Attachment

The following attachment provides an exhaustive inventory of the issues raised by stakeholders in response to the Regional Board's data solicitation in fall 2008. Board staff reviewed each submittal and then grouped individual issues into 24 general categories (e.g., issues related to REC-1 and REC-2 beneficial use designations; issues related to bacteria objectives and their implementation; issues related to atmospheric deposition; etc.). In some cases, an individual issue may seem to fall within several categories; Board staff have placed it in the category that seemed most closely aligned with the issue.

The first page of the attachment lists the categories and the number of commenters who provided input for each. The subsequent pages of the attachment provide a listing of every issue by category.

The issues are presented within five columns. The first column, "Will issue be addressed by another program", is self explanatory. The second column, "Basin Plan Category", indicates where in the Basin Plan the issue would be addressed. The third column, "General Issue", identifies what the Board is being asked to do to address the issue. The fourth column, "Specific Issue", is also self explanatory. The last column, "Commenter", identifies the commenters who raised the issue.

Issue Category	No. of Commenters	Pages
Beneficial Uses		
General beneficial use issues	22	3 - 5
Potential Uses	24	6 - 7
Specific beneficial use issues	22	8 - 11
REC 1 and REC 2	43	12 - 17
Flood control beneficial use/waterbody type	28	18 - 19
EDW beneficial use/waterbody type	14	20
Water Quality Objectives		
General water quality objectives	5	21
Specific water quality objectives	21	22 - 27
Bacteria objectives	36	28 - 34
Stormwater & water quality standards	28	35 - 38
Natural loading	23	39 - 42
Site specific objectives	16	43 to 44
Applicability of CTR to stormwater	15	45
Atmospheric deposition	5	46 - 47
Implementation		
General implementation	27	48 - 50
Consideration of 13241 factors / economics	41	51 - 57
TMDL issues	32	58 - 63
Tributary rule	23	64 - 65
Administrative updates and mapping	20	66 - 70
Stormwater implementation	17	71 - 73
Design storm criteria	17	74 - 76
NPDES permitting	13	77
Natural events	6	78
Reclaimed/recycled water and stormwater reuse	6	79 - 80

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Uses	Address competing beneficial uses	Address potential competing beneficial uses such as water contact recreation and aquatic and wildlife habitat.	
	Beneficial Uses	Develop criteria for beneficial use designations	Include clear, rational criteria relating to the development of future beneficial use designations. Develop and implement through a collaborative process whereby the local stakeholders and responsible agencies for each water body are stakeholders.	San Gabriel River Management/SGRMAC & City of Pomona/City of Calabasas
	Beneficial Uses	Develop criteria for beneficial use designations	Develop guidelines for the designation of beneficial uses.	Los Angeles County DPW
	Beneficial Uses	Develop criteria for beneficial use designations	Develop clear, rational criteria for creating and applying beneficial use designations.	City of Arcadia
	Beneficial Uses	Develop criteria for beneficial use designations	Establish definition and criteria to designate an 'existing use'.	Executive Advisory Committee
	Beneficial Uses	Develop protocol for conducting use attainability analysis	Develop protocol to ensure consistency in conducting use attainability analyses and establish criteria for how the results will be evaluated. Conduct use attainability analyses, in collaboration with stakeholders, for waterbodies in the region	Los Angeles County DPW
	Beneficial Uses	Protect beneficial uses	Assess all the beneficial uses in the Santa Clara River watershed to ensure the area is receiving the full range of protection	Santa Clarita Organization for Planning and the Environment
	Beneficial Uses	Re-evaluate beneficial use designations	Re-evaluate the designation of all "existing" uses by conducting Use Attainability Analyses	Los Angeles County DPW

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Uses	Re-evaluate beneficial use designations	Study the propriety of all the "existing" use designations in the Basin Plan, in accordance with applicable federal regulations and State law requirements	City of Signal Hill/City of Downey
	Beneficial Uses - Tiered	Develop criteria for beneficial use designations	Develop clear guidelines for the designation of beneficial uses, taking into consideration tiered uses and use attainability and re-evaluate all beneficial uses currently designated as "existing".	Los Angeles County DPW
	Beneficial Uses - Tiered	Develop criteria for beneficial use designations	Develop and apply the principle of "tiered" approach for use designations and for setting expectations/targets	Los Angeles County DPW
	Beneficial Uses - Tiered	Develop criteria for beneficial use designations	Complete the tiered aquatic life use (TALU) study that has been initiated as part of the 2004 Triennial Review	Los Angeles County DPW
	Beneficial Uses - Tiered	Develop criteria for beneficial use designations	Develop clear rational criteria for creating and applying beneficial use designations. These criteria should direct the completion of use attainability analyses as necessary to support seasonal and/or tiered use designations.	Construction Industry Coalition on Water Quality (CICWQ)/City of Agoura Hills/ City of Westlake/EAC et al.
	Beneficial Uses - Tiered	Develop criteria for beneficial use designations	Develop criteria for creating and applying beneficial use designations, including the possible adoption of seasonal and/or tiered use designations.	La Verne/Monterey Park

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Uses - Tiered	Re-evaluate beneficial use designations	Employ a tiered aquatic life use ("TALU") structure to apply more suitable beneficial use designations to protect upper reaches of streams that are hydrologically connected to lower reaches that support fish and aquatic invertebrates. Lower reaches of ephemeral streams (i.e. those between SSFL and the Los Angeles River, including Bell Creek, Dayton Canyon Creek, and other tributaries to the Los Angeles River, and between SSFL and Calleguas Creek, including tributaries to Calleguas Creek such as Arroyo Simi and Arroyo Las Posas) may currently support WILD and/or WARM beneficial uses.	The Boeing Company

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Uses - Potential	Develop criteria for beneficial use designations	Develop clear rational criteria for creating and applying beneficial use designations, including the revision of current Basin Plan "potential" use designations.	Construction Industry Coalition on Water Quality/EAC et al./La Verne/Monterey Park
	Beneficial Uses - Potential	Develop criteria for probable "future use" designations	Establish definition and criteria to designate a probable future use	City of Agoura Hills/ City of Westlake/Executive Advisory Committee
	Beneficial uses - Potential	Re-evaluate beneficial use designations	Re-evaluate designated uses to reflect actual, potential, or "probable" uses	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes/City of Carson
	Beneficial Uses - Potential	Re-evaluate potential use designations	Complete use attainability analyses (UAAs) based on criteria for creating and applying beneficial use designations to evaluate which areas truly have beneficial uses and not simply potential beneficial uses that will never be functional for the community.	City of Arcadia
	Beneficial uses - Potential	Re-evaluate potential use designations	Evaluate all "P" potential use designations in Basin Plan, and either eliminate the designation or make a 'probable future' designation.	City of Agoura Hills/Executive Advisory Committee/City of Agoura Hills/ City of Westlake
	Beneficial uses - Potential	Re-evaluate potential use designations	Review and delete all "potential" use designations presently in the Basin Plan	Rutan & Tucker
	Beneficial uses - Potential	Re-evaluate potential use designations	Remove all potential use designations	Irwindale
	Beneficial uses - Potential	Re-evaluate potential use designations	Produce a document of all TMDLs that include potential uses, which will need to be revised based on the court mandate.	Irwindale
	Beneficial uses - Potential	Re-evaluate potential use designations	Modify "Potential" Beneficial Use Designations where appropriate	Heal the Bay et al.

Will Issue be addressed by another program? Basin Plan Category General Issue	Specific Issue	Commenter
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Heal the Bay et al. includes: Heal the Bay, Santa Monica BayKeeper, Natural Resources Defense Council

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Uses	Evaluate impacts to beneficial uses	Address and redress the impacts of over-pumping on ephemeral streams and ponds in the Santa Clara River watershed	Santa Clarita Organization for Planning and the Environment
	Beneficial Uses	Evaluate impacts to beneficial uses	Address the problem of elimination of riparian wildlife corridors in the Santa Clara River watershed	
	Beneficial Uses	Evaluate impacts to beneficial uses	Address the issue of protecting ground water recharge areas for local self-sufficiency in the Santa Clara River watershed	Santa Clarita Organization for Planning and the Environment
	Beneficial Uses	Evaluate impacts to beneficial uses	Address the placement of new water wells in the Santa Clara River and its tributaries without obtaining permits as required from the State Water Resources Control Board	Santa Clarita Organization for Planning and the Environment
	Beneficial Uses	Re-evaluate beneficial use designations	Carefully consider the beneficial use designations of ephemeral reaches of streams between SSFL and the Los Angeles River, including Bell Creek, Dayton Canyon Creek, and other tributaries to the Los Angeles River, and between SSFL and Calleguas Creek, including tributaries to Calleguas Creek such as Arroyo Simi and Arroyo Las Posas. All of these reaches are currently designated WILD and/or WARM even though they have water flowing in them only after significant storm events.	

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Uses	Re-evaluate beneficial use designations	Review unrealistic beneficial uses. The groundwater recharge beneficial use of Reach 1 of the Los Angeles River is questionable since reach 1 is concrete lined to the point where it is tidally influenced after which point the water is too brackish to be used for ground water recharge	Signal Hill Petroleum
	Beneficial Uses	Re-evaluate beneficial use designations	Reassess the MUN, IND, and GWR beneficial uses of Compton Creek and Los Angeles River Reach 2.	City of South Gate
	Beneficial Uses	Re-evaluate beneficial use designations	Specifically evaluate the following designations: Ground Water Recharge "GWR" for Los Angeles River Reach 1 (Estuary to Carson Street), Industrial Service Supply "IND" for LAR Reach 1	City of Signal Hill
SCCWRP Contract to Develop and Apply Criteria for Protecting SHELL Use.	Beneficial Uses	Re-evaluate beneficial use designations	Hold one or more public workshops to scope beneficial uses, in particular WARM, and SHELL.	Irwindale

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Uses	Re-evaluate beneficial use designations	The Basin Plan currently lists GWR as a beneficial use for reaches of the lower Rio Hondo, Los Angeles and San Gabriel River. Many of these areas are concrete lined and convey mostly treated excess POTW effluent, in excess of what is allowed for recharge, to marine receiving waters. It would therefore be prohibited, at least in some of these areas, for recharge to be occurring and the potential for future recharge through the concrete lining is minimal.	City of Downey
	Beneficial Uses	Re-evaluate beneficial use designations	Clarify the application of Sources of Drinking Water Policy. Many of the channels monitored are tidally influenced, and are not appropriate existing or potential sources of drinking water.	City of Oxnard
	Beneficial Uses	Re-evaluate beneficial use designations	Throughout the region, many Industrial Service Supply users no longer use receiving waters such as the Rio Hondo, LAR and SGR as source waters due to increasingly strict environmental regulations and increasingly plentiful reclaimed water sources. Unless there exist industrial users, this use should be deleted from the Basin Plan or, at least, limited to those areas upstream of such water consumers.	City of Downey
	Beneficial Uses	Re-evaluate beneficial use designations	evaluate MUN and Potential MUN beneficial use designations.	City of Thousand Oaks/ City of Monterey Park

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
SCCWRP Contract to Develop and Apply Criteria for Protecting SHELL Use.	Beneficial Uses	Re-evaluate beneficial use designations	Re-evaluate WARM and SHELL beneficial uses where such uses do not and cannot exist	City of Carson/City of Commerce/City of Duarte/City of Gardena/City of Glendora/City of South El Monte/City of Whittier
	Beneficial Uses	Revise beneficial use designations	Revise all segments and basins below 1000ft and above 10ft elevation to MUN and GWR without conditions or constraints.	The Sierra Club Angeles Chapter
	Beneficial Uses	Revise beneficial use designations	Dedesignate the MUN, PROC, GWR, FRSH, and AGR beneficial uses for the groundwater underlying the Westside Project Area in Long Beach	Targhee Inc. for City of Long Beach
Beneficial Uses Hydromodification	Beneficial Uses	Revise beneficial use designations	Clarify/expand the scope of beneficial uses to cover facilities that are themselves beneficial uses e.g. Seaside Lagoon.	Gary Ohst - private citizen
	Hydromodification	Evaluate impacts to beneficial uses	Examine the cumulative loss of groundwater recharge (that results) from hardscaping tributaries	Santa Clarita Organization for Planning and the Environment
	Hydromodification	Evaluate impacts to beneficial uses	Include the cumulative impacts of hardscaping tributaries on other beneficial uses such as habitat, in the Basin Plan	Santa Clarita Organization for Planning and the Environment

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use definition	Revise definition of REC 1 to reflect intent of EPA, by replacing "reasonably possible" with "likely", and by removing fishing from the definition of REC 1.	City of Los Angeles
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use definition	Evaluate Basin Plan Definitions of Recreational Uses and Revise the Basin Plan definition of REC-1 to be consistent with EPA guidance	City of Ventura/ Ventura County Stormwater Program
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designation	De-designate water bodies or reaches that cannot support REC 1 uses due to physical characteristics of the water body.	City of Los Angeles
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designation	Subcategorize, modify, or clarify the REC1 beneficial use designation to distinguish between waterbodies where full body immersion takes place and waterbodies with more limited body contact recreation.	City of Los Angeles/ Ventura County Public Works Agency
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designation	If supported by the result of a UAA, remove the REC-1 beneficial uses designated as "existing" for engineered flood protection channels	City of Bellflower/ Los Angeles County DPW
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designations	Re-evaluate the REC-1 designation for the San Gabriel River reach 1 (given that access is prohibited)	City of Bellflower
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designations	Re-evaluate the REC-1 designations of Coyote Creek and the San Gabriel River	City of Artesia/City of Cerritos

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designations	Conduct Use Attainability Analyses to assess the appropriateness of REC-1 beneficial uses designated as "existing" for engineered flood control channels in which body contact recreational use is inappropriate, including specifically those areas where the footnotes indicate that there is limited public access or access is prohibited.	City of Bellflower/Los Angeles County DPW
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designations	Eliminate REC-1 from those receiving water segments where such uses have been made impossible, for example, their primary use as flood control channels, which are generally off-limits to the public.	
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designations	Consider de-designating the REC1 use for waterbodies, or sections of waterbodies, that cannot support REC 1 uses due to their physical characteristics	City of Ventura/Ventura County Stormwater Program
	Beneficial Use REC-1	Re-evaluate REC-1 beneficial use designations	Reassess the use and application of the "Water Contact Recreation", or "REC-1," beneficial use category, to reflect actual, potential, or probable use.	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes/ City of Carson /Artesia/Cerritos/ Downey /Hawaiian Gardens/Hidden Hills
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses definitions	Clarify REC-1, REC-2 definitions and designations. The definitions for these beneficial uses are not clear or distinct from each other. Both definitions include clauses that include "where ingestion of water is reasonably possible".	City of Thousand Oaks

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Remove REC use designations where contact is not reasonably probable.	Executive Advisory Committee
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Re-evaluate the REC-1 and REC-2 designations for Dominguez Channel to Estuary (given that it is not accessible)	City of Carson
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Compton Creek should not be designated REC1 and REC2	City of Carson
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	The Basin Plan lists REC-1 and REC- 2 as existing beneficial uses for the Rio Hondo, LAR and SGR in drainage channel areas that are restricted from public access and in fact are dangerous due to high velocity flows of effluent in smooth wall low flow conveyances.	City of Downey
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Assess the appropriateness of Basin Plan recreational (REC-1 and REC- 2) beneficial use designations, especially for artificial drainage channels in highly urbanized areas. Evaluate the establishment of seasonal and tiered-use designations.	City of Alhambra
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Assess the appropriateness of recreational (REC-1 and REC-2) beneficial use designations in artificial or improved drainage channels, especially channels where public access is restricted	Ventura County Watershed Protection Division
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Assess the appropriateness of Basin Plan recreational (REC-1 and REC- 2) beneficial use designations, particularly in highly urbanized areas dominated by artificial drainage channels.	EAC et al.

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Establish criteria for the designation of REC-1 and REC-2 beneficial uses (i.e., based upon channel type, amount of flow, etc.)	City of Calabasas/Executive Advisory Committee
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Revise beneficial uses of certain reaches in EDW or flood control channels that are not readily conducive to REC-1 and REC-2 uses based on channel attributes, accessibility, and amount of flow. Establish priorities for implementation based upon level of use/exposure/risk. Evaluate REC-1 and REC-2 designations for those channels for which a request has been made. Establish fact sheets laying out available evidence for each water body and clarifying reasons for each designation.	City of Calabasas/Executive Advisory Committee
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Hold one or more public workshops to scope beneficial uses, in particular REC-1, REC-2.	Irwindale
	REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Reassess the REC beneficial uses of Compton Creek and Los Angeles River Reach 2.	City of South Gate
	Beneficial Use REC-1 & REC-2	Re-evaluate REC-1 and REC-2 beneficial uses designations	Specifically evaluate the following designations: Water Contact Recreation "REC-1" & Non-Contact Recreation "REC-2" for LAR Reach 1 and the Los Cerritos Channel	City of Signal Hill
	Beneficial Use REC-2	Re-evaluate REC-2 beneficial use definition	Evaluate Basin Plan Definitions of Recreational Uses and Revise the Basin Plan definitions of REC2 to be consistent with EPA guidance	City of Ventura/Ventura Countywide Stormwater Program

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Use REC-2	Re-evaluate REC-2 beneficial use definition	Revise definition of REC 2 to include activities involving proximity to water, but not normally involving body contact with water and where ingestion is not likely.	City of Los Angeles
	Beneficial Use REC-2	Re-evaluate REC-2 beneficial use designation	Reassess the use and application of the "Non Contact Water Recreation", or "REC-2," beneficial use category, to reflect actual, potential, or probable use.	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes/City of Carson /Artesia/ Cerritos/ Downey/ Hawaiian Gardens/ Hidden Hills
	Beneficial Use REC-2	Re-evaluate REC-2 beneficial use designations	Designate REC-2 only where incidental contact is reasonably probable.	Executive Advisory Committee
	Beneficial Use REC-2	Re-evaluate REC-2 beneficial use designations	Eliminate REC-2 from those receiving water segments where such uses have been made impossible, for example, their primary use as flood control channels, which are generally off-limits to the public.	
	High Flow Suspension	Amend application of REC-1 and REC-2 beneficial uses designations	Suspend REC 1 and REC 2 during high flow conditions in the Los Angeles River and its tributaries.	City of Los Angeles
	High Flow Suspension	Amend application of REC-1 and REC-2 beneficial uses designations	Develop criteria for designating high flow conditions that would trigger suspension of the REC-1 and REC-2 bacterial indicator water quality objectives in waterbodies other than those with concrete-lined channels.	City of Ventura/Ventura Countywide Stormwater Program
	High-Flow Suspension	Amend application of REC-1 and REC-2 beneficial uses designations	Pending the conduct of a Use Attainability Analysis, amend Resolution No. 2003-010 to modify the definition of "significant storm event" to take into account actual safety considerations.	Los Angeles County DPW

REC 1 and REC 2 Related Issues

Will Issue be addressed by another program?	Category General Issue	Specific Issue	Commenter
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Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial use - Flood Control Function	Develop and adopt a "flood control" beneficial use designation	Develop and adopt a category or designation for flood control purposes to account for the actual regional use of storm water conveyance systems except for those limited areas where the actual or probable contact for recreation would occur	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes/City of Carson
	Beneficial use - Flood Control Function	Develop and adopt a "flood control" beneficial use designation	Establish flood control as a bona fide beneficial use.	City of Claremont/ City of Inglewood/City of San Dimas/ Cerritos/Downey/Hawaiian Gardens/Hidden Hills/Irwindale/La Verne/Monterey Park
	Beneficial use - Flood Control Function	Develop and adopt a "flood control" beneficial use designation	Consider either a new waterbody category or beneficial use designation for waterbodies with a flood control function	La Verne/Monterey Park/Executive Advisory Committee
	Beneficial use - Flood Control Function	Develop and adopt a "flood control" beneficial use designation	Consider the need for new waterbody categories or beneficial use designations for these types of water ways that restrict public access and lack natural stream features	City of Alhambra
	Beneficial use - Flood Control Function	Develop and adopt a "flood control" beneficial use designation	Recognize that Public Safety and Flood Protection are a Beneficial Use.	City of Thousand Oaks
	Beneficial use - Flood Control Function	Evaluate the appropriateness of beneficial use designations for flood control channels	Consider the appropriateness of beneficial use designations for flood control channels.	EAC et al./La Verne/ Monterey Park/ Alhambra
	Beneficial use - Flood Control Function	Reconcile flood control function with existing beneficial uses	Provide clarification that flood control use will be primary to other uses at certain times (e.g. during wet weather storm flow conditions).	Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial use - Flood Control Function	Reconcile flood control function with existing beneficial uses	The Basin Plan should be used to reconcile the difficulties of using a system of flood control, designed to protect life and property, with the new goal of using the system to improve water quality. Consideration should be given (in the Basin Plan) to the fact that plans and funding resources do not exist to return many of the concrete lined flood control channels to natural water bodies and such planning and funding may take decades to achieve, if even possible.	
	Beneficial use - Flood Control Function	Reconcile flood control function with existing beneficial uses	Recognize flood protection and public safety as necessary uses of waterbodies and develop a policy for addressing incompatibilities between waterbody beneficial uses	Ventura Countywide Stormwater Program

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Beneficial Use - EDW		Consider either a new water body category or beneficial use designation for effluent-dominated waters.	EAC et al./La Verne/Monterey Park/Alhambra
	Beneficial Use - EDW	beneficial use designations for	Consider the appropriateness of beneficial use designations for effluent-dominated waters.	EAC et al./La Verne/Monterey Park/Alhambra
	WQOs - EDW		Update current plan objectives to reflect conditions relevant and appropriate for Effluent Dominated and Dependent Waters.	City of Thousand Oaks

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	• •	Review/reasses water quality objectives	Review water quality objectives and standards and make certain that they have scientific validity	City of Arcadia
		Review/reasses water quality objectives	Review and update all water quality objectives. A review should include floatables.	City of South Gate
		Review/reasses water quality objectives		Hawaiian Gardens/La Verne/Monterey Park

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
TMDL; Watershed Regulatory; State Policy	Water Quality Objectives	Clarify application of mineral objectives	Modify the Basin Plan to specify how mineral objectives are implemented, particularly as it relates to the setting of targets for Total Maximum Daily Loads (TMDLs) and the setting of NPDES effluent limits, waste discharge requirements, and water recycling requirements.	County Sanitation Districts
	Water Quality Objectives	Clarify application of mineral objectives	Revise Basin Plan to specify that mineral quality objectives are to be interpreted and applied using a flow- weighted annual average (instead of instantaneous). Clarify that mineral quality objectives are only to be applied to storm water after consideration of an appropriate averaging period (as specified above) and only when necessary to protect a downstream beneficial use that actually occurs during a storm condition.	Executive Advisory Committee
	Water Quality Objectives	Clarify application of MUN objectives	Clarify the application of drinking water MCLs (maximum contaminant levels), Title 22 requirements and treatment requirements to storm flows, permitted discharges, etc. MCLs for specific constituents should not be applied if treatment of water prior to delivery as drinking water would reduce concentrations to appropriate levels. MCLs should not be applied to waters that will not recharge groundwater or be used for MUN purposes.	Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Water Quality Objectives	Clarify application of MUN objectives	Update tables 3-5, 3-6, 3-7, and 3-9 to note that MCLs are to be applied as water quality objectives only in cases where conventional drinking water treatment systems cannot reasonably control the constituent of concern in the source waters to the MCL before it reaches the customer's tap. Also, when used, specify that MCLs should be applied as annual averages and attenuation in the soil should be factored into the objective.	City of Los Angeles
	Water Quality Objectives	Clarify application of MUN objectives	Change Objectives for concentrations of chemical constituents in waters designated as MUN to specify that the objectives apply on same averaging basis as MCLs	County Sanitation Districts
	Water Quality Objectives	Clarify application of objectives	Clarify which constituents are attenuated by filtration through soils, and modify WQO to recognize attenuation/treatment that occurs as water flows through soils. Implement GWR objectives as annual flow- weighted average concentrations.	Executive Advisory Committee
State Board	Water Quality Objectives	Clarify application of objectives	Incorporate an approach for determining appropriate hardness values for use in calculating water quality objectives for hardness dependent metals.	City of Los Angeles

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Water Quality Objectives	Clarify application of objectives	Develop implementation provisions that specify how to determine natural conditions and deviations from natural conditions with regard to waste discharges when applying the temperature objective. Consider use of maximum observed temperature values as objectives in urbanized, highly modified systems.	City of Los Angeles
	Water Quality Objectives	Clarify application of objectives	Develop appropriate methods for interpreting water quality objectives that relate to "natural conditions," such as temperature and pH	EAC et al./La Verne/Monterey Park
	Water Quality Objectives	Develop translators for narrative standards	Develop clear translators for narrative standards to indicate how these criteria will be interpreted for use in	Construction Industry Coalition on Water Quality (CICWQ)/ EAC et al./ City of La Verne and City of Monterey Park
	Water Quality Objectives	Develop/ adopt new water quality objective		Heal the Bay et al.
	Water Quality Objectives	Develop/ adopt new water quality objective	Adopt a Water Quality Objective based on biocriteria to address biological community integrity	Heal the Bay et al.
	Water Quality Objectives	Develop/ adopt new water quality objective	Include a water quality objective for emerging contaminants in the Basin Plan	Heal the Bay et al.
	Water Quality Objectives	Develop/ adopt new water quality objective		Heal the Bay et al.
		Develop/ adopt new water quality objective	Include a water quality objective for phosphorus in the Basin Plan	Heal the Bay et al.

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Water Quality Objectives	Re-evaluate mineral objectives	Evaluate ambient data to establish how mineral quality objectives should vary with ambient or natural conditions (e.g., use historic data to establish how background water quality changes in response to wet or dry weather).	Executive Advisory Committee
	Water Quality Objectives	Re-evaluate mineral objectives	Re-evaluate Ventura County's groundwater and surface water objectives (Basin Plan Tables 3-8 and 3-10) using available data generated since 1994.	Ventura County Watershed Protection Division
	Water Quality Objectives	Revise application of objectives	Use dissolved metal concentrations to develop permit limits, establish TMDL LAs and WLAs, and establish compliance — as dissolved metals are the bioavailable form of metals and pose the greatest risk to aquatic life. Recommend use of hardness- based equations for dissolved numeric targets and WLAs.	City of Calabasas/ Executive Advisory Committee
State Board	Water Quality Objectives	Revise application of objectives	Prioritize integrated use of chemical and biological measures to determine if the biota and public health are protected or degraded, as a result of exposure to toxic pollutants in sediments	San Gabriel River Management/SGRMAC & City of Pomona
	Water Quality Objectives	Revise objectives	Consider revisions and updates to Basin Plan tables listing federal and state maximum contamination levels using the most current available data and information.	Ventura County Watershed Protection Division

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Water Quality Objectives	Revise objectives	Revise mineral objectives using appropriate background data and averaging periods, and that explicitly consider the beneficial uses to be protected	EAC et al./ La Verne/Monterey Park
	Water Quality Objectives	Revise objectives	Revise the Water Quality Objective for Nitrogen, Nitrate, Nitrite to provide appropriate protection of aquatic life	Heal the Bay et al.
	Water Quality Objectives	Revise objectives	Modify the pH objective for all inland surface waters to remove the restriction limiting the Allowable pH Change in Receiving Waters to 0.5 pH Units.	County Sanitation Districts
	Water Quality Objectives	Revise objectives	Add reference to the SQO adopted by the State Board in the WQO Chapter of the Basin Plan; clarify that the SQO approach is to be used and that use of Sediment Quality Guidelines (SQGs, including ERLs, ERMs, TELs, etc.) is to be discontinued. Establish that the SQO policy is to be used to evaluate sediment concentrations of pollutants, and that such evaluation is not required as part of WERs/SSOs for upstream freshwater reaches [i.e., do not adopt proposed WER policy, which conflicts with SQO policy].	
State Board	Water Quality Objectives	Revise objectives	Objectives should establish a "floor" as well as a "ceiling" on allowable sediment loads/concentrations	City of Calabasas/Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
State Board	Water Quality Objectives	Revise objectives	Develop sediment quality objectives, and address other sediment management issues such as sediment quantity and transport and conflicts between sediment management and the beneficial uses specified in the basin plan.	La Verne/Monterey Park
State Board	Water Quality Objectives	Revise objectives	Adopt the sediment quality objectives (SQO) being developed by the State Water Resources Control Board.	Los Angeles County DPW
State Board	Water Quality Objectives	Revise objectives	Prioritize and strengthen the Water Quality Objective for Toxicity to adequately protect Aquatic life	Heal the Bay et al.

Heal the Bay et al. includes: Heal the Bay, Santa Monica BayKeeper, Natural Resources Defense Council

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Implementation	Develop/include implementation provisions	Consider including implementation provisions for indicator bacteria to allow for prioritization of human sources in determining compliance with objectives	City of Ventura/ Ventura County Stormwater Program
	Implementation	Develop/include implementation provisions	Develop implementation provisions that allow TMDL actions to focus on human sources of bacteria and mitigation actions to control anthropogenic sources of bacteria deemed sufficient to meet compliance with the bacteria objectives.	City of Los Angeles
	Implementation	Develop/include implementation provisions	Develop a program of implementation for bacteria objectives consistent with CWC section 13242.	La Verne/Monterey Park
	Implementation	Develop/include implementation provisions	Amend the Implementation Chapter of the Basin Plan to specify required implementation actions, focusing primarily on the reduction of bacteria of known human origin	City of Agoura Hills/ City of Westlake

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Implementation	Develop/include implementation provisions	Amend the Implementation Chapter of the Basin Plan to specify required implementation actions, focusing primarily on the reduction of bacteria of known human origin. Use source tracking analyses, where possible and appropriate (e.g., CREST approach, consider alternatives, such as presence of caffeine, synthetic estrogens, etc.). Work to eliminate human sources of bacteria (e.g., eliminate sewer cross- connections, identify and eliminate leaking sewer lines, provide sanitation facilities where needed).	City of Calabasas/ Executive Advisory Committee
	Implementation	Develop/include implementation provisions	Develop implementation provisions that specify that exceedances of the SSMs and geometric mean objectives should not be double counted when they occur on the same day.	City of Los Angeles
	Implementation	Develop/include implementation provisions	Develop a process for measuring and accounting for anthropogenic sources that can be tailored to local conditions.	City of Los Angeles

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Implementation	Re-evaluate implementation provisions	Re-evaluate the implementation procedures for the reference system/antidegradation approach. Suggested revisions include: 1. Identify appropriate "Reference Beaches" to better match impaired beaches' hydrologic and environmental settings 2. Utilize appropriate evaluation methods for consideration of seasonally specific allowable exceedance days for bacteria TMDLs 3. Consider local rainfall conditions, rather than rainfall at LAX, in calculating allowable exceedance days.	City of Ventura
	Natural/Background	Address natural loads/ background	Address AB411 exceedances related	City of Oxnard
	Conditions Natural/Background Conditions	conditions Address natural loads/ background conditions	to natural phenomena. Consider natural background loads and concentrations of bacteria when establishing beneficial uses and water quality standards	Construction Industry Coalition on Water Quality (CICWQ)
	Natural/Background Conditions	Address natural loads/ background conditions	Reconsider SMBB Bacteria TMDL to establish allowable exceedances during summer dry weather that are appropriate to natural conditions and which consider the frequency of monitoring at a particular site	Jurisdictional Groups 5&6
	Natural/Background Conditions	Recognize limitations of current indicator bacteria approach	Recognize that indicator bacteria may be present due to wildlife or regrowth in the environment; bacteria from different sources pose different levels of risk.	City of Calabasas/ Executive Advisory Committee
	Water Quality Objectives - Bacteria	Develop/include implementation provisions	Develop allowable number of exceedance days for inland waters based on inland and local conditions	City of Ventura/ Ventura County Stormwater Program

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Review and update all water quality objectives. A review should include indicator bacteria	City of South Gate
	- Bacteria	Review and revise bacteria objectives	Initiate a review of bacterial indicators, their water quality objectives, and standards for compliance	City of Agoura Hills/ City of Westlake
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Revise the bacteria objectives in the Basin Plan as appropriate based on the findings of a Bacteria Study Task Force and the US EPA bacteria study.	City of Bellflower
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Conduct an extensive review of the current science on bacteria issues, studies conducted in southern California and the pending US EPA study and revise the bacteria objectives in the Basin Plan on the basis of this review.	Jurisdictional Groups 5&6
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Consider whether bacteria water quality objectives should be revised to account for non-human ambient loads, to reflect wet and dry period variability, and to optimize health and ecological risk attenuation using both risk based and cost benefit approaches.	Ventura County Watershed Protection Division/EAC et al./ La Verne/Monterey Park
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Revise bacteria water quality objectives to account for non-anthropogenic sources and background loads. Review bacterial indicators as an effective surrogate for human health risk. Evaluate use of these surrogate indicators as they apply to where exceedance levels are set, including a no exceedance standard for dry weather, geo mean, and natural source exclusion criteria.	City of Alhambra

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Develop a separate geometric mean objective for water bodies with only limited water contact recreational use. Additionally, broaden the calculation of geometric means to include fewer than 5 samples or to expand the averaging period (e.g. seasonal or annual periods).	City of Los Angeles
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Assign single sample maximums appropriate for the level of use of individual water bodies based on the qualitative descriptions and confidence levels described in EPA's criteria document.	City of Los Angeles/City of Ventura/Ventura County Stormwater Program
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Alternatively (to basing SSM on level of use), develop site-specific SSMs using the equation found in EPA's criteria document based on a higher confidence level. Develop a method for removing uncharacterized spikes in bacterial data, so that water quality can be measured more accurately.	City of Los Angeles
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Remove both the fecal and total coliform objectives for marine waters and remove the fecal coliform objective for fresh waters from the Basin Plan based on the 1986 EPA criteria document.	City of Los Angeles/City of Ventura/Ventura Countywide Stormwater Program
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Revise the bacteria standards to acknowledge Enterococcus as a substitute for E. coli in freshwater.	Heal the Bay et al.
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives	Eliminate the geometric mean as a compliance measure for bacteria TMDLs	Jurisdictional Groups 5&6

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
		Review and revise bacteria objectives	Develop a separate geometric mean objective for water bodies with only limited water contact recreational use. This objective would apply in water bodies where some REC1 use takes place, but only where it is small- scale. or infrequent, and of a low intensity.	Ventura County Public Works Agency
	Water Quality Objectives - Bacteria	Review and revise bacteria objectives		Ventura County Public Works Agency

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
		Review and revise bacteria objectives	Revise the bacteria objectives in the Basin Plan as appropriate, based on an extensive review of the current state of science on bacteria issues	Los Angeles County DPW
	Water Quality Objectives - Bacteria		analyses and studies that have	San Gabriel River Management/SGRMAC & City of Pomona

Heal the Bay et al. includes: Heal the Bay, Santa Monica BayKeeper, Natural Resources Defense Council

Jurisdictional Groups 5&6 includes: City of Manhattan Beach, City of El Segundo, City of Hermosa Beach, City of Redondo Beach, City of Torrance, County of Los Angeles and California Department of Transportation (Caltrans).

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Recognize that low and variable flows are typical for the Region, and take these conditions into account when determining beneficial uses and water quality objectives.	The Boeing Company
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Define beneficial uses and water quality objectives in light of the natural variability of storm frequency, duration, and magnitude, and expressly account for natural or ambient conditions, including seasonality, flow, and natural loads.	Construction Industry Coalition on Water Quality (CICWQ)
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Explicitly recognize and take into account the physical characteristics and natural variability of southern California watersheds, including climate, meteorology, geology and soils, and river and stream hydrologic patterns to establish more flexible water quality objectives and beneficial use designations.	Construction Industry Coalition on Water Quality (CICWQ)
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Consider defining water quality objectives in terms of frequency, duration, and magnitude, and (to) account for natural conditions, including seasonality and flow.	City of Alhambra

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Consider whether water quality objectives should be defined in terms of frequency, duration and magnitude, and should expressly account for natural and ambient conditions including seasonality and flow. Short term or acute water quality standards may be more appropriate for storm flow conditions, especially larger storms that would add exponentially to the cost of controlling pollutants	Ventura County Watershed Protection Division/EAC et al
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Recognize the high degree of variability in sediment concentrations and loads, particularly during storm conditions	City of Calabasas/Executive Advisory Committee
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Refine beneficial uses to differentiate between different types of water bodies (ex: concrete lined v. soft bottom) and conform to different types of storm conditions	Construction Industry Coalition on Water Quality
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Consider whether beneficial use designations should reflect wet and dry period variability, particularly during storm flow conditions.	EAC et al/ City of La Verne/City of Monterey Park/Ventura County Watershed Protection Division
	WQS - Stormwater	Account for variability in natural/flow conditions in re-evaluating beneficial uses/WQOs	Develop new beneficial use designations to reflect wet and dry period variability, including storm flow conditions.	City of Alhambra
	WQS - Stormwater	Application of water quality objectives to stormwater	Include clear guidelines for when water quality objectives and beneficial use designations are to apply to infrequent or substantial storm flows and implementation requirements.	City of Alhambra

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	WQS - Stormwater	to stormwater	Adopt "design storm" standards (both rainfall amount and intensity) for use in establishing water quality standards for wet weather events (in permits) and when considering appropriate high-flow exemptions during wet weather storm conditions.	Construction Industry Coalition on Water Quality
	WQS - Stormwater	Application of water quality objectives to stormwater	Consider the development of wet weather standards	Ventura County Stormwater Program
	WQS - Stormwater	Application of water quality objectives to stormwater		EAC et al./La Verne/Monterey Park
	WQS - Stormwater	Review applicability of WQOs to stormwater	Consider the use attainment potential or ability to comply with water quality objectives during storm flows.	Ventura County Watershed Protection Division
	WQS - Stormwater	Review applicability of WQOs to stormwater	Review the applicability of water quality standards to stormwater starting with water quality objectives (hereinafter "WQOs") and then with beneficial use designations	City of Claremont/ City of Inglewood/City of San Dimas/City of Carson/City of Commerce/City of Duarte/City of Gardena/City of Glendora/City of South El Monte/City of Whittier/ City of Irwindale
	WQS - Stormwater	Review applicability of WQOs to stormwater	Review and revise all standards in the basin plan that apply or are to be applied to stormwater	Rutan & Tucker

EAC et al. includes: The Executive Advisory Committee, City of Signal Hill, Coalition for Practical Regulation, Construction Industry Coalition on Water Quality, County Sanitation Districts, Gateway Chambers Alliance, Los Angeles Area Chamber of Commerce, Los Angeles/Orange

Will Issue be addressed by another program?	General Issue	Specific Issue	Commenter
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Counties Building & Construction Trades Council, Tri-Counties Building Trades

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Natural/Background Conditions	Account for natural conditions in establishing beneficial uses/WQOs	Consider natural background loads and concentrations of sediment and metals, when establishing beneficial uses and water quality standards	Construction Industry Coalition on Water Quality (CICWQ)
	Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs	Develop guidelines for consideration of natural sources in establishing water quality objectives, based on scientific study findings.	City of Bellflower/Los Angeles County DWP
	Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs	Revise the narrative Basin Plan sediment standards to reflect ambient and natural sediment loads, and the beneficial role that transported sediment has in beach nourishment and erosion control.	Ventura County Watershed Protection Division/ La Verne/Monterey Park
	Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs	Adopt Site-Specific Objectives for TDS, sulfate, phosphate, and Specific Conductivity to address the naturally-high mineral content of both surface and groundwater in the Malibu Creek watershed	Las Virgenes Municipal Water District (LMWD)
	Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs	Review, consider, and incorporate water quality objectives that reflect natural and ambient conditions of (each) watershed and which are consistent with Water Code Section 13241, <i>et. seq.</i> to determine the extent to which regulation of human activities can actually, measurably, and usefully foster water quality protection	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes/City of Carson/ Hawaiian Gardens/Hidden Hills/La Verne

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs	Review and revise Surface Water Quality Objectives (WQO) to be consistent with the concentrations present in naturally occurring groundwater.	City of Thousand Oaks
	Natural/Background Conditions Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs Account for natural conditions in re- evaluating WQOs	Recognize natural conditions in sediment targets and objectives Consider exclusion of WQOs during storm events resulting from natural background loadings that cause the	City of Calabasas/Executive Advisory Committee City of Agoura Hills/ City of Westlake/ City of Calabasas/Executive Advisory Committee
	Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs	pollutant exceedance. Consider background levels of metals, dioxins, and other regulated constituents from sources such as erosion of native soils in evaluating the Basin Plan's water quality standards, particularly for Bell Creek, Dayton Canyon Creek, Arroyo Simi, Calleguas Creek, and the Los Angeles River.	The Boeing Company
	Natural/Background Conditions	Account for natural conditions in re- evaluating WQOs	Revise Table 3-8 WQO for selected surface waters. Increase WQOs to 2300 (TDS) and 1110 (sulfate)	Las Virgenes Municipal Water District (LMWD)
	Natural/Background Conditions	Broaden application of "natural sources exclusion"	Broaden application of "natural sources exclusion" used in bacterial TMDLs to other naturally occurring constituents based on SCCWRP natural loadings study	City of Ventura/Ventura Countywide Stormwater Program

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Natural/Background Conditions	Broaden application of "natural sources exclusion"	Broaden application of natural sources exclusion approach to other naturally occurring constituents such as arsenic, selenium and salts and extend the use of the concept to NPDES permits and the application to all applicable objectives (acute, chronic and geometric mean).	City of Los Angeles
	Natural/Background Conditions	Revise beneficial uses to account for natural/background conditions	Conduct a Use Attainability Analysis to determine if uses can be attained or are not significantly impaired by naturally occurring algal conditions	Las Virgenes Municipal Water District (LMWD)
	Natural/Background Conditions	Revise beneficial uses to account for natural/background conditions	Revise Table 2-1 (Beneficial Uses) to reflect natural non-attainment of beneficial uses affected by or potentially affected by exceedances of the phosphorus objective. Delist or otherwise reclassify those uses that depend on meeting the current WQOs for minerals (e.g. specific conductivity, TDS, sulfate) and biostimulatory substances in the Malibu Creek Watershed.	Las Virgenes Municipal Water District (LMWD)
	Natural/Background Conditions	Revise beneficial uses to account for natural/background conditions	Include footnote in Table 2-1 indicating that beneficial uses are not impaired by observed phosphorus levels (in the Malibu Creek Watershed). Explicitly recognize the impact of geology on biostimulation due to high conductivity and high phosphorus levels in certain geologic formations	Las Virgenes Municipal Water District (LMWD)

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	5	natural/background conditions	· · · · · · · · · · · · · · · · · · ·	Las Virgenes Municipal Water District (LMWD)

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Site Specific Objectives	Develop site-specific objectives	Establish site-specific objectives (SSO) for various water bodies for all pollutants of concern using appropriate method by conducting necessary scientific studies. Incorporate the SSOs into the Basin Plan through a Basin Plan Amendment	City of Bellflower
TMDL	Site Specific Objectives	Develop site-specific objectives	Develop site-specific objectives for chloride (e.g., for the Upper Santa Clara River).	Executive Advisory Committee/EAC et al./ La Verne/Monterey Park
	Site Specific Objectives	Develop site-specific objectives	Develop site-specific objectives for cyanide	EAC et al./ La Verne/Monterey Park
	Site Specific Objectives	Develop site-specific objectives	Develop site-specific objectives for California Toxics Rule (CTR) human health criteria.	EAC et al./ La Verne/Monterey Park
	Site Specific Objectives	Develop site-specific objectives	Develop site-specific objectives for copper and other appropriate metals (e.g., via a water effects ratio analysis).	EAC et al./ La Verne/Monterey Park
	Site Specific Objectives	Develop site-specific objectives	Establish site-specific objectives (SSO) for various water bodies for all pollutants of concern (environmentally toxic contaminants) using appropriate method by conducting necessary scientific studies.	Los Angeles County DPW
TMDL; Watershed Regulatory	Site Specific Objectives	Incorporate site-specific objectives	Incorporate WERs into TMDLs and permits. The LA River metals and nitrogen TMDLs should be reopened to revise allocations based on site- specific WERs for copper and ammonia. Relevant permits should also be reopened to incorporate revised effluent limits based on the WERs.	City of Los Angeles

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Site Specific Objectives	Incorporate site-specific objectives		City of Calabasas/Executive Advisory Committee

EAC et al. includes: The Executive Advisory Committee, City of Signal Hill, Coalition for Practical Regulation, Construction Industry Coalition on Water Quality, County Sanitation Districts, Gateway Chambers Alliance, Los Angeles Area Chamber of Commerce, Los Angeles/Orange Counties Building & Construction Trades Council, Tri-Counties Building Trades

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	CTR applied to Stormwater	Incorporate references to CTR	Incorporate references to the California Toxics Rule (CTR) and the State Implementation Plan (SIP) into the Basin Plan	City of Oxnard
OCC	CTR applied to Stormwater	Provide guidance on CTR application to stormwater	Provide guidance for why and how California Toxics Rule (CTR) standards and data extrapolations should be applied to stormwater flows or other seasonably variable factors.	EAC et al./Ventura County Watershed Protection Division
OCC	CTR applied to Stormwater	Provide guidance on CTR application to stormwater	Develop clear guidelines for why and how California Toxics Rule standards and data extrapolations should be applied to stormwater flows	City of Alhambra
000	CTR applied to Stormwater	Provide guidance on CTR application to stormwater	Clarify how CTR objectives are to be applied to storm water	City of Calabasas/Executive Advisory Committee
OCC	CTR applied to Stormwater	Provide guidance on CTR application to stormwater	More specifically, clarify the applicability and implementation through permits of CTR criteria to stormwater discharges	City of Oxnard
OCC	CTR applied to Stormwater	Review and update CTR criteria	Review and update all water quality objectives. A review should include the California Toxics Rule (CTR)	City of South Gate

EAC et al. includes: The Executive Advisory Committee, City of Signal Hill, Coalition for Practical Regulation, Construction Industry Coalition on Water Quality, County Sanitation Districts, Gateway Chambers Alliance, Los Angeles Area Chamber of Commerce, Los Angeles/Orange Counties Building & Construction Trades Council, Tri-Counties Building Trades

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
SCCWRP & UCLA studies on atmospheric dep			Consider background levels of metals, dioxins, and other regulated constituents from sources such as atmospheric deposition in evaluating the Basin Plan's water quality standards, particularly for Bell Creek, Dayton Canyon Creek, Arroyo Simi, Calleguas Creek, and the Los Angeles River.	The Boeing Company
SCCWRP & UCLA studies on atmospheric dep			Amend water quality objectives to specify that ambient conditions (e.g. atmospheric deposition) beyond a discharger's control may result in exceedances. Relevant to metals, nutrients, mineral quality objectives, and certain organic pollutants, such as PAHs and dioxin	City of Calabasas/Executive Advisory Committee
SCCWRP & UCLA studies on atmospheric dep		Account for atmospheric deposition in re-evaluating beneficial uses /WQOs	Consider Atmospheric Deposition when Establishing Beneficial Uses and Water Quality Standards	Construction Industry Coalition on Water Quality (CICWQ)
	Atmospheric Deposition - Implementation	atmospheric deposition in basin plan	Modify the Basin Plan to recognize/incorporate a framework for working with federal and state agencies to reduce pollutants in waterbodies caused by atmospheric deposition.	Ventura Countywide Stormwater Program

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Atmospheric Deposition - Implementation	Incorporate actions to address atmospheric deposition in basin plan	Incorporate and recognize source control actions to the extent possible in the Implementation section of the Basin Plan. In the source control discussion in the Basin Plan, clearly acknowledge the need to address atmospheric deposition (direct and indirect) as a major non-point source of water quality impairments. Recognize that direct control of atmospheric deposition is beyond the ability of municipalities and Water Boards. Specify the need for CARB and SCAQMD to consider the secondary effects on water in regulatory programs. Specify that the Regional Water Board to use the authorities of Sections 13146 and 13247 of the California Water Code to require State offices, departments, and boards to take actions to control atmospheric deposition of water pollution, if necessary.	City of Calabasas/Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Implementation		The implementation section of the Basin Plan should be amended to specify the applicability of water quality objectives and enforcement during a State of Emergency (e.g., in response to earthquakes, acts of terrorism, etc.) when resources may be redirected to acute emergency needs and away from water quality control functions	Executive Advisory Committee
	Implementation	Develop guidelines for implementation program development	Guidelines should be developed to create a program of implementation, consistent with the requirements of Porter-Cologne Section 13242, for existing and future Basin Plan water quality standards	EAC et al./ Construction Industry Coalition on Water Quality (CICWQ)
	Implementation	Develop guidelines for implementation program development	Establish clear guidelines to create a program of implementation, consistent with Porter-Cologne Section 13242.	City of Bellflower/Jurisdictional Groups 5&6/La Verne/Monterey Park/Los Angeles County DPW
	Implementation	Develop guidelines for implementation program development	Include a description of actions that are necessary to meet objectives in implementation program.	City of Arcadia
	Implementation		Evaluate a range of alternatives for a given water quality objective (i.e., performing the 13241/13242 analyses for a range of potential alternatives), and/or allowing phased implementation.	Executive Advisory Committee
	Implementation	Funding implemetation		Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Implementation	Include implementation language	Consider implementation language requiring standards review prior to permitting, TMDL development, etc.	Executive Advisory Committee
	Implementation	Pollution trading policy	Consider developing a policy on pollution trading/offsets for inclusion in the Basin Plan using the U.S. EPA guidance document, Water Quality Trading Policy, January 13, 2003	County Sanitation Districts
	Implementation	Pollution trading policy	Develop a water quality trading policy section for the Strategic Planning and Implementation Chapter of the Basin Plan to help bring the Plan up-to-date by providing a framework to implement the concept of water quality trading that U.S.E.P.A. has promoted and supported for over a decade as an "innovative approach for achieving water quality standards with flexibility and cost efficiency." Use as a basis the 2007 Water Quality Toolkit for Permit Writers issued by EPA to support implementation of the water quality trading framework contained in EPA's 2003 National Water Quality Trading Policy for which EPA provided guidance in its 2004 Water Quality Trading Assessment Handbook	

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Implementation	Pollution trading policy	Basin Plan should clarify the Board's positions on trading and/or offsets as a means to achieve compliance with water quality standards, and promote trading/offsets where they may promote efficient pollutant control or TMDL compliance	Executive Advisory Committee
	Implementation	Provide implementation plan	Provide an implementation plan for achieving water quality objectives as required by Section 13242.	City of Paramount/City of San Marino/City of Signal Hill/Rutan & Tucker
	Implementation	Provide implementation plan	The Basin Plan should include an implementation plan.	City of Downey/Pico Rivera
	Implementation	Variance policy	Consider adopting a variance policy or general permit for short-term discharges with no significant impact	Ventura Countywide Stormwater Program

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Jurisdictional Groups 5&6 includes: City of Manhattan Beach, City of El Segundo, City of Hermosa Beach, City of Redondo Beach, City of Torrance, County of Los Angeles and California Department of Transportation (Caltrans).

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	13241	Consideration of Economics	In accordance with 13241, estimate the likely costs to communities of complying with the Basin Plan regulations. This would include providing a conceptual implementation plan, an assessment of potential factors that could affect the cost estimate, including the technological uncertainties and monitoring limitations.	City of Artesia/City of Cerritos/City of Covina/Pico Rivera
	13241	Consideration of Economics	Consider Economic Impacts of Basin Planning and Resulting Impact on Housing and Housing Affordability	Construction Industry Coalition on Water Quality
	13241	Consideration of Economics	The Basin Plan needs to explore the achievability and funding issues confronted by local government, including whether the programs are reasonable achievable, the program costs, likely funding sources, and response to "short falls".	City of Downey/Monterey Park

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	13241	Consideration of Economics	Economic considerations should include the USC report, further analysis of costs of fully achieving metals TMDLs, the recommendations of the Sundig and Zilberman report, the California Coalition for Clean Water White Paper, "Reassessing California's Water Quality Programs" (February 2004), and League of Cities' "Final Report of the Water Quality Regulatory Task Force – Problems and Suggested Actions – July 18, 2003".	City of Downey
	13241	Consideration of Economics	Hold a workshop to evaluate each jurisdiction's responsibility for compliance, cost of compliance to specific municipal programs, and cost impacts to regional economy.	Irwindale
	13241	Consideration of Economics	Fully explore the achievability and funding issues confronted by local government, including whether the programs are reasonable achievable, the costs of the programs, the likely sources of funding and any "short fall" of funding.	City of Signal Hill

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	13241	Consideration of Economics	Collect existing opinion surveys as part of the Triennial Review and Basin Plan Update, in order to determine the public attitudes toward supporting additional taxes or assessments for water quality, including the Charlton Survey of LA County voters in 2002. Factor this information into the implementation plan.	City of Downey
	13241	Consideration of Economics	Consider the water quality goals/objectives as related to the current and future economic impacts	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes Estates/City of Carson
	13241	Consideration of Economics	The revised Basin Plan should reflect the fact that numeric limits cannot "reasonably be achieved" by stormwater dischargers at this time	Rutan & Tucker
	13241	Consideration of Economics	Estimate the likely costs of complying with the Basin Plan's regulations on Sierra Madre. This would include providing a conceptual implementation plan, an assessment of potential factors that could affect the cost estimate, including technological uncertainties and monitoring limitations.	Sierra Madre
	13241	Consideration of Economics - Bacteria	Assess costs of complying with bacteria objectives.	La Verne/Monterey Park
	13241	Consideration of Economics - Bacteria	Analyze the magnitude of the costs necessary to comply with WQOs for bacteria as required under Water Code Section 13242.	City of Thousand Oaks

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	13241	Consideration of Economics - CTR	The Basin Plan needs to include an analysis of the achievability and economics in the strict application of numeric limits derived from the California Toxics Rule (CTR)	City of Signal Hill
	13241	Consideration of Economics - CTR	Include an analysis of the achievability and economics of including numeric limits based on CTR such as Metals TMDLs and Municipal Action Levels in the Ventura MS4 Permit.	City of Downey/La Verne/Monterey Park
	13241	Consideration of Economics - Metals		La Verne/Monterey Park
	13241	Consideration of housing impacts	Take into consideration the impacts of regulations on housing per section 13241.	City of Downey/Hidden Hills/Irwindale
	13241	Consideration of housing impacts	Discuss the impact on housing of the water quality regulations and propose alternatives.	City of Signal Hill
	13241	Review WQOs in light of 13241 requirements	Take Section 13241 factors into consideration when reviewing the water quality standards	The Boeing Company
	13241	Review WQOs in light of 13241 requirements	Establish Basin Plan beneficial uses, water quality objectives, and Waste Discharge Requirements in accordance with applicable law. Include cost-benefit, economic and environmental impacts of objectives and effluent requirements, and reasonableness in balance with societal needs, particularly as they apply to stormwater discharges.	City of Thousand Oaks

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	13241	Review WQOs in light of 13241 requirements	Reconsider blanket application of water quality objectives without consideration of the economic and other conditions specific to jurisdictional agencies	City of Arcadia
	13241	Review WQOs in light of 13241 requirements	Undertake limited review of water quality standards to ensure that objectives are being implemented in a manner that is reasonable and consistent with the CWA and Porter Cologne.	La Verne/Monterey Park
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Consider the requirements of Porter Cologne (California Water Code) Sections 13000 and 13241, to estimate economic, social and housing impacts of water regulations.	City of Bellflower/ Hidden Hills/City of Los Angeles
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Conduct a full 13241/13000 analysis of the Standards that apply or are to be applied to Stormwater	Rutan & Tucker
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Revise the Basin Plan to take into account the requirements of Water Code Sections 13241 and 13000 in connection with storm water, including urban runoff.	City of Downey
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Factor in the most recent socio- economic information into the Basin Plan review, consistent with Water Code sections 13241 and 13000, including local unemployment rates.	City of Downey

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Revise stormwater quality standards in conformance with Water Code Section 13241 and 13000 with recommendations from municipal permittees and other interested parties.	City of Claremont/ City of Inglewood/City of San Dimas/City of Carson/City of Commerce/City of Duarte/City of Gardena/City of Glendora/City of South El Monte/City of Whittier/City of Irwindale
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Develop protocols to ensure that Porter Cologne § 13000 and §13241 factors are adequately considered when developing water quality standards	City of Oxnard/ Irwindale/La Verne/Monterey Park
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Develop explicit protocols to ensure that Basin Plan designated uses and water quality standards are assessed in accordance with CWC 13000 and 13241 factors.	Construction Industry Coalition on Water Quality (CICWQ)
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Ensure that existing and future Basin Plan water quality standards and associated implementation programs have been assessed and adopted in accordance with Porter-Cologne Section 13000, 13241, and 13242 requirements	City of Alhambra
	13241/13000	Review WQOs in light of 13241 and 13000 requirements	Develop explicit protocols to ensure that existing and future Basin Plan water quality standards are consistently and substantively assessed in accordance with Porter- Cologne Section 13000 and Section 13241 factors	EAC et al.

EAC et al. includes: The Executive Advisory Committee, City of Signal Hill, Coalition for Practical Regulation, Construction Industry Coalition on Water Quality, County Sanitation Districts, Gateway Chambers Alliance, Los Angeles Area Chamber of Commerce, Los Angeles/Orange

Will Issue be addressed by another program?	General Issue	Specific Issue	Commenter
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Counties Building & Construction Trades Council, Tri-Counties Building Trades

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
TMDL	303d	TMDL process	Consider all potential up-stream sources of pollution when designating lower reaches of a watershed as impaired	City of Ventura
TMDL	303d	TMDL process	Verify that stormwater discharges are the cause of impairments prior to developing final TMDLs	City of Claremont/ City of Inglewood/City of San Dimas/City of Carson/City of Commerce/City of Duarte/City of Gardena/City of Glendora/City of South El Monte/City of Whittier/City of Irwindale/City of Monterey Park
TMDL	303d	TMDL process	Specify in the Basin Plan how each pollutant for which a TMDL has been assigned impairs a specific use within a specific reach of a water body.	City of Claremont/ City of Inglewood/City of San Dimas/City of
TMDL/Permits	Implementation	Implementation Strategy	Study a phased implementation approach, as recommended by the League of Cities, including an examination of the challenges confronting local government when they are required to implement the NPDES Permit programs, the LA River Trash TMDL, the LA River Metals TMDL and other TMDLs at the same time.	City of Downey

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
TMDL/Permits	Implementation	Implementation Strategy	Provide an implementation strategy that would depend on the installation of "dry weather" diversions of urban runoff to the local sewer system. Document the progress of these installations, including their costs. Include information from the Sanitation Districts on the ability of the Districts to accommodate dry weather sewer diversions from Signal Hill and the other communities served by the District.	City of Signal Hill/Downey
TMDL	Implementation	Implementation Strategy	Make it a high priority to (i) Follow the guidance in Chapter 7 - Development of an Implementation Plan in A Process for Addressing Impaired Waters in California when developing TMDL implementation plans, (ii) Establish clear guidelines to create a program of implementation, consistent with Porter Cologne Section 13242, (iii) Establish clear guidelines for the. preparation and approval of TMDL Implementation Compliance Plans so that responsible agencies' implementation efforts are in accordance with an adopted implementation compliance plan.	Partnership (LASQP)

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
TMDL/Permits	Implementation	Implementation Strategy	Include in the "Strategic Planning" section the use of WQASs to include as many of the entities as possible to facilitate the achievement of TMDL targets. WQASs for TMDLs incorporated into the LA Basin Plan should be based on the SFRWQCB Water Quality Attainment Strategy and TMDL for Diazinon and Pesticide- Related Toxicity in Urban Creeks.	Executive Advisory Committee/City of Calabasas
TMDL/Permits	Implementation - TMDL	Adopt TMDL implementation plans	Present the Dry Weather SMBBB TMDLs Implementation Plan for adoption by the Regional Board with the understanding that this plan will be revised as additional information becomes available and a review of the indicator organisms and bacterial objectives occurs.	Jurisdictional Groups 5&6
TMDL/Permits	Implementation - TMDL	Adopt TMDL implementation plans	Review and adopt the Implementation Plans developed by responsible agencies under the Wet Weather SMBBB TMDLs so that the responsible agencies' implementation efforts are in accordance with an adopted implementation plan for compliance.	
TMDL	Implementation - TMDL	Adopt TMDL implementation plans	Adopt implementation plans concurrently with other TMDL components	San Gabriel River Management/SGRMAC & City of Pomona/City of Calabasas
TMDL	Implementation - TMDL	Implementation Strategy	Provide discussion of how the Board should consider realistic timelines for organizing, funding and completing the special studies resulting from the various Metals TMDLs.	City of Downey/City of Signal Hill

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
TMDL	Implementation - TMDL	Implementation Strategy	Establish clear guidelines for the preparation and approval of TMDL Implementation Compliance Plans so that responsible agencies' implementation efforts are in accordance with an adopted implementation compliance plan.	City of Bellflower/Jurisdictional Groups 5&6/Los Angeles County DPW
TMDL/Permits	Implementation - TMDL	Implementation Strategy	Develop a policy in the Basin Plan that would assign the proper waste load allocations to the private sector permittees, instead of the current policy of holding local government accountable for all pollutants, regardless of the source	City of Signal Hill
TMDL	Implementation - TMDL	Implementation Strategy	The Basin Plan should contain a TMDL implementation discussion, which would provide consistency with the lessons learned in the Los Angeles River Trash TMDL.	City of Downey
TMDL/Permits	Implementation - TMDL	Incorporating TMDLs in stormwater permits	Establish policy for incorporating TMDLs into municipal stormwater permits through iterative BMP implementation and technology based action levels.	City of Bellflower/Los Angeles County DPW
TMDL/Permits	Implementation - TMDL	Incorporating TMDLs in stormwater permits	Develop guidance on incorporation of TMDL requirements into permits	Ventura Countywide Stormwater Program
TMDL/Permits	TMDLs	Implementation Strategy	Establish mass-based TMDLs to allow trading or offsets	Executive Advisory Committee
TMDL	TMDLs	Revise TMDLs	Revise the LA River nitrogen TMDL to remove weekly monitoring requirement and replace it with a one- year monitoring period to determine whether a reduced monitoring frequency (i.e. monthly) could be supported.	City of Los Angeles

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
TMDL	TMDLs		Revise 303d list and Ballona Creek Estuary TMDL, Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters TMDL, and Marina del Rey Toxics TMDL to make them consistent with the California Sediment Quality Objectives (SQO) Policy. Remove NOAA SQGs from TMDL regulatory targets.	City of Los Angeles
TMDL	TMDLs	Revise TMDLs	Reopen and revise TMDLs for sediment quality that rely upon SQGs to make them consistent with the SQO policy (e.g., Ballona Creek Estuary TMDL)	Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
TMDL	TMDLs	Revise TMDLs	Revise metals TMDLs such that compliance is determined based on receiving water concentrations as compared to dissolved metals criteria. If dissolved metals criteria are met in the receiving water, TMDLs should be reconsidered to revise allocations.	City of Los Angeles
TMDL	TMDLs	Revise TMDLs	Use the narrative SQOs and the implementation program specified in SQO- part 1 instead of NOAA's guidelines at the re-opener of the existing Toxics TMDLs and the development of future TMDLs	City of Agoura Hills/ City of Westlake/City of Calabasas
TMDL	TMDLs	TMDL process	The Basin Plan should include a provision to allow adopted TMDLs to be modified and updated with the most recent findings established while developing newer TMDLs for similar impairments in other watersheds.	Jurisdictional Groups 5&6

Jurisdictional Groups 5&6 includes: City of Manhattan Beach, City of El Segundo, City of Hermosa Beach, City of Redondo Beach, City of Torrance, County of Los Angeles and California Department of Transportation (Caltrans).

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Tributary Rule	Clarify application of Tributary Rule	Clarify the application of the Tributary Rule, especially as it relates to agricultural drainages and stormwater conveyance systems.	City of Oxnard
	Tributary Rule	Clarify application of Tributary Rule	Clearly delineate the applicable beneficial uses and water quality objectives under the tributary rule and exclude treatment BMPs such as treatment ponds	Ventura County Stormwater Program
	Tributary Rule	Clarify application of Tributary Rule	Clarify that downstream uses must continue to be protected, but that direct translation of beneficial uses is not required (and note that direct translation of beneficial uses may preclude some treatment strategies, such as use of regional treatment before water travels downstream to a waterbody with an existing use)	City of Calabasas/Executive Advisory Committee
	Tributary Rule	Clarify application of Tributary Rule	Apply the Tributary Rule only where there is an actual and recorded hydrologic connection - not just in response to storm events or where commingling of water and aquatic life is possible.	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes Estates/City of Carson/Hawaiian Gardens/Hidden Hills/La Verne/Monterey Park
	Tributary Rule	Revise the Tributary Rule	Revise the Tributary Rule to reasonably protect designated beneficial uses without extending, at enormous potential expense, regulatory requirements to each and every upstream drainage basin within the Los Angeles Region.	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes Estates/City of Carson/Hawaiian Gardens/Hidden Hills/La Verne/Monterey Park

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Tributary Rule	Revise the Tributary Rule	Revise the Basin Plan tributary rule to account for infrequent storm flows, hydrologic connectivity, co-mingling of non-storm flows, and exchange of aquatic life required to apply downstream beneficial uses to upstream locations.	City of Alhambra/City of Calabasas/Executive Advisory Committee/ EAC et al.
	Tributary Rule	Revise the Tributary Rule	Revise the Basin Plan tributary rule to account for limited duration stormwater flows.	Executive Advisory Committee/ EAC et al.
	Tributary Rule	Revise the Tributary Rule	Revisit and evaluate the appropriateness of including the tributary rule in the Basin Plan and/or revise the tributary rule to minimize unintended outcomes from the misapplication of the rule	Executive Advisory Committee

EAC et al. includes: The Executive Advisory Committee, City of Signal Hill, Coalition for Practical Regulation, Construction Industry Coalition on Water Quality, County Sanitation Districts, Gateway Chambers Alliance, Los Angeles Area Chamber of Commerce, Los Angeles/Orange Counties Building & Construction Trades Council, Tri-Counties Building Trades

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Revisions	Include source control overview	Add a new source control overview to Chapter 1 to explain the need for true source control.	City of Calabasas/Executive Advisory Committee
	Revisions	Incorporation by reference	Incorporate references to the California Toxics Rule (CTR) and the State Implementation Plan (SIP) into the Basin Plan	City of Oxnard
	Revisions	Incorporation by reference	Revise the "Function of the Basin Plan" section to state specifically which applicable State and Regional Board plans and policies, and other pertinent water quality plans and policies, are incorporated by reference. Structure the plan as an electronic file to permit easy amendment.	Executive Advisory Committee
	Revisions	Revise the "Climate" section	Expand the "Climate" section to include a "comprehensive description of rainfall and runoff patterns in the Region". Include text, graphs, and maps to thoroughly explain the highly variable and episodic nature of rainfall in the coastal watersheds of the region. Include graphical display of rainfall distribution by storm size for rain gauges across the region and isohyetal maps for the coastal watersheds of Los Angeles and Ventura counties.	City of Calabasas/Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Revisions	Revise the "Function of the Basin Plan" section	Revise the "Function of the Basin Plan" section to explain how TMDLs are incorporated into the Basin Plan. Specify that each TMDL will be accompanied by a Water Quality Attainment Strategy (WQAS). Specify actions that should be taken by State offices, departments, and boards to achieve the numeric targets in the TMDL. Recommend actions that should be taken by federal agencies and others. Establish that TMDLs and WQASs should be combined.	Executive Advisory Committee/City of Calabasas
	Revisions	Revise the "legal basis and authority" section.	Introduce the use of Water Code Section 13247 early in the Basin Plan. Revise the "Legal Basis and Authority" section to explain the authority given to the Regional Board by Section 13247 of the State Water Code to require State offices, departments, and Boards, in carrying out activities that may affect water quality, to comply with the Water Quality Control Plan once approved by the State Board unless otherwise directed or authorized by statute.	City of Calabasas/Executive Advisory Committee
	Revisions	Revise the "legal basis and authority" section.	Cite the provisions in the Clean Air Act that can be used for controlling atmospheric pollutants that cause impairments to water quality.	City of Calabasas/Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Revisions	Revise the "legal basis and authority" section.	Specify actions that may be taken by other agencies to address water quality issues. Agencies may include: CARB, CIWMB, SCAQMD, DPR, DTSC and OEHHA.	Executive Advisory Committee
	Updates and Mapping	Define boundaries	Delineate and define estuaries in the Los Angeles Region	City of Ventura
	Updates and Mapping	Define boundaries	Delineate the extent of the Ormond Wetlands. The data show the. extent of tidal influence, and the impact of breaching of the berm at the wetland/ocean interface	City of Oxnard
	Updates and Mapping	Provide an updated and complete version of the Basin Plan.	Suggest that an integrated, fully complete Basin Plan be developed (i.e., update and reissue the 1994 Basin Plan once analyses are complete, so that all information is clear and in one place).	Executive Advisory Committee
	Updates and Mapping	Provide an updated and complete version of the Basin Plan.	Provide updated and complete Basin Plan as an on-line document. Notify public of updates each time a change is made, and display a log of each Basin Plan change with a list of pages that need to be reprinted to maintain a fully up-to-date version.	Executive Advisory Committee
	Updates and Mapping	Update tables and maps in the Basin Plan	Update the Basin Plan to include reaches in the beneficial use tables which currently identify water segments by their hydrologic unit	City of Claremont/ City of Inglewood/City of San Dimas/City of Carson/City of Commerce/City of Duarte/City of Gardena/City of Glendora/City of South El Monte/City of Whittier/City of Irwindale/City of Monterey Park

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Updates and Mapping	Update tables and maps in the Basin Plan	 Display the watershed management areas; Align the existing Hydrologic Units (HU) with the most recent Cal Water 2.2 system (although this is on our list of suggestions, we understand that the Regional Board currently plans to update the Basin Plan to align the HUs with the most recent Cal Water 2.2 database); Update the reaches as appropriate. The current Basin Plan reach definitions are not consistent with the 303(d) listed reaches, which results in confusion in the application of objectives and listings within the affected watersheds. Define and delineate estuaries and enclosed bays; Review for consistency between the reach maps and beneficial use tables - provide the reach number and hydrologic unit in the beneficial use tables; Update the waterbody-specific surface water and groundwater objectives tables to be consistent with the updated reaches; Update the groundwater maps based on the Department of Water Resources (DWR) Bulletin 118 (2003 update); and - 	Stormwater Program

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Updates and Mapping	Update tables and maps in the Basin Plan	Update maps and beneficial use tables for clarity and consistency, including updating reaches to match those in the 303d list process; provide reach number and hydrologic unit in beneficial use tables; update water body specific objective tables to be consistent with reaches in beneficial use tables; create GIS layers of reaches; display watershed management areas; align hydrologic units with CalWater 2.2 system; define and delineate estuaries and enclosed bays; update groundwater maps based on DWR Bulletin 118 (2003 update).	City of Los Angeles
	Updates and Mapping	Update beneficial use tables	Once the maps and reaches are updated, evaluate the application of beneficial uses and waterbody- specific water quality objectives. Make the beneficial uses specific to the area in which the use applies.	City of Ventura/ Ventura Countywide Stormwater Program
	Updates and Mapping	Update hydrologic units	Bring the hydrological units (HU) and actual watershed areas as delineated in the Basin Plan into alignment	

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Hydromodification	Hydromodification/LID policy	Develop a regional policy on hydromodification of watercourses in the LA Region. It is recommended that the LA Water Board coordinate with the Southern California Storm Water Monitoring Coalition (SMC) and consider modifying the Basin Plan to incorporate the results of the SMC regional methodology (once completed) to eliminate or mitigate the adverse impacts of hydromodification as a result of urbanization, including hydromodification assessment and management tools.	Ventura Countywide Stormwater Program
	Hydromodification	Hydromodification/LID policy	Establish stakeholder process to establish regional hydromodification and low impact development (LID) policies and revise implementation section of Basin Plan accordingly. Coordinate with efforts by others (CASQA). Establish permit limits only after stakeholder process and research	Executive Advisory Committee
	Hydromodification	Hydromodification/LID policy		City of Downey
	Hydromodification	Hydromodification/LID policy	Devote substantial discussion to the newly emerging policy of low impact development in a chapter on stormwater.	City of Signal Hill

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Stormwater	Application of numeric limits	Clarification on the approach to using numeric limits, including (if limits are to be used) development of a methodology for establishing numeric limits for storm water flows	City of Calabasas/Executive Advisory Committee
	Stormwater	Compliance assessment	Update the Basin Plan to incorporate program effectiveness assessment principles identified by CASQA	Ventura Countywide Stormwater Program
	Stormwater	Compliance assessment	Base compliance assessment for stormwater quality on BMP implementation and not numerical limits.	City of South Gate
	Stormwater	Compliance assessment	Fully explain the implications of the current TMDL policy, and the incorporation of TMDL waste load allocations as municipal permit limits, on local government and explore alternative implementation tools for the Basin Plan, like MOUs, in a dedicated chapter on stormwater in the Basin Plan.	City of Downey
Stormwater Permitting; Irrigated Agricultural Lands Waiver Program	Stormwater	Regulation of All Sources	Increase the level of regulatory oversight and responsibility of point sources such as industrial, agricultural, business, and construction sources to match that of other permits such as the MS4s	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes Estates City of Carson/Downey (regarding TMDL wasteload allocations in particular)/Hawaiian Gardens
Stormwater Permitting	Stormwater	Regulation of All Sources	Regulate Phase II facilities to ensure responsibility of the quality of discharge from their sites	City of Bell/ City of Lawndale/ City of Norwalk/City of Palos Verdes Estates/City of Carson/Hawaiian Gardens

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Stormwater	Separate Stormwater Chapter	Consolidate the discussions of stormwater and urban run-off, which are currently divided between the discussions of point source and non- point source pollution.	City of Agoura Hills/City of Westlake/City of Calabasas/Executive Advisory Committee
	Stormwater	Separate Stormwater Chapter	Develop a separate chapter in the Basin Plan to compile existing information on stormwater and stormwater regulation in the Region	City of Oxnard
	Stormwater	Separate Stormwater Chapter	Develop a discrete Storm Water Policy chapter within the Basin Plan to better define the characteristics of southern California hydrologic units and climatic variability	Construction Industry Coalition on Water Quality (CICWQ)
	Stormwater	Separate Stormwater Chapter	Reformat the Basin Plan to have a stand-alone chapter for stormwater. This chapter would contain clear policy, and define the applicability of standards and beneficial uses.	City of Alhambra
	Stormwater	Separate Stormwater Chapter	Develop a Storm Water Chapter in the Basin Plan. The major policies that should be discussed in the Storm Water Chapter include: Receiving Waters Limitations Language, Enforcement Issues, and Alternatives for TMDL Implementation — Memorandum of Understandings (MOUs)	

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Design Storm	Implementation	Establish BMP performance criteria (<i>based on design storm</i>) and identify BMPs that achieve the performance criteria.	City of Bellflower
	Design Storm	Implementation	Incorporate a water quality and/or storm sizing criteria or requirement into the Basin Plan either through the adoption of individual TMDLs as has been the case with trash TMDLs, or through a standard that would be applicable to most TMDLs within the Los Angeles Basin.	Jurisdictional Grups 5&6
	Design Storm	Implementation	Develop and Incorporate a water quality and/or storm sizing criteria or requirement and the (re)development circumstances under which the criteria are to apply.	City of Agoura Hills/ City of Westlake/San Gabriel River Watershed Management Area Committee (SGRWMAC)/City of Calabasas
	Design Storm	Implementation	Develop a water quality and/or storm sizing "cutoff' for the design and construction of Best Management Practices (BMPs) and the (re)development circumstances under which the criteria are to apply.	San Gabriel River Management/SGRMAC & City of Pomona
	Design Storm	Implementation	Establish stormwater treatment BMP performance goals that should be incorporated into the Basin Plan	Ventura Countywide Stormwater Program
	Design Storm	Stormwater Policy	Develop Basin Plan provisions defining peak storm flows and related criteria for design storm structural BMPs, which includes an analysis of the economic and societal factors.	City of Alhambra

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Design Storm	Stormwater Policy	Develop appropriate design storm criteria and amend the Basin Plan to incorporate guidelines on water quality design storm.	Los Angeles County DPW/City of Bellflower
	Design Storm	Stormwater Policy	Develop a comprehensive approach to storm water management to include provisions for a design storm (to be specified using both rainfall amount and rainfall intensity) for design of control measures and for enforcement considerations	City of Calabasas/Executive Advisory Committee
	Design Storm	Stormwater Policy	Make it a priority to complete work on the design storm criteria given: 1) a critical need to achieve water quality standards has been identified; 2) significant effort has already been expended; 3) the opportunity is at hand to leverage the work to-date to other watersheds, land uses, and pollutants; and 4) the imperative, nature of having water quality design storm criteria that stormwater quality engineers can use to design best management practices	Los Angeles Stormwater Quality Partnership (LASQP)
	Design Storm	Stormwater Policy	The trash TMDL design storm should be evaluated for use in regulation of other pollutants in storm flows	City of Calabasas/ Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Design Storm		Identify a reasonable Design Storm for compliance with applicable TMDLs during wet weather. Continue the process of setting a design storm that considers the factors outlined in Sections 13241 and 13242 of the California Water Code.	County Sanitation Districts

Jurisdictional Groups 5&6 includes: City of Manhattan Beach, City of El Segundo, City of Hermosa Beach, City of Redondo Beach, City of Torrance, County of Los Angeles and California Department of Transportation (Caltrans).

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
Watershed Regulatory	NPDES Permits	Numeric Limits for Toxicity	Examine/re-examine the relationship between stringent numeric limits and water quality standards, for toxicity, as well as the reasonableness of stringent numeric limits themselves	The Boeing Company
Watershed Regulatory	NPDES Permits	Dilution Factors and Assimilative Capacity	Develop guidelines to address how the Regional Board will determine dilution factors and assimilative capacity.	EAC et al./ La Verne/ Monterey Park

EAC et al. includes: The Executive Advisory Committee, City of Signal Hill, Coalition for Practical Regulation, Construction Industry Coalition on Water Quality, County Sanitation Districts, Gateway Chambers Alliance, Los Angeles Area Chamber of Commerce, Los Angeles/Orange Counties Building & Construction Trades Council, Tri-Counties Building Trades

Is/Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
SCCWRP studies on wildfires		Consider impacts of natural events when implementing WQOs	Consider exclusion of WQOs during storm events resulting from a natural disaster (fire).	City of Agoura Hills/ City of Westlake/ City of Calabasas/Executive Advisory Committee
SCCWRP studies on wildfires		Consider impacts of natural events when implementing WQOs	Develop implementation provisions to allow for exceedances of certain water quality objectives, including metals, nutrients, mineral quality objectives, and certain organic pollutants such as PAHs and dioxin, as a result of wildfires.	City of Los Angeles
SCCWRP studies on wildfires		natural events on water quality	Consider background levels of metals, dioxins, and other regulated constituents from sources such as forest fires in evaluating the Basin Plan's water quality standards, particularly for Bell Creek, Dayton Canyon Creek, Arroyo Simi, Calleguas Creek, and the Los Angeles River.	The Boeing Company
SCCWRP studies on wildfires		Evaluate WQOs in light of impacts of natural events on water quality	Amend water quality objectives to specify that extreme events (e.g., fires, drought) beyond a discharger's control may result in exceedances. Relevant to metals, nutrients, mineral quality objectives, and certain organic pollutants, such as PAHs and dioxin.	

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
State Policy	Reclaimed Water Discharge	Develop policy/guidance	Include provisions to address the discharge of reclaimed water in the basin plan.	Monterey Park
State Policy	Recycled Water	Develop policy/guidance		
State Policy	Recycled Water	Develop policy/guidance	Develop a comprehensive plan, policy, or guidance regarding the use of reclaimed water and reuse of storm water. Address conflicts between goal to reuse/recycle more water and existing WQO. Implement provisions to facilitate 'maximum benefit' analyses	City of Calabasas/Executive Advisory Committee
	Recycled Water	Develop policy/guidance	Where appropriate and necessary (e.g., where groundwater objectives may preclude reuse), consider establishing groundwater basin salinity management plans	City of Calabasas/Executive Advisory Committee

Will Issue be addressed by another program?	Basin Plan Category	General Issue	Specific Issue	Commenter
	Recycled Water	Develop policy/guidance	Promote the use of more recycled water by establishing an approach to adjusting mineral quality objectives as appropriate to promote use when conflicts exist (e.g., using a 'maximum benefit' and 'antidegradation' approach). Clarify the approach to implementing mineral quality objectives when concentrations in source water (e.g., imported water) exceed objectives; this may require a 'maximum benefit' approach	Executive Advisory Committee
	Stormwater Reuse	Develop policy/guidance	Include in the Basin Plan policies that encourage the capture and reuse of urban runoff and storm water, while being consistent with the requirements placed on local government by of SB-375 (climate change legislation).	City of Downey/City of Signal Hill
Statewide Water Recycling Policy	Stormwater Reuse	Develop policy/guidance	Promote and encourage full reuse of non-storm water flows (median base- flow+25%) for direct and indirect water sources for municipal supplies and groundwater recharge for storage and recovery for MUN uses.	The Sierra Club Angeles Chapter
	Recycled Water	Incorporation by reference	Make Basin Plan consistent with any new State policy on recycled/reclaimed water use.	Executive Advisory Committee