measures . . . to reduce zinc, the remaining pollutant goals will be achieved ...The rationale . . . is included Section 5.3.1 of the RAA (Appendix 4-1)" (see # 12 below). However, the request was for determining if "compliance with limitations for pollutants not addressed by TMDLs could be achieved in a shorter time frame " [emphasis added]. This comment has not been addressed.	No additional requirement to address October 28, 2014 Board comment.	No change.	"The introduction to Section 5 was modified to more clearly demonstrate that the compliance schedule is as soon as possible for pollutants not addressed by TMDLs."	The referenced modification in the Revised (and Final) WMP reads as follows: "Meeting the load reductions determined by the RAA results in an aggressive compliance schedule in terms of the technological, operational, and economic factors that affect the design, development, and implementation of the necessary control measures. Notably, as described in Chapter 6, there is currently no funding source to pay for these controls. Assuming finances are available, conversion of available land into a regional BMP is a protracted process that can take several years (not accounting acquisition, when required). As such the Group considers the compliance schedule to be as short as possible." This is not an analysis of non-TMDL pollutants but rather a discussion of how an absence of committed funding can impose indefinite delay on water-quality improvements. The problem may be genuine but the WMP remains non-responsive and offers no guidance on how to proceed.	"The revised WMP provides an estimate of the cost of structural BMPs and based on this estimated cost, reiterates the financial difficulties and uncertainties of implementing the WMP (particularly the lack of funding sources for controls), and concludes that the compliance schedule is as short as possible to allow time to both address technological and operational challenges and to secure the necessary funding to implement the watershed control measures in the WMP... The Group's existing strategy to control pollutants "as soon as possible" is sound. " [emphasis added]	No "strategy" is evident in the response.

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13	9			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.) [Note this condition requires less specificity than the analogous condition for LSGR.]	Section 5.3 now includes the introductory disclaimer, "Uncertainties associated with the structural controls complicate establishment of specific implementation dates. Despite this uncertainty the Group has made a diligent effort to provide a clear schedule of specific actions within the current and next permit terms in order to achieve target load reductions." Within each city's Pollutant Reduction Plan (Section 5.4), specific dates have been added to each year.			"Section 5 of the Revised (and Final) WMP was modified to increase the degree of clarity and specificity regarding schedules and actions for the current and next permit terms . The corrections to the Final WMP further refined these commitments. The Group has also addressed the inherent uncertainty as to which specific BMPs will be implemented to address the milestones in the RAA compliance tables (RAA Attachment B): Section 5.3 was revised to include a 2015-2016 schedule of feasibility studies and site assessments to determine specific projects."		"The Revised WMP provided more specificity in Section 5 regarding structural and non-structural best management practices (BMPs)...the Revised WMP did not contain definitive milestone dates, nor did it specify the Permittees responsible for the projects. The Executive Officer's approval letter included a condition that the Group add definitive dates for these LID BMPs...The Final WMP addresses this condition by including additional milestones and dates for their achievement."	
--	--			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.	Table 5-1 (Nonstructural TCM Compliance Schedule) has simply added the "ongoing" projects to the bottom of the prior list of planned projects, and added the label "Ongoing" in the column for Start date.						
--	8	8	Part VI.C.5.b.iv.(4)(d) (Watershed Control Measures - Milestones)	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.	Both the Draft and Revised WMP have the following text (without changes between versions): "Specific green streets projects were not investigated during this initial analysis for potential BMPs, therefore, the City-specific summary lists potential regional LID BMPs that <i>could</i> be used to achieve the required interim milestones and targets. Since this WMP is a planning-level document, over time the Watershed Group will report and demonstrate that the summative effect of projects implemented add up to the required reductions for interim milestones and final targets." <i>[emphasis in original]</i> Since this wording elicited the initial Board comment on the Draft WMP, its persistence in the Revised WMP is non-responsive. Section 5 was revised and now states: ""Uncertainties associated with the targeted nonstructural controls complicate establishment of specific implementation dates. Despite this uncertainty, the Group has made a diligent effort to provide a clear schedule of specific actions within the current and next permit terms in order to achieve target load reductions. In addition, the status of these controls will be included in the annual watershed reports as well as through the adaptive management process in order to assess their progress in attaining targeted load reductions." (p. 5-2) Thus, no commitment has been made beyond good intentions and a (mandated) willingness to track progress (or its lack thereof) through the permit cycle.	No additional requirement to address October 28, 2014 Board comment.	No change.	"The commitment language was included in the Revised (and Final) WMP in Section 5.3. Also included were modifications to increase the degree of clarity and specificity regarding schedules and actions for the current and next permit terms. Of particular note, WMP Section 5.3 was revised to include a 2015-2016 schedule of feasibility studies and site assessments to determine specific projects to address the milestones in the compliance tables of the RAA, Attachment B."	The one change in this section that includes new dates specifies, for regional BMP's only, that "preliminary site assessments and feasibility study will be completed by March 2016. Field analysis at selected sites will begin in December 2016." The text goes on to state, "Even though not all projects can be specified and scheduled at this time, the Participating Agencies are committed to constructing the necessary regional and right-of-way BMPs to meet the determined load reductions per applicable compliance schedules. Through implementation of the WMP and adaptive management there is the potential for the final compliance milestones to change." This final caveat raises some concern over the nature of "any such commitment."	"The Final WMP includes two new tables, Tables 5-2 and 5-3, which provide detail on the Permittees responsible for each LID BMP, and the deadlines and status for the project tasks (pgs. 5-4 to 5-5)...The Group has conveyed to Board staff that the information contained in Section 5 is the maximum practicable given uncertainties and that greater certainty will be provided through the adaptive management process."	Given the minimally defined state of the "Adaptive Management Process" (Section 9), greater future certainty is not guaranteed.

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--	12			The draft assumes a 10% pollutant reduction from new non-structural controls...additional support for this assumption should be provided, or...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.	The following passage was added to Section 4.3: "Currently there is insufficient information to accurately model the implementation of the controls listed in Section 3.2.3 through 3.4.1. These non-modeled controls were instead assigned a modest fraction of 10% for their cumulative load reduction. As part of the adaptive management process the Participating Agencies will evaluate this assumption during Program implementation and develop alternate controls if it becomes apparent that the assumption is not supported. However, despite the uncertainty surrounding the specific load reductions for these controls, there is support to suggest that the assumption is in fact a modest one." (p. 4-4)			"Section 4.3 was added to the Revised WMP to address the Regional Board comment. The Regional Board also states that,"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." This commitment was also included in Section 4.3."		"Section 4.3 also clarifies the support for the 10% pollutant reduction and commits to a reevaluation of the assumption: 'Agencies will evaluate this assumption during Program implementation and develop alternate controls if it becomes apparent that the assumption is not supported.'"	
--	13			For dry weather, the WMP assumes a 25% reduction in irrigation (which results in a 60% reduction in pollutant discharges). 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. milestones/deadlines...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.	A new section (4.2.1) was added to the 2015 WMP that summarized the results of 4 studies (1997, 1998, 2004, 2010) on reductions in residential water use, which suggest that 25% reduction is a plausible outcome. The referenced RAA section is only 1 page and was not changed between the 2014 and 2015 versions. The justification for 25% reductions is plausible, as current response to emergency drought measures have recently demonstrated, but it is hardly "conservative" (as stated in the text); it also presupposed implementation of actions that would lead to such an outcome. By using emergency drought regulations as an example of how public education can reduce water use, it begs the question of their applicability to sustainable, long-term reductions.	No additional requirement to address October 28, 2014 Board comment.	No change.				
--	14	9	Part VI.C.5.b.iv.(4)(b)-(c)	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...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 additional requirement to address October 28, 2014 Board comment.	No change.	"Though specific addresses were not provided in the WMP, these locations are still potential sites for regional structural BMPs and may be used as such. The complete list of potential sites in Section 3 of the WMP, including those where the address has been excluded for privacy, provide the necessary BMP volume needed as established through the RAA."		"The Group has indicated to Board staff that the complete list of potential sites — including the sites that were "excluded for privacy" — provide the necessary BMP volume, and that the "excluded for privacy" sites should be considered since they are still potential regional BMPs sites within the watershed...Since the Group's Pollution Reduction Plan is an "initial scenario" that may adapt over time by substituting BMPs that produce an equivalent volume reduction, the above information given by the Group is sufficient."	This response says "even though we required demonstration that non-excluded sites are sufficient to meet BMP volumes, we accept as sufficient the explanation that they are <i>not</i> sufficient." The purpose of the original comment is therefore unclear.
15	15			...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.	A substantial amount of new information was added to the RAA, although the organization (e.g., multiple "Attachment A" documents) make a clear understanding of their interrelationships difficult. A new "Attachment E: Minimum Control Measure Guidance" includes 10 pages on implementing an Industrial/Commercial Facilities Program, although the document explicitly "provides guidance" rather than stating a requirement of the WMP.						

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14	10	10	Part VI.C.5.b.iv.(4)(c) (Selection of Watershed Control Measures - SB 346 Copper Reductions)	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 additional requirement to address October 28, 2014 Board comment.	No change.	"As explained in a response table provided to the Regional Board along with the Revised WMP, a change to the document was not necessary. The RAA approach of controlling zinc, in concert with the modeled effect of copper load reductions anticipated through SB 346, anticipates that the application of the Watershed Control Measures and Compliance Schedule of Chapter 3 and 5, respectively, will reduce copper loads sufficiently to achieve compliance deadlines from interim and/or final WQBELs."	The response table was not available for review, but this response suggests that the Board's original judgment ("The draft WMP appears to rely mostly on the phase-out of copper in automotive brake pads...to achieve the necessary copper load reductions") was simply incorrect. If that is the present conclusion of the staff it should be clearly articulated as such.	"The RAA's approach of using zinc as a limiting pollutant, while anticipating copper reductions through Senate Bill 346 is an adequate approach to compliance with copper WQBELs. Therefore, no condition was included in the Executive Officer's approval letter to address this comment"	The basis of the staff's reversal of judgment from the first review is unclear.
--	7	11	Part VI.C.5.b.iv.(1)(a)(ii) Minimum Control Measures - Industrial/Commercial Facilities Program)	The revised WMP should ensure that any alternative prioritization method used by a City must also be based on water quality impact...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.	These changes have been made.						
9	11	12	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 I, 2, and 3 pollutant.	A microscopic change in wording has been made on p. 4-1 between the Draft and the Revised WMP. DRAFT: "The RAA has determined that the metal zinc will be the primary or "limiting" pollutant and that by implementing structural and non-structural measures to reduce zinc, the remaining pollutant goals will be achieved." REVISED: "The RAA has determined that the metal zinc will be the primary or "limiting" pollutant and that by implementing the structural and non-structural measures in Chapter 3 to reduce zinc, the remaining pollutant goals will be achieved for the Water Quality Priorities defined in Chapter 2. The rationale for this modeling approach is included Section 5.3.1 [sic] of the RAA (Appendix 4-1)." [Note the identical typo is present in the Lower San Gabriel River Revised WMP.] The request for explicit explanations for each pollutant has not been followed.	No additional requirement to address October 28, 2014 Board comment.	No change.	"Section 5.3.1of the RAA (WMP Appendix A-4) justifies how category 1,2, and 3 pollutants are controlled through the limiting pollutant approach. This statement, along with a reference to the RAA for justification, is included in Section 4.1. The revised introduction to Section 5 of the WMP provides explicit statements regarding the implementation of this approach in order to achieve applicable receiving water limitations."	The revised text of Section 5 states "This is true for all WQPs—by the nature of the limiting pollutant approach, it is expected that each of the remaining WQPs will be controlled at a faster rate than zinc." As such it is a definition of a limiting pollutant approach but nothing more.	"The Group has added additional clarification on its limiting pollutant approach in Section 5 (pg. 5-1) of the WMP and in Section 5.3.1 of the RAA (Appendix A-4-1, pg. 38). The revised WMP does not state and justify this approach for each category 1, 2, and 3 pollutant; however, this is not necessary given the Group's limiting pollutant approach."	Section 5.3 of the RAA notes "Overall findings of the study estimated that of the anthropogenic sources of copper, approximately 35 percent are attributed to brake pad releases (BPP 2010). Even if the reduction was only half of this amount, the adjustment to the required copper reduction would still result in zinc being the limiting pollutant in LLAR, LCC, and LSGR." Setting aside whether "only half" is a reasonable expectation for copper reductions from SB 346, it suggests that other pollutants might have similarly significant required reductions relative to zinc, but because they were not modeled this cannot be assumed. Simply asserting that zinc is limiting based on only a few constituents (and then redefining the term) does not constitute proof.

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--	--	13	Part VI.C.S.c.iii.(3) (Compliance Schedules Bacteria)	<p>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.</p> <p>Additional milestones and a schedule of dates for achieving milestones should be defined for addressing bacteria discharges to the LA River Estuary.</p>	<p>The Revised WMP was completely nonresponsive to this comment, adding only a single "additional" milestone that did nothing to address the issue being raised: "Achieve final WQBELS or demonstrate that noncompliance is due to upstream contributions and submit report to Regional Water Board", also with a due date of September 23, 2030.</p>	<p>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:</p> <p>a. Revise "Submit LRS to Regional Board" deadline to April 28, 2017.</p> <p>b. Revise "Complete Implementation of LRS" deadline to October 28, 2021.</p> <p>c. Revise deadlines for the achievement of interim or final dry-weather WQBELS to October 28, 2024.</p> <p>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.</p>	<p>The requested wording changes and dates were inserted verbatim.</p>				
RAA EVALUATION LETTER											
--	--	14	(A.1. "General comments")	<p>To the extent that discharges to the Los Angeles River Estuary are to be addressed by the LLAR WMP...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 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.</p>	<p>The section on the Dominguez Channel And Greater Los Angeles And Long Beach Harbor Waters Toxic Pollutants TMDL (Section 3.4.1.6) is unchanged between the Draft and Revised WMP. The text [judged inadequate by the Boards comment] continues to read as follows:</p> <p>"The Watershed Control Measures described in this chapter will provide reasonable assurance that the Lower LAR Agencies are addressing the TMDL pollutants of concern in their discharges and conducting activities to support the achievement of WQBELS. Monitoring conducted through the CIMP along with an Annual Report of Implementation will document the Lower LAR Watershed Group's progress. In addition, the sediment management efforts in the LAR Estuary will likely achieve significant contaminant reduction." (p. 3-30, both versions)</p>	<p>No additional requirement to address October 28, 2014 Board comment.</p>	<p>No change.</p>	<p>"The Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutant TMDL was addressed in the Draft (and Final) WM P (Section 3.4.1.6). The RAA concludes that the WQBELS of this TMDL are not "limiting", as defined by the limiting pollutant approach which is also justified and explained in the RAA. Zinc was predicted to be the limiting pollutant, and following the strategies and compliance schedules of the WMP (Chapters 3 and 5, respectively), targeting load reductions to achieve zinc WQBELS will simultaneously result in load reduction to achieve the WQBELS of the Toxics TMDL."</p>	<p>"On pgs. 38-39 of Appendix 4, A-4-1, Reasonable Assurance Analysis, the Group demonstrates that their limiting pollutant approach takes into account the Harbor Toxics TMDL by evaluating DDT, PCB, and PAHs in its RAA. The Group states that implementing control measures that control zinc will achieve the load reductions required to achieve the water quality based effluent limitations (WQBELS) of the Harbor Toxics TMDL. This is a reasonable assumption and consistent with the Harbors Toxics TMDL, in which the Board acknowledges that implementation of other TMDLs in the watershed may contribute to the implementation of the Harbors Toxics TMDL."</p>	<p>Footnotes to the tables on p. 38-39 of the RAA acknowledges that "Organic load reductions above influenced by assigned concentrations at half the MDLs (monitoring data below MDLs), and therefore are suspect and not considered limiting." This is a reasonable assumption but should be highlighted more prominently lest the "suspect" data prove to be too low rather than too high.</p>	
--	--	15	(A.2. "General comments")	<p>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.</p>	<p>San Pedro bay is reference only once in both the Draft and Revised WMP (Section 3.4.1.6) without change. The requested revision was ignored.</p>	<p>No additional requirement to address October 28, 2014 Board comment.</p>	<p>No change.</p>	<p>"MS4 discharges directly to San Pedro Bay will be addressed in the WMP developed by the City of Long Beach as required by the Long Beach MS4 NPDES Permit."</p>	<p>"The Group explained to Board staff that discharges to San Pedro Bay will be addressed by the City of Long Beach's WMP, which is currently under review by Board staff."</p>	<p>Information not previously available.</p>	

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--	--	16	(A.3. "General comments")	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.	Section 5.3.1 has been nominally revised, but only to the extent that 2017 dates now read "September 30, 2017 ", and 2024 dates now read "January 11, 2024". No "additional milestones and dates for their achievement" have been provided.	No additional requirement to address October 28, 2014 Board comment.	No change.				
--	21	17	(B.1. "Modeling comments")	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.	Between the 2014 and 2015 RAA's, the % error improves from 11.88% to 8.72%. There is no text change to explain this difference, nor any apparent differences in the graphed monthly hydrographs for observed and modeled flows.	No additional requirement to address October 28, 2014 Board comment.	No change.				
--	22	18	(B.2. "Modeling comments")	"...the predicted baseline concentrations and loads for all modeled pollutants of concern, including TSS, should be presented in summary tables for wet weather conditions."	A new set of tables and maps (Section 5.3.1 of the RAA) has been added to the Revised WMP that is responsive to this comment. Only 7 pollutants are shown, however.	No additional requirement to address October 28, 2014 Board comment.	No change.	"An additional table was added to the RAA to reflect the baseline loads. Found on page 39 as Table 5-6."		"Table 5-6 of the RAA (Appendix A-4-1, pg. 40) reflects baseline loads for organics, metals, and bacteria. Although TSS is not included, the sediment associated pollutants are included (DDT, PCB, and PAH)."	
22	23	19	(B.3. "Modeling comments")	...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.	In the Revised RAA, a new section has been added: "Attachment F: Modeled Existing Versus Allowable Pollutant Loadings Plots". As suggested by the title, it provides the requested time series of loads, but not concentrations. No summaries, just time-series graphs, are provided. This is a partial response to one part of the Board's request.	No additional requirement to address October 28, 2014 Board comment.	No change.				
--	24	20	(B.4. "Modeling comments")	"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."	New results in Section 5.3.1 of the Revised RAA suggest that modeling has occurred for these pollutants.			"It should be noted that the original watershed modeling (based on LSPC) supporting the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL did not include simulation of DDT, PCBs, and PAHs. Rather, modeled sediment was used as a surrogate to estimate watershed loadings. Therefore, the 90th percentile of observed concentrations were assigned, meeting requirements set forth by RAA guidance provided by the Regional Water Quality Control Board."		"The Group has clarified that the Harbor Toxics TMDL did not directly model these pollutants, but instead used sediment as a surrogate. To establish baseline pollutant loading, the Group uses the 90th percentile of observed concentrations for DDT, PCBs, and PAHs."	

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--	25	21	(B.5. "Modeling comments")	<p>"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 tables 9-4 through 9-7 and how these values were derived from previous tables.</p> <p>"The report needs to present the same information, if available, for non-stormwater runoff."</p>	<p>A single sentence was added to Section 9-2 in response to one item in this comment: "The incremental column shows the total additional BMP volume required for each milestone while the cumulative measures the total BMP volume required by each milestone to hit the final compliance targets." No other change was made in the document in response to the comment.</p>	<p>No additional requirement to address October 28, 2014 Board comment.</p>	<p>No change.</p>	<p>"Regarding the required information for the modeled subbasins, Attachment B of the RAA was updated to include the requested tables, along with a sentence to provide some clarification in RAA Section 9.2.1 (third paragraph). Regarding non-stormwater runoff, the complete comment from the Regional Board is as follows: "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 recalibrated 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."</p> <p>A commitment to the recalibration alternative was included in WMP Section 4.2."</p>	<p>"Attachment B to the revised WMP includes detailed jurisdictional compliance tables that include runoff volumes, required volume reductions, and proposed volume reductions for each subwatershed. Language was added in section 9.2.1 of the RAA (Appendix, pg. 55) that clarifies the incremental and cumulative columns in Tables 9-4 through 9-7. Section 4.2 of the revised WMP commits to re-calibrate the RAA based on data collected through the monitoring program (which includes the non-stormwater outfall screening and monitoring program)."</p>	<p>This commitment is stated as follows: "The Reasonable Assurance Analysis for the Lower Los Angeles River Watershed is included in Appendix A- 4-1. As data is collected through the monitoring program the model will be re-calibrated during the adaptive management process, which will allow for improved simulation of physical processes such as flow volumes and volume retention BMPs." Section 9 of the WMP, however ("Adaptive Management Process"), however, provides no clear assurances that such recalibration will occur. This "commitment" should be strengthened and made explicit.</p>	
--	26	22	(B.6. "Modeling comments")	<p>The report needs to present the same information [see above, comment B5], 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.</p>	<p>No change was made in the document in response to the comment.</p>	<p>No additional requirement to address October 28, 2014 Board comment.</p>	<p>No change.</p>				
CONDITIONAL APPROVAL LETTER											
--		23				<p>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.</p>	<p>Table 3-8 is now reproduced as Table 5-4 (see #13 above).</p>				
--		24				<p>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.</p>	<p>These changes have been made.</p>				

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--	28	25				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.	Done.				
--		26				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).	Done.				
--		27				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.	Done.				
--	29	28				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.	The only change in this section is the added sentence, "The nonstructural measures are summarized in Tables 3-2 and 3-11."				
--	30	29				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.	Done.				
--	31	30				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.	Done.				