

GUIDELINES FOR CONDUCTING REASONABLE ASSURANCE ANALYSIS IN A WATERSHED MANAGEMENT PROGRAM, INCLUDING AN ENHANCED WATERSHED MANAGEMENT PROGRAM

The Regional Board adopted Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Order No. R4-2012-0175 (NPDES Permit No. CAS004001). As required in the permit, Part VI.C.5.b.iv.(5), permittees electing to develop a watershed management program (WMP) or enhanced watershed management program (EWMP) are required to submit a Reasonable Assurance Analysis (RAA) as part of their draft E/WMP to demonstrate that applicable water quality based effluent limitations and receiving water limitations shall be achieved through implementation of the watershed control measures proposed in the E/WMP. This guidance document is prepared to provide information and guidance to assist permittees in development of the RAA. This document provides clarification of the regulatory requirements of the RAA along with recommended criteria for the permittees to follow to prepare an appropriate RAA for Regional Board approval.

A. APPLICABLE INTERIM AND FINAL REQUIREMENTS:

Per Part VI.C.5.a of the permit, and based on an evaluation of existing water quality conditions, permittees shall classify and list water body-pollutant combinations into one of the following three categories within their draft E/WMP:

- Category 1 (Highest Priority): Water body-pollutant combinations for which water quality-based effluent limitations and/or receiving water limitations are established in Part VI.E TMDL Provisions and Attachments L through R of the MS4 Permit.
- Category 2 (High Priority): Pollutants for which data indicate water quality impairment in the receiving water according to the State Board's Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (State Listing Policy) and for which MS4 discharges may be causing or contributing to the impairment.
- Category 3 (Medium Priority): Pollutants for which there are insufficient data to indicate water quality impairment in the receiving water according to the State's Listing Policy, but which exceed applicable receiving water limitations contained in this Order and for which MS4 discharges may be causing or contributing to the exceedance.

Permittees shall identify the water quality priorities within each watershed management area (WMA) that will be addressed by the E/WMP in order to achieve applicable water quality limitations (i.e., WQBELs and RWLs) within the timeframes established by the corresponding compliance schedules set forth in Attachments L-R, or where there is no specific compliance schedule contained in Attachments L-R, the compliance schedule set forth in the E/WMP. For watershed priorities related to addressing exceedances of RWLs in Part V.A and not otherwise addressed by Part VI.E, proposed compliance schedules must adhere to the requirements of Part VI.C.5.c.iii.(3). For watershed priorities related to achieving WLAs in USEPA established TMDLs, proposed compliance schedules must adhere to the requirements of Part VI.E.3.c.iii-v.

Permittees may choose to further subcategorize water body-pollutant combinations within the three main categories above for purposes of sequencing implementation of watershed control measures in the most effective manner possible, taking into consideration compliance deadlines and opportunities to address multiple pollutants within a water body with similar watershed control measures. This is consistent with the

permit provisions in Parts VI.C.2 and VI.C.3, which group pollutants for purposes of complying with the RWLs Provisions according to whether the pollutant is being addressed by a TMDL, is similar in its fate/transport characteristics and effective implementation measures to a pollutant being addressed by a TMDL, is currently listed on the 303(d) list, or exhibits only occasional exceedances in the receiving water. For example, permittees may wish to identify which water body-pollutant combinations in Categories 2 and 3 above are similar to a water body-pollutant combination in Category 1, and could therefore be addressed simultaneously with the water body-pollutant combination in Category 1. Permittees are invited to discuss with Regional Board staff, and solicit early input on, approaches to further subcategorization of water body-pollutant combinations.

B. CURRENT/EXISTING POLLUTANT LOADING ASSOCIATED WITH CURRENT BEST MANAGEMENT PRACTICES (BMPs)/MINIMUM CONTROL MEASURES (MCMs)

- Permittees shall provide a list and map of known and suspected storm water and non-storm water pollutant sources discharging to MS4 and from the MS4 to receiving waters and any other stressors related to MS4 discharges causing or contributing to the impairments. The map must include all MS4 “major outfalls”¹, major structural controls of storm and non-storm water² (including, but not limited to, low flow diversions, urban runoff treatment facilities, detention and retention basins used for storm water treatment, VSS devices, other catch basin inserts/screens) that discharge to receiving waters within the watershed management area. A separate tabular list of major structural controls should also be provided. Permittees shall also provide list of non-structural controls that are currently implemented within the area(s), the results of which will be assumed to be reflected in the baseline pollutant loading.³
- Permittees shall provide an initial assessment of current/baseline pollutant loading for water body-pollutant combinations identified in Section A. Current/baseline pollutant loading shall based on relevant subwatershed data and the best available representative land use and pollutant loading data collected within the last 10 years. Appropriate data sources for use in assessment of baseline pollutant loading are identified in the tables below. At a minimum, baseline pollutant loadings shall be assessed and reported considering variability in pollutant loading at a spatial and temporal (including critical condition) scale consistent with that used in the TMDL and in the approved monitoring plan (i.e., for each subwatershed that was identified/analyzed/modeled in the TMDL and for each compliance monitoring location identified in the approved monitoring plan).
- Baseline loading shall be estimated using metrics derived from long-term historical data (e.g., annual rainfall, flow/runoff volume, pollutant loading, pollutant concentrations over the past 10 years) using calibrated dynamic model results for each subwatershed area. Such baseline loading estimates shall be generated for both (1) critical conditions (consistent with applicable TMDLs) and (2) average conditions for metrics related to quantity and quality (see examples of metrics, above). Critical conditions for baseline estimates shall be based on:
 - I. Baseline flow rates/runoff volumes shall be based on one of the following:
 - a) 90th percentile of long term estimated/modeled flow rates; or
 - b) Other established critical condition in the applicable TMDL; or
 - c) Runoff volume from the 85th percentile, 24-hour rainfall event (for modeled drainage areas where retention based BMPs will capture 100% of the required volume).

¹ Per definition in federal regulations.

² Spatial metadata must include delineation of drainage area treated where available, maximum volume of non-stormwater/stormwater treated, type of control, pollutants addressed, name and contact information of owner and, if different, operator in charge of O&M.

³ It is assumed that these BMPs include full implementation of the 2001 Permit Storm Water Management Program elements as well as the structural BMPs identified in the first bullet.

- II. Baseline pollutant loading shall be based on one of the following:
 - a) 90th percentile of long term pollutant loading/concentration (considering at least the most recent 10 years of available data); or
 - b) Long term average pollutant loading/concentration (considering at least the most recent 10 years of available data) that also incorporates the coefficient of variation so as to take the variability of pollutant loading into account. Consideration of variability must be sufficient to capture the baseline condition and required pollutant reductions under the critical condition. Where long-term average pollutant loading/concentration is used, critical conditions may be described using the long-term average loading with a coefficient of variation (CV) to take the variability of pollutant loading into account. For this type of critical condition, the reported pollutant loading in each subwatershed should be established by using a variability factor (VF) for model-predicted volumes, concentrations, and/or loads obtained from the long-term average and CV with the selected probability distribution of the pollutant loading. Procedures for the detailed calculation of variability factors for different probability distributions are described in Appendix E of the Technical Support Document for Water Quality-based Toxics Control (EPA/505/2-90-001, March 1991). It is anticipated that log-normal distributions will be assumed. If a different type of critical condition is applied (e.g. 90th percentile wet year), then CV and VF calculations are not required.
 - c) Pollutant event mean concentrations (EMCs) based on land use types from recommended data sources as referenced in table below may be used to estimate baseline pollutant loading; however, they must be used in combination with one of the critical conditions for flow rate/runoff volume identified in Part I, above.

 - The estimated pollutant loading and/or concentrations shall be consistent with event mean concentrations (EMCs) obtained from different land use site as referenced in dependable sources, some of which are listed below:
- | Source No. | Reference |
|------------|---|
| 1. | Sources, patterns and mechanisms of storm water pollutant loading from watersheds and land uses of the greater Los Angeles area, California, USA. 2007. ED Stein, LL Tiefenthaler, KC Schiff. Technical Report 510. Southern California Coastal Water Research Project. Costa Mesa |
| 2. | Levels and patterns of fecal indicator bacteria in stormwater runoff from homogenous land use sites and urban watersheds. Request Only. 2011. LL Tiefenthaler, ED Stein, KC Schiff. Journal of Water and Health 9:279-290 |
| 3. | Los Angeles County 2006 EMC Report |

If a permittee(s) selects to use other independent sources of pollutant loading data in the RAA, the permittee(s) shall assure that the source(s) selected has appropriate documentation, is current, and is publicly available. The permittee(s) shall be required to provide the rationale used to support their

selection of baseline pollutant loading data as well as the raw data and all associated QA/QC information for Regional Board review and approval.

- Baseline pollutant loading should be expressed on a pollutant-by-pollutant basis consistent with the relevant averaging period(s) / duration as expressed in the TMDL and Attachments L-Q. If the pollutant is not addressed by a TMDL, but TMDLs for that pollutant exist for other water bodies, permittees should express pollutant loading in terms of averaging period(s) / duration consistent with those other TMDLs.

C. ESTIMATED REQUIRED POLLUTANT REDUCTIONS TO MEET THE INTERIM AND/OR FINAL ALLOWABLE POLLUTANT LOADING(S)

- Permittees shall provide estimated allowable loadings from MS4 discharges expressed as concentration-based or mass-based in consideration of critical conditions. Mass-based allowable loading will be calculated based on a permittee's proportion of the watershed management area for required WQBELs. Mass-based allowable loading should be calculated for each subwatershed area identified in Section B, above.
- The difference between the current and allowable pollutant loading at each implementation deadline is the required pollutant reduction at each implementation deadline. The required pollutant reduction should be calculated based on both long-term average annual condition and the selected critical condition (as described in Section B). For modeled drainage areas where 100% of the runoff volume from the 85th percentile, 24-hour storm event is not retained, the required pollutant reduction shall be used to set targets/goals for BMPs/watershed control measures within that subwatershed area. The percent reductions to be used to set targets/goals will be dependent on the phase(s) of implementation to be addressed, as described in Section E.
- Estimated allowable loading and required reductions should be expressed on a pollutant-by-pollutant basis consistent with the relevant averaging period(s)/duration (including the selected critical condition) consistent with the TMDL and Attachments L-Q. Where a TMDL has not been developed for the water body-pollutant combination, permittees should select an averaging period/duration/critical condition consistent with that used in other TMDLs that have been developed for the pollutant in other water bodies within the region.

D. SELECTED IMPLEMENTATION/BMPs OPTIONS

Permittees shall identify strategies, control measures, and BMPs to implement through their selected storm water management programs as listed below. As a starting point, selected control measurements should be designed and maintained to treat storm water runoff from the 85th percentile, 24-hour storm where feasible and necessary to achieve applicable WQBELs and receiving water limitations.

I. ENHANCED WATERSHED MANAGEMENT PROGRAM (EWMP)

a) DETAILED DESCRIPTION OF DRAINAGE AND RETENTION SYSTEMS

If the permittees select to develop a EWMP that includes projects that retain all non-storm water runoff and all storm water runoff from the 85th percentile, 24-hour storm event for the drainage areas tributary to the projects, the permittees are required to provide a detailed description of each regional multi-benefit retention system including type (bioretention system, sub-surface chamber, etc.), drainage area addressed, storage volume, and approximate system size as well as a description and quantification, where possible, of other benefits (e.g., amount of water recharged to groundwater for water supply, etc.).

b) PROPOSED WATERSHED CONTROL MEASURES TO CONTROL STORM AND NON-STORM WATER DISCHARGES

In drainage areas within the EWMP area where retention of 85th percentile, 24-hour storm event is not pursued, the permittees are required to identify watershed control measures that will be implemented in addition to existing BMPs to prevent or eliminate non-storm water discharges that are a source of pollutants to receiving waters, and to achieve all applicable interim and final water quality-based effluent limitations and all receiving water limitations. Watershed control measures may include:

- i. Structural and/or non-structural controls and operation and maintenance procedures that are designed to achieve applicable water quality-based effluent limitations and receiving water limitations;
- ii. Retrofitting areas of existing development known or suspected to contribute to the highest water quality priorities with regional or sub-regional controls or management measures; and
- iii. Stream and/or habitat rehabilitation or restoration projects where stream and/or habitat rehabilitation or restoration are necessary for, or will contribute to, demonstrable improvements in the physical, chemical, and biological receiving water conditions and restoration and/or protection of water quality standards in receiving waters.

c) STORM WATER MANAGEMENT PROGRAM MINIMUM CONTROL MEASURES (MCMs), NON-STORM WATER DISCHARGE CONTROLS, AND OTHER STRUCTURAL CONTROL MEASURES

Per Part VI.C.5.b.iv.(1), permittees shall assess the MCMs as defined in Part VI.D.4, Part VI.D.5, Part VI.D.6, Part VI.D.8, Part VI.D.9 and Part VI.D.10 of the MS4 Permit and potential modifications that will most effectively address priority issues in each watershed. Based on this assessment, permittees may choose to propose customized actions and corresponding schedules within each of the abovementioned minimum control measure categories. (Alternatively, permittees may choose to implement the baseline provisions within one or more of the abovementioned MCM categories.)

Per Part VI.C.5.b.iv.(2), where non-storm water discharges from the MS4 are identified as source of pollutants, permittees shall identify and list control measures, BMPs, and other strategies to effectively eliminate the source of pollutants consistent with the requirements of Part III.A and Part VI.D.4.d (for the LACFCD) and Part VI.D.10 (for all other permittees).

For TMDL related control measures, per Part VI.C.5.b.iv.(3), permittees shall also compile a list of control measures that have been identified in TMDLs and corresponding implementation plans, and identify those control measures within these TMDLs/implementation plans to be modified, if any, to most effectively address TMDL requirements in Part VI.E and Attachments L-Q. If actions identified in the E/WMP are wholly replacing the control measures identified in the TMDL implementation plan, it can be noted as such and this list is not necessary. If not sufficiently identified in previous documents (TMDLs/implementation plans), the permittees shall evaluate and identify the control measures that will be implemented to achieve the applicable WQBELs/WLAs/RWLs associated with these TMDLs. Initially, control measures should be designed to address the volume within the drainage area associated with the 85th percentile, 24-hour storm event at the correspondence compliance point.

II. WATERSHED MANAGEMENT PROGRAM (WMP)/INDIVIDUAL WMP

a) PROPOSED WATERSHED CONTROL MEASURES TO ADDRESS CONTRIBUTIONS OF STORM WATER DISCHARGES TO RECEIVING WATER

The permittees are required to identify watershed control measures that will be implemented in addition to existing BMPs to prevent or eliminate non-storm water discharges that are a source of pollutants to receiving waters, and to achieve all applicable interim and final water quality-based effluent limitations and all receiving water limitations. (See section D.I.b. for detail.)

b) STORM WATER MANAGEMENT PROGRAM MINIMUM CONTROL MEASURES (MCMs)

See section D.I.c. for detail.

E. SPECIFIED SCHEDULE OF SELECTED WATERSHED MANAGEMENT STRATEGIES

Permittees shall translate corresponding schedules for selected BMPs into a combined schedule for achievement of the applicable interim and final water quality-based effluent limitations and/or receiving water limitations per the water body classification/prioritization above. Permittees shall align the combined schedule with interim milestones and interim and final compliance deadlines specified in the permit and demonstrate that the required loading reduction and timeline specified are expected to be achieved.

- Permittees shall identify interim milestones and dates for their achievement to ensure adequate progress toward achieving interim and final water quality-based effluent limitations and/or receiving water limitations deadlines identified in TMDL provisions in Part VI.E and attachments L - Q. If selected BMPs will address multiple pollutants then BMPs must be implemented within time frame that is consistent with the most critical/closest deadline.
- Where the TMDL does not include interim or final water quality-based effluent limitations and/or receiving water limitations with compliance deadlines *during the permit term*, Permittees shall identify interim milestones and dates for their achievement to ensure adequate progress toward achieving interim and final water quality-based effluent limitations and/or receiving water limitations with deadlines beyond the permit term.
- For interim WQBELs and/or receiving water limitations, the percent reduction based on annual average baseline loading may be used to set targets/goals for BMPs/watershed control measures where such percent reduction based on the annual average baseline loading is consistent with interim requirements as set forth in Part VI.E and Attachments L-Q. A gradual phasing of percent load reduction for interim WQBELs/RWLs to final WQBELs/RWLs shall be applied over the course of the implementation schedule. For areas to be addressed through retention of the runoff volume from the 85th percentile, 24-hour storm, volume reductions over time shall be related to the interim and final deadlines.
- Permittees shall demonstrate that the activities and control measures identified in the Watershed Control Measures will achieve applicable receiving water limitations for water body-pollutant combinations not addressed by TMDLs as soon as possible. Per Part VI.C.5.c.ii and Part VI.C.4.c.iii.(3), Permittees must propose milestones based on measurable criteria and a schedule with dates for achieving the milestones that will allow progress to be measured once every two years.

F. POLLUTANT REDUCTION PLAN

a) COMPLIANCE DETERMINATION

- Compliance points shall be located at all compliance points required in the TMDLs that are within the area covered by the E/WMP.
- For a Permittee implementing an individual WMP, appropriate compliance point(s) within their jurisdiction shall be identified for Regional Board approval.

- Permittees shall include an appropriate compliance point(s) to assess the MS4 discharge(s) from the area covered by the Watershed Management Program to the Receiving Water(s)

b) EVALUATION OF SELECTED MANAGEMENT PROGRAM/BMPs PERFORMANCE

- Permittees shall provide a detailed description of individual BMPs performance and /or suite of selected BMPs performance to reduce pollutant loadings that are used as model inputs. Data on performance of watershed control measures shall be drawn only from peer-reviewed sources.
- The estimated effectiveness of BMPs in pollutant removal and/or reduction will serve as a default value that can be updated through the adaptive management process with BMP monitoring data and outfall monitoring data when they become available.

c) ANALYSIS TO DEMONSTRATE SELECTED BMPs HAVE REASONABLE ASSURANCE TO MEET INTERIM/FINAL REQUIREMENTS

Based on the analysis of BMP performance using the selected modeling system, Permittees shall demonstrate that:

- Implementation of current/selected activities and control measures identified in section D above will achieve applicable water quality-based effluent limitations and/or receiving water limitations in Part VI.E and Attachments L-Q.

Although the Permit only requires the RAA to consider WQBELs and receiving water limitations with interim and final deadlines/milestones that fall within the Permit term, it is strongly recommended that the RAA assess WQBELs and RWLs with deadlines occurring between program approval and December 28, 2022. Additionally, Where the TMDL does not include interim or final water quality-based effluent limitations and/or receiving water limitations with compliance deadlines *during the permit term*, Permittees must identify interim milestones and dates for their achievement to ensure adequate progress toward achieving interim and final water quality-based effluent limitations and/or receiving water limitations with deadlines beyond the permit term and must include these in the RAA.

- For water-body pollutant combinations not addressed by TMDLs, the activities and control measures identified in the Watershed Control Measures will achieve applicable receiving water limitations per Part V.A.

Permittees shall provide model output for each deadline specified in Attachments L-Q within the permit term to demonstrate compliance with each deadline will be achieved.

d) PROCESS OF INCORPORATING ADDITIONAL BMPs IF MILESTONE ARE NOT MET AS SCHEDULED

- Permittees in each WMA shall develop an integrated monitoring program or coordinated integrated monitoring program to assess progress toward achieving the water quality-based effluent limitations and/or receiving water limitations per the compliance schedules, and progress toward addressing the water quality priorities for each WMA.
- Permittees in each WMA shall implement an adaptive management process every two years after program approval to assess progress toward (i) achieving interim and/or final water quality-based effluent limitations and/or receiving water limitations; (ii) achievement of interim milestones; (iii) re-evaluation of the water quality priorities identified for the WMA based on more recent water quality data and reassessment of sources of pollutants in MS4 discharges; and (iv) evaluation of effectiveness of the control measures based on new information and data.

- Permittees shall report and then implement any modifications to the WMP or EWMP based on the results of the adaptive management process to improve the effectiveness of WMP or EWMP in reducing pollutant loading upon approval by the Regional Executive Officer, or within 60 days of submittal if the Regional Water Board Executive Officer expresses no objections.

G. MODELING REQUIREMENTS FOR REASONABLE ASSURANCE ANALYSIS TO SUPPORT ESTIMATION OF CURRENT LOADINGS, REQUIRED LOAD REDUCTIONS AND ANALYSIS OF WATER QUALITY OUTCOMES OF SELECTED BMPs OPTIONS

Permittees shall provide a modeling system to support the estimation of baseline loadings, required load reductions that are used to set targets/goals for selected BMPs/watershed control measures, and to demonstrate that the activities and watershed control measures identified/selected in the E/WMP will achieve applicable water quality-based effluent limitations and receiving water limitations.

The models appropriate for conducting the required RAA described above are listed in **Table 1**. These models are selected based on the following model capabilities:

- (1) Dynamic continuous long-term simulation for modeling pollutant loadings, flows, and concentrations in receiving water from lands in a watershed system.
- (2) Can represent rainfall and runoff processes above soil surface, and baseflow contributions in subsurfaces of urban and natural watershed systems.
- (3) Can represent variability in pollutant loadings, based on land use, soil hydrologic group, and slope.
- (4) BMP process based approach or empirically based BMP approach.
- (5) Decision support to evaluate BMP performance

Permittees may select a combination of the models listed in model type 1.1-1.3 of Table 1 for land/watershed, receiving water, and BMP performance models, or select one of the modeling systems from integrated modeling systems listed in model type 1.4 of Table 1.

Table 1. List of Available Models

Model Type	Available Models
1.1 Land/Watershed Models	
	HSPF, LSPC, SWMM, WARMF
1.2 Receiving Water Models	
	EFDC, CE-QUAL-ICM/TOXI, QUAL2K, WASP, HSPF, LSPC, SWMM
1.3 BMP Performance Models	
* Process based models	SWMM BMP model BASINS BMP model EPA SUSTAIN model
* Empirically based models	International Stormwater BMP Database

Model Type	Available Models
1.4 Integrated BMP Modeling Systems	
* Process based models	EPA SUSTAIN model Los Angeles County WMMS model EPA TMDL Modeling Toolbox
* Empirical based models	City of Los Angeles SBPAT model

The modeling requirements consist of four primary components which are described as in the following Tables. The four components of modeling requirements are general model input data (Table 2), model parameters (Tables 3.1-3.3), BMP performance parameters (Tables 4.1-4.2), and model output (Table 5). For model parameters and BMP performance parameters, two separate tables are provided for a process based BMP model and an empirically based BMP model. It should be noted that the model requirements are the minimum requirements for a BMP performance evaluation since the specific performance measures vary depending on the designated use of the water body and the condition of the water body. Permittees shall cover all necessary requirements for a BMP performance evaluation based on input and recommendations from the TAC as approved by the Regional Board. With regard to the spatial scale, the highest resolution GIS layers should be used to satisfy the homogeneous assumption in a computationalmodeled subwatershed. For temporal scale, the model should use varying time steps with a minimum 1-hour or shorter time step during rainfall events to capture peak flow and a daily or shorter time step between rainfall events.

The RAA associated with the permittee(s) draft E/WMP should include a detailed description/itemization of model inputs and outputs as indicated in Table 2 through Table 5 and should include model input files (in an electronic format that can be manipulated) as part of the draft E/WMP package submitted to Regional Board for review and approval.

Table 2. General Model Input Data for Both Process Based BMP Models and Empirically Based BMP Models

For General Model	Data Source	Data Period
2.1 Geometric Data		
• GIS Data Layer	State of California GeoPortal, Cal-Atlas Geospatial Data Library (previously CalsIL – California Spatial Information Library)/CERES and other public agencies	Most recent
• Topography Layer (DEM Data)	USGS National Elevation Dataset (NED) or	Most recent

For General Model	Data Source	Data Period
	locally derived data	
• Land Use/Land Cover Layer ⁵	SCAG Land use data; Multi-Resolution Land Characteristics Consortium (MRLC) National Land Cover Database (NLCD) or locally derived data	SCAG Land use data (2005 or most recent); NLCD (2006 or most recent)
• Stream Network	USGS National Hydrography Dataset (NHD) or locally derived data	Most recent
• Drainage areas	USGS Watershed Boundary Dataset (WBD) or locally derived data	Most recent
2.2 Meteorological Data		
• Precipitation	NOAA National Climatic Data Center (NCDC) or locally derived data	at least 10 years hourly
• Evaporation	NCDC or locally derived data	at least 10 years daily/monthly
2.3 Soil Hydrologic Data		
• Hydrologic soil groups	USDA/NRCS - Soil Survey Geographic Database (SSURGO)/ STATSGO2 or locally derived data	Most recent
• Percent of area distribution for different soil groups.	SSURGO or locally derived data	Most recent
• Fraction of sand, silt, and clay for different soil groups.	SSURGO or locally derived data	Most recent
• Average Slope	SSURGO or locally derived data	Most recent
• Vegetative cover for different soil groups.	SSURGO or locally derived data	Most recent

⁵ Satellite imagery may be utilized but is not required.

For General Model	Data Source	Data Period
2.4 Hydrologic Data		
• In-stream Flow	USGS and locally derived data	Daily/monthly/hourly based on availability
• In-stream Depth	USGS and locally derived data	Daily/monthly/hourly based on availability
2.5 Point Source Data		
• Point Source Location	EPA STORET data CIWQS/SMARTS or local sampling	All available data
• Point Source Discharge	EPA STORET data CIWQS/SMARTS or local sampling	Daily/monthly
• Point Source Concentration	EPA STORET data CIWQS/SMARTS or local sampling	Daily/monthly

To demonstrate the ability to predict the effect of watershed processes and management on land, soil, and receiving water body, model calibration and validation are necessary and critical steps in model application. The acceptable model calibration criteria as listed in Table 3.0 are provided to ensure the calibrated model properly assesses all the model parameters and modeling conditions that can affect model results. In addition, some valuable sources of initial starting values for many of the key calibration parameters are provided in Table 3.1 through Table 4.2 to facilitate model calibration efforts.

Table 3.0 Model Calibration Criteria

Model calibration is necessary to ensure that the calibrated model properly assesses all the variables and conditions in a watershed system. Calibration should result in model parameter values that produce the best overall agreement between simulated and observed values throughout the calibration period. Table 3.0 is a list of model calibration tolerances for different levels of agreement or accuracy based on extensive past experience with the HSPF model. The lower bound of “fair” level of agreement listed in Table 3.0 is considered a target tolerance for the model calibration process. If model calibration results do not satisfy the target tolerances, additional efforts should be completed to investigate possible errors in, and the accuracy of, input data, model formulations, and field observations. The findings of this investigation should be presented in the RAA description, along with any immediate remedial actions to address the issues and/or recommended approaches to improve the calibration in the future. Permittees are strongly encouraged to engage Regional Board staff prior to the draft E/WMP submittal, in order to facilitate review and approval.

Model parameters	% Difference between simulated and observed values		
	Very Good	Good	Fair (lower bound, upper bound)
Hydrology/Flow	<10	10-15	15-25
Sediment	<20	20-30	30-45
Water Temperature	<7	8-12	13-18
Water Quality/Nutrients	<15	15-25	25-35
Pesticides/Toxics	<20	20-30	30-40

Based on HSPF experience by A.S. Donigian, Jr., prepared for USEPA (2000)

Table 3.1 Model Parameters for Process Based BMP Models

Model Parameters	Data Source ⁶	Range of Initial Values
3.1.1 Hydrology Parameters		
• Fraction forest cover	EPA BTN#6	0-0.95
• Interception storage capacity (in)	EPA BTN#6	0.01-0.40
• Retention storage capacity (in)	EPA BTN#6	0.01-0.30
• Manning's n for overland flow	EPA BTN#6	0.01-0.15
• Upper zone nominal soil moisture storage (in)	EPA BTN#6	0.05-2.0
• Saturated hydraulic conductivity (in/hr)	Green-Ampt Parameters	0.01-4.74
• Wetting front suction head (in)	Green-Ampt Parameters	1.93-12.6
• Upper zone soil porosity (fraction)	Green-Ampt Parameters	0.398-0.501
• Field capacity (fraction)	Green-Ampt Parameters	0.062-0.378

⁶ EPA BTN # : EPA Basins Technical Note #

• Wilting point (fraction)	Green-Ampt Parameters	0.024-0.265
• Temp below which ET is reduced by half (°F)	EPA BTN#6	32.0-48.0
• Temp below which ET is set to zero (°F)	EPA BTN#6	30.0-40.0
• Fraction of GW inflow to deep recharge	EPA BTN#6	0.0-0.50
• Fraction of remaining ET from baseflow	EPA BTN#6	0.0-0.20
• Fraction of remaining ET from active GW	EPA BTN#6	0.0-0.20
• Lower zone nominal soil moisture storage (in)	EPA BTN#6	2.0-15.0
• Interflow inflow parameter	EPA BTN#6	1.0-10.0
• Interflow recession parameter	EPA BTN#6	0.3-0.85
• Lower zone ET parameter	EPA BTN#6	0.1-0.9
3.1.2 Water Quality Parameters		
• Initial storage of water quality constituent on land surface (lb)	LA County Report ⁷	0.0-0.0005
• Wash-off potency factor for sediment associated constituent (lb/ton)	EPA BTN#6	0.0-10.0
• Scour potency factor for sediment associated constituent (lb/ton)	EPA BTN#6	NA
• Accumulation rate of water quality constituent of land surface(lb/acre/day)	EPA BTN#6	0.0-0.0005
• Maximum storage of water quality constituent on land surface(lb/acre/day)	EPA BTN#6	0.0-0.0005
• Rate of surface runoff that removes 90% of stored water quality constituent (in/hr)	EPA BTN#6	0.0-0.5
• General first order in-stream loss rate of constituent (1/day)	SUSTAIN manual	0.2-0.2
3.1.3 Sediment Parameters		

⁷ LA County Report*: "Evaluation of Existing Watershed Models for the County of Los Angeles", August 29, 2008

• For pervious land		
• Coefficient in the soil detachment equation	EPA BTN#8	0.05-0.75
• Exponent in the soil detachment equation	EPA BTN#8	1.0-3.0
• Coefficient in the sediment wash-off equation	EPA BTN#8	0.1-10.0
• Exponent in the sediment wash-off equation	EPA BTN#8	1.0-3.0
• Coefficient in the sediment scour equation	EPA BTN#8	0.0-10.0
• Exponent in the sediment scour equation	EPA BTN#8	1.0-5.0
• For impervious land		
• Coefficient in the solids wash-off equation	EPA BTN#8	0.1-10.0
• Exponent in the solids wash-off equation	EPA BTN#8	1.0-3.0
• Solids accumulation rate on the land surface (lb/ac-day)	EPA BTN#8	0.0-30.0
• Fraction of solids removed from land surface per day (1/day)	EPA BTN#8	0.01-1.0

Table 3.2 Model Parameters for Empirically Based BMP Models

Model Parameters	Data Source	Range of Values
3.2.1 Hydrology Parameters		
• Interception storage capacity (in)	EPA BTN#6	0.01-0.40
• Retention storage capacity (in)	EPA BTN#6	0.01-0.30
• Manning's n for overland flow	EPA BTN#6	0.05-0.5
• Upper zone nominal soil moisture storage (in)	EPA BTN#6	0.05-2.0
• Saturated hydraulic conductivity (in/hr)	Green-Ampt Parameters	0.01-4.74
• Wetting front suction head (in)	Green-Ampt Parameters	1.93-12.6
• Upper zone soil porosity (fraction)	Green-Ampt Parameters	0.398-0.501
• Field capacity (fraction)	Green-Ampt Parameters	0.062-0.378
• Wilting point (fraction)	Green-Ampt Parameters	0.024-0.265
• Temp below which ET is reduced by half (°F)	EPA BTN#6	32.0-48.0
• Temp below which ET is set to zero (°F)	EPA BTN#6	30.0-40.0
• Fraction of remaining ET from baseflow	EPA BTN#6	0.0-0.20
• Lower zone nominal soil moisture Storage (in)	EPA BTN#6	2.0-15.0
• Interflow inflow parameter	EPA BTN#6	1.0-10.0
• Interflow recession parameter	EPA BTN#6	0.3-0.85
• Lower zone ET parameter	EPA BTN#6	0.1-0.9
B.3.2.2 Water Quality Parameters		
• Event Mean Concentration (EMC)	SBPAT User's Guide t	See Table 3.3
B3.2.3 Sediment Parameters		
For pervious land		

• Coefficient in the soil detachment equation	EPA BTN#8	0.05-0.75
• Exponent in the soil detachment equation	EPA BTN#8	1.0-3.0
• Coefficient in the sediment wash off equation	EPA BTN#8	0.1-10.0
• Exponent in the sediment wash-off equation	EPA BTN#8	1.0-3.0
• Coefficient in the sediment scour equation	EPA BTN#8	0.0-10.0
• Exponent in the sediment scour equation	EPA BTN#8	1.0-5.0
For impervious land		
• Coefficient in the solids wash-off equation	EPA BTN#8	0.1-10.0
• Exponent in the solids wash-off equation	EPA BTN#8	1.0-3.0
• Solids accumulation rate on the land surface (lb/ac-day)	EPA BTN#8	0.0-30.0
• Fraction of solids removed from land surface per day (1/day)	EPA BTN#8	0.01-1.0

Table 3.3 Suggested Averageⁱ EMC by land use for selected pollutants

Land Use	Nitrate (mg/L)	Total Copper ($\mu\text{g}/\text{L}$)	Total Lead ($\mu\text{g}/\text{L}$)	Total Zinc ($\mu\text{g}/\text{L}$)	Fecal Coliform (MPN/100ml)	TSS (mg/L)
Agriculture	34.4	100.1	30.2	274.8	6.03E+4	999
Commercial	0.55	31.4	12.4	237.1	7.99E+4	67.0
Educational	0.61	19.9	3.6	117.6	7.99E+4	99.6
Industrial	0.87	34.5	16.4	537.6	3.76E+3	219
Transportation	0.74	52.2	9.2	292.9	1.68E+3	77.8
Open Space	1.17	10.6	3.0	26.3	6.31E+3	216.6
SF Residential	0.78	18.7	11.3	71.9	3.11E+4	124.2
MF Residential	1.51	12.1	4.5	125.1	1.18E+4	39.9

Source: Technical Appendices "A User's Guide for the Structural BMP Prioritization and Analysis Tool (SBPAT v1.0)" for Los Angeles City, County, and Heal the Bay, December 2008

Note: These suggested average EMC values can be adjusted based on calibration studies by using more recently collected Southern California data.

Table 4.1 Suggested BMP Performance Parameters for Process Based BMP Model

4.1 BMP Performance Parameters		Rain Barrel	Bio-Retention	Porous Pavement	Dry Infiltration Basin
• Media final constant infiltration rate (in/h)		NA	0.5-0.5	0.5-1.0	1.0-1.0
• Substrate layer porosity		NA	0.4-0.5	0.45-0.5	0.3-0.4
• Substrate layer field capacity		NA	0.25-0.3	0.055-0.2	0.06-0.3
• Substrate layer wilting point		NA	0.1-0.15	0.05-0.05	0.02-0.15
• Underdrain gravel layer porosity		NA	0.5	0.5	0.5
• Vegetative parameter, A		NA	0.6-1.0	1.0	0.6
• Underdrain background infiltration Rate (in/hr)		NA	0.1-0.3	0.1	0.25-0.3
• TSS 1 st order decay rate (1/day)		0.2-0.8	0.2-0.8	0.2-0.8	0.2-0.8
• Fecal Coliform 1 st order decay rate (1/day)		0.5	0.5	0.5	0.5
• TSS Filtration removal rate (%)		NA	85	60	85

* Source: PA Report "SUSTAIN-A Framework for Placement of Best Management Practices in Urban Watersheds to Protect Water Quality, September 2009, EPA/600/R-09/095

Note that values in this Table can be adjusted based on calibration studies with recently collected Southern California data.

Table 4-2: Suggested BMP Performance Parameters for Empirically Based BMP Model

Median (95% Conf. Interval) Statistics of BMP Effluent Concen.	Bio-Retention	Bio-Swale	Detention Basin	Filter Strip	Manu-factured Device	Media Filter	Porous Pavement	Retention Pond	Wetland Basin	Wetland Channel
Fecal Coliform # Per 100 mL	NA	2600-6200	500-1900	300-39600	(10,20)-D (200-3000)-F (1400-5000)-P	200-625	NA	200-1160	230-11800	NA
Enterococcus # Per 100 mL	58-437	NA	NA	NA	(10,10)-D (1750-12000)-F NA-P	NA	NA	NA	56-300	NA
E. Coli # Per 100 mL	6-137	1200-5900	82-720	NA	NA	NA	NA	31-387	199-1160	NA
TSS (mg/L)	5.0-9.0	11.8-15.3	19.0-26.0	16.0-21.5	15.0-19.9	7.4-10.0	11.0-14.4	12.0-15.0	7.0-10.9	10.0-16.0
Total Phosphorus	0.07-	0.17-	0.19-0.24	0.15-	0.10-0.13	0.08-	0.08-0.09	0.12-0.14	0.07-	0.13-

Median (95% Conf. Interval) Statistics of BMP Effluent Concen.	Bio-Retenti on	Bio-Swale	Detention Basin	Filter Strip	Manu-factured Device	Media Filter	Porous Pavement	Retentio n Pond	Wetland Basin	Wetland Channel
(mg/L)	0.1	0.20		0.20		0.10			0.09	0.17
Dissolved Phosphorus (mg/L)	0.05- 0.18	0.05- 0.11	0.08-012	0.16- 0.26	0.04-0.07	0.06- 0.09	0.04-0.05	0.06-0.07	0.03- 0.06	0.07- 0.10
Total Nitrogen (mg/L)	0.74- 0.99	0.63- 0.82	1.75-2.69	1.0-1.23	1.90-2.41	0.68- 0.99	1.28-1.65	1.19-1.36	1.04- 1.21	1.05- 1.56
Total Kjeldahl Nitrogen (mg/L)	0.46- 0.72	0.50- 0.70	1.16-1.78	0.97- 1.12	1.32-1.55	0.50- 0.61	0.74-0.90	0.98-1.10	0.92- 1.09	1.10- 1.30
NOx(NO2+NO3,a ndNO3) (mg/L)	0.19- 0.25	0.20- 0.28	0.24-0.45	0.24- 0.31	0.35-0.44	0.46- 0.57	0.59-0.77	0.15-0.20	0.05- 0.11	0.15- 0.22
Total Copper (µg/L)	4.6- 9.85	5.7- 7.7	4.0-6.80	6.4-7.9	7.94-11.0	5.1-6.6	6.8-8.1	4.06-5.0	3.0-4.0	3.61- 5.20
Total Lead (µg/L)	2.5-2.5	1.8- 2.29	2.15-4.3	1.3-2.2	3.8-5.16	1.3-2.0	1.38-2.21	2.0-3.0	1.0-1.55	1.40- 3.11
Total Zinc (µg/L)	7.7- 25.0	20- 26.6	17.1-38.2	16.0- 26.0	52.8-63.5	15.0- 20.0	12.5-16.8	20.0-23.0	16.7- 24.3	11.0- 20.0
Total Arsenic (µg/L)	NA	0.95- 1.30	1.29-1.80	0.55- 1.20	1.0-2.4	0.61- 1.0	2.5-2.5	0.54-1.15	NA	NA
Total Cadmium (µg/L)	0.25- 1.0	0.27- 0.34	0.25-0.35	0.09- 0.20	0.20-0.31	0.1-0.2	0.25-0.25	0.20-0.29	0.10- 0.20	0.19- 0.50
Total Nickel (µg/L)	NA	2.3- 4.2	2.2-3.75	2.4-3.1	3.11-5.0	2.0-2.6	1.40-1.80	2.0-2.60	NA	2.0-2.40

Source: International Stormwater BMP Database (BMPDB), July 2012

Note that for bacteria, manufactured devices are broken down into three subcategories: disinfection devices (Manufactured Device – D), inlet insert/filtration devices (Manufactured Device – F), and physical settling/straining devices (Manufactured Device – P)

Note that values in this Table can be adjusted based on calibration studies with recently collected Southern California data.

Table 5: Model Output for both Process Based BMP Models and Empirically Based BMP Models

Model Output	Output Content	Output Format
5.1 Current/Existing Pollutant Loadings		
	Current pollutant loadings at each modeled sub-watershed and each land use, under range of temporal conditions (i.e., average and critical conditions)	Tables
5.2 Load Reduction Output		
	Pollutant load reduction at each modeled sub-watershed for each BMP scenario (corresponding to applicable compliance deadlines) in dry and wet weather conditions (i.e., average and critical conditions)	Tables
	Time series plots of pollutant load reduction for each BMP scenario at compliance points	Graphics
5.3 Surface Runoff Output		

Model Output	Output Content	Output Format
	Surface runoff volume at each modeled subwatershed for each BMP scenario in dry and wet weather conditions (i.e., average and critical conditions)	Tables
	Absolute and percent reduction in runoff volume at each modeled subwatershed for each BMP scenario	Tables
5.4 Hydrographs and Pollutographs		
	Flow hydrographs at compliance points within the EWMP/WMP for each BMP scenario	Graphics
	Pollutographs at compliance points within the EWMP/WMP for each BMP scenario	Graphics
5.5 BMP Performance Summary		
	Load comparison for with and without BMPs and graphs for each BMP scenario	Tables and Graphics
	BMP storage distribution for each BMP scenario	Tables and Graphics

ⁱ Log-transformed arithmetic mean values shown