

Comment Summary and Responses

Waste Discharge Requirements for Discharges of Trash from Nonpoint Sources within the Los Angeles Region Subject to Total Maximum Daily Loads for Trash

Comment Due Date: November 6, 2025

No	Author
1	Rita Santos-Oyama
2	Anjelica Vargas
3	Kim Garvey
4	Moore Institute for Plastic Pollution Research (Win Cowger, Ph.D.)
5	Algalita Marine Research and Education (Katie Allen)
6	Surfrider Foundation – Long Beach (Sona Coffee)
7	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)
8	City of Long Beach (Councilmember Christina Duggan, Vice Mayor Roberto Uranga, Councilwoman Tunua Thrash-Ntuk)
9	Long Beach Department of Public Works (Colin Averill, PE)
10	LA Sanitation and Environment - Watershed Protection Division (Taraneh D. Nik-Khah)
11	Lower Los Angeles River Watershed Management Group (Gladis Deras)
12	CWE (Gerald Greene, DEnv, PE)
13	Blue Water Task Force -Ventura County-Surfrider (Joy Downing Riley)
14	Malibu Creek Watershed Management Program Group (Charmaine Yambao)
15	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)
16	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)
17	Ventura Land Trust (Daniel Hulst)

No		Comment	Response
1.1	Rita Santos-Oyama	Why aren't cities bordering the LA River accountable for the trash their residents throw along the river?	The 2015 Los Angeles River Trash Total Maximum Daily Load (TMDL) makes cities along the Los Angeles River responsible for trash from parks, open space and recreational facilities along the river. The cities of Arcadia, Bell Gardens, Burbank, Compton, Cudahy, Downey, Long Beach, Los Angeles, Maywood, Montebello, Pasadena, Pico Rivera, and Rosemead are specifically named in the TMDL and are subject to the proposed Waste Discharge Requirements for Discharges of Trash from Nonpoint Sources within the Los Angeles Region Subject to Total Maximum Daily Loads for Trash (Trash WDRs). An appendix has been added to the proposed Trash WDRs to make the Los Angeles

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			River Trash TMDL requirements clearer.
1.2	Rita Santos-Oyama	All cities along the LA River should be required to allocate budget funds to help our city deal with the debris.	<p>The scope of the proposed Trash WDRs is focused on nonpoint sources of trash specifically identified in one of the 11 Trash TMDLs in the Los Angeles region. As such, not all municipalities along the Los Angeles River are subject to the Proposed Trash WDRs.</p> <p>For those cities that are identified as Responsible Parties for nonpoint sources in the Los Angeles River Trash TMDL, the proposed Trash WDRs require regular collection of trash, implementation of best management practices (BMPs) to reduce the amount of trash that accumulates in waters between collection events, and regular assessments to evaluate the success of those BMPs.</p>
2.1	Anjelica Vargas	The Los Angeles River bed has not had a long-term solution in place that requires all cities along the river bed to be responsible for the trash that accumulates in the ocean and along the shores along Long Beach.	<p>The Los Angeles River Trash TMDL (https://www.waterboards.ca.gov/losangeles/water_issues/programs/tmdl/docs/R15_006_RB_BPA_LA.pdf) is a long-term plan for addressing trash in the Los Angeles River and includes cities along the river as Responsible Entities.</p>
2.2	Anjelica Vargas	There needs to be regular fees paid into a fund that addresses the downstream problem, paid into by these cities but also there needs to be a strategy in place for regular cleaning heading off the issue from the source so that it is	<p>See response to comment 1.2. The proposed Trash WDRs require regular clean-ups, BMPs and monitoring from all Responsible Entities. Those include cities upstream of Long Beach that are</p>

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		not reactive clean ups managed solely by the city of Long Beach.	named as Responsible Entities in the Los Angeles River Trash TMDL.
3.1	Kim Garvey	The burden to clean others' trash should not fall on the City of Long Beach citizens and taxpayers. The upstream entities should share this burden, which may in turn provide more motivation for their citizens and businesses to quit littering (the ultimate goal).	See response to Comment 2.2.
3.2	Kim Garvey	I support the Water Board's proposal to impose WDRs on the upstream entities who discharge trash into the L.A. River, assuming this will put more burden, more responsibility on the upstream entities. The current conditional waiver situation is not working as evidenced by the amount of trash reaching the Long Beach shoreline.	<p>Comment noted.</p> <p>While the proposed Trash WDRs are intended to improve upon the Trash Waiver's oversight of nonpoint sources of trash, please note that the amount of trash reaching the Long Beach shoreline originates from a variety of sources (point and nonpoint) and a variety of waterbodies. The conditional Trash Waiver and the proposed Trash WDRs are only addressing nonpoint sources of trash included in one of the 11 trash TMDLs in the region.</p>
4.1	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	The current report should have a clear indication of the reduction in non-point sources observed to date from the current strategy being employed in pounds per year across LA County. This would provide more guidance on whether or not the current actions across LA County have been successful.	<p>The staff report acknowledges that the success of the conditional Trash Waiver was mixed (see section 4 of the staff report).</p> <p>The Trash Waiver was only in place for five years and based on its requirements, there were three or fewer annual reports submitted for the waterbodies covered by the Waiver. As such, there are not enough data to make a meaningful analysis of long-term reductions in trash from nonpoint sources.</p> <p>As stated in the staff report, annual postings of trash data will be</p>

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			shared on the Los Angeles Water Board website so that reductions can be tracked as data continues to come in.
4.2	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	We agree that this process needs more transparency and data sharing, and agree that the data sharing proposal they are making to outline regions of nps pollution and sharing spatial files on public data portals will likely be a successful strategy for sharing high-quality data.	Comment noted.
4.3	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	There is a low success rate in reporting with the current approach, especially for the LA River watershed. The updated plan should include clear actions to be taken if this continues.	Section XI of the proposed Order addresses compliance and potential enforcement should the Responsible Parties not meet the conditions of the proposed WDRs.
4.4	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	The current proposal doesn't mention what the nonpoint source targets are or how they will be calculated. It does mention that some regions (Redondo) are well below the targets. I think it is worth revisiting the target process, given that even though places have reached these targets, we are still seeing a lot of trash flowing down the river. Our recent publication proposes a new target of 1 piece of trash per mile and provides a clear way to measure that: https://www.sciencedirect.com/science/article/pii/S0956053X2500474X	Page 3 of the proposed Order states, "The Los Angeles Region Trash TMDLs identify all known contributing sources of trash and quantify the allowable load of trash, which for these TMDLs is zero trash." The proposed Order implements that load allocation of zero, which is less than 1 piece per mile.
4.5	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	There was a mention that surveying trash costs \$10,000 per location per year. We have newer methods for surveying trash that give higher resolution at 10% of that cost: https://iopscience.iop.org/article/10.1088/1748-9326/ac3c6a	The costs included in the report were for surveying and collecting trash in areas subject to trash TMDLs. The proposed Trash WDRs allow Responsible Entities to choose their own trash assessment and collection protocols. See for example, part 8.f.4, 9.f.4, 10.f.4, etc., of the proposed Order.

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4.6	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	A caption should be added to the cover page photo, it can be misconstrued as saying the people recreating in the river is the nonpoint source issue. What we think you mean is that recreating in the water is the future we want to reach.	Comment noted. A caption has been added to the cover page photo to clarify that it is showing people recreating in the East Fork of the San Gabriel River.
4.7	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	Unclear why a surface scrubber is a highlighted BMP, this would likely only capture small pieces of trash and isn't going to address the bulk of the trash mass that a larger street sweeper would.	Addressing impairments from trash and restoring beneficial uses to waters will require a spectrum of solutions. The surface scrubber is one tool for small areas that would not accommodate a larger street sweeper. It is included to highlight alternatives available.
4.8	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	The current proposal is unclear about what monitoring practices will be recommended.	<p>Responsible Entities subject to the Trash WDRs are required to submit a Nonpoint Source Trash Assessment and Reporting Plan (NSTARP) where they will specify the monitoring and collection practices that will be used or reaffirm the existing monitoring and assessment plans. These plans will be submitted to the Los Angeles Water Board for review, and if adequate for approval.</p> <p>While the Los Angeles Water Board can require the Responsible Entities subject to the trash TMDLs to comply with the TMDLs and the Trash WDRs, the Board cannot dictate the manner in which those Responsible Entities comply.</p>
4.9	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	The current proposal doesn't mention what happens if regions do not reach the targets.	In section X of the proposed Trash WDRs, the specific provisions of each TMDL are included, each of which includes a requirement for additional Best Management Practices if trash collections do not show a decreasing trend.

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			The proposed Trash WDRs also include a section on compliance and enforcement (Section XI).
4.10	Moore Institute for Plastic Pollution Research (Win Cowger. Ph.D)	The current proposal is unclear about who will be responsible for submitting reports under the new policy.	The Responsible Entities vary by TMDL and are clearly listed under the Specific Provisions section of the proposed WDRs as part X.8.a, X.9.a, X.10.a, etc. In addition, a table of Responsible Entities has also been added to the Staff Report.
5.1	Algalita Marine Research and Education (Katie Allen)	As the Board transitions from the Conditional Waiver to General Waste Discharge Requirements, there is a meaningful opportunity to ensure that the policy reflects both lived conditions and longterm public trust.	Comment noted.
5.2	Algalita Marine Research and Education (Katie Allen)	A durable and effective framework ... Clearly communicates responsibilities and expectations in ways that are practical for agencies and understandable to the public.	The trash TMDLs addressed by the proposed Trash WDRs specify responsible agencies and trash reduction actions. These are also spelled out in the proposed Order.
5.3	Algalita Marine Research and Education (Katie Allen)	A durable and effective framework ... Supports transparent data sharing, so progress can be seen, tracked, and discussed openly.	The Proposed Trash WDRs (Section IX) include provisions to increase the ability to share data, such as the submission of annual NSTARP report summaries in an accessible format that will be posted on the Los Angeles Water Board website, and the submission of data collected as part of Protocols for Assessment and Collection (PAC)/BMP programs in a California Environmental Data Exchange Network (CEDEN) compatible format.
5.4	Algalita Marine Research and Education (Katie Allen)	A durable and effective framework...Sets targets that reflect what is being observed in the water and on the shoreline, especially	The numeric targets and allocations for all trash TMDLs is zero trash and is based on the protection of beneficial uses of the waterbodies, not trash observation.

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		in areas that currently meet technical compliance but still experience visible trash accumulation.	
5.5	Algalita Marine Research and Education (Katie Allen)	A durable and effective framework ... Ensures that implementation strategies are well-matched to the scale and complexity of the issue, so the work being done has the best chance of making a lasting difference.	Comment noted.
5.6	Algalita Marine Research and Education (Katie Allen)	We also know that policy evolves over time, and the Board plays a critical role in guiding that evolution. Our hope is simply that the next version of this program helps bring what we see in the natural world more closely in line with what we intend through regulation.	Comment noted.
6.1	Surfrider Foundation – Long Beach (Sona Coffee)	The Regional Board notes the load allocation for nonpoint sources is “zero trash” within the Los Angeles region... None of the municipalities in this region are in compliance with the zero trash mandate as their trash ends up in the waterways that lead to Long Beach.	The trash that ends up in the waterbodies that lead to Long Beach originates from a variety of sources. The proposed Trash WDRs are limited to those waterbodies with load allocations for nonpoint sources. The commenter may be referring to attainment of the zero trash waste load allocations for point sources, which are implemented separately by the Regional Municipal Separate Storm Sewer System (MS4) Permit. Staff are committed to assessing compliance with the zero trash waste load allocations implemented by the Regional MS4 Permit and will follow up with enforcement as necessary.
6.2	Surfrider Foundation – Long Beach (Sona Coffee)	Surfrider has programs to discourage the use of single-use plastics and educates businesses on choosing ocean-friendly products. The City of Long Beach has also taken action and	Voluntary and municipal regulatory efforts are not enough to address trash impairments, which is why there have been 11 trash TMDLs adopted in the Los Angeles

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		adopted policies to limit single-use plastics that are the typical items found littering our waterways. However, these voluntary and regulatory efforts are not enough to address the behavior-change needed to stop litter from ending up in our waterways.	Region. The TMDLs in conjunction with the proposed Trash WDRs and other concurrent permitting efforts (for example the Regional MS4 permit) and grants for nonpoint source pollution implementation are active tools to address the trash impairments.
6.3	Surfrider Foundation – Long Beach (Sona Coffee)	Municipalities across the region have invested in catch-basins and trash containers to prevent litter from entering our waterways, but compliance with load allocations is the responsibility of the regulated municipalities subject to the TMDL, and enforcement is up to the Regional Board... confusion with the requirements is not an acceptable reason for non-compliance with regulatory goals that have been in place for over two decades.	<p>Catch basins are installed to address point sources, which are regulated under the Regional MS4 permit. Compliance with the MS4 permit is outside the scope of the current action</p> <p>While the earliest trash TMDLs were adopted in the early 2000s, TMDLs are not self-implementing and additional regulatory tools (like a conditional waiver or waste discharge requirements) must be adopted to make TMDL provisions enforceable. The adoption of the 2020 conditional Trash Waiver marked the first time an enforceable regulatory mechanism was established for the load allocations in the trash TMDLs. The adoption of the Trash Waiver included a process for developing and adopting monitoring and assessment plans and acknowledgement of the fact it would take time before data from the waiver were available. No enforcement has yet been completed as there is not yet enough data available to determine how conditions have changed in response to Trash Waiver.</p>
6.4	Surfrider Foundation – Long	The recommendations for the proposed Waste Discharge Requirements focus on clarifying areas of confusion, but do	The proposed Trash WDRs include provisions to clarify regulatory requirements that previously

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	Beach (Sona Coffee)	not address renewed efforts for actual compliance, or adequately characterize the impacts that non-compliance has for downstream communities.	<p>resulted in confusion for some Responsible Entities, but the majority of the document is dedicated to the specific compliance requirements for each TMDL.</p> <p>The recommended changes reflected in the proposed Trash WDRs aim to improve compliance by Responsible Entities and support possible future enforcement efforts.</p> <p>The characterization of impacts of non-compliance on downstream communities is outside the scope of the proposed Trash WDRs. However, the impacts of trash pollution are characterized in Section 6 of the staff report as are the benefit considerations of the proposed trash WDRs.</p>
6.5	Surfrider Foundation – Long Beach (Sona Coffee)	The draft notes that this Tentative Order is substantially similar to the 2020 Conditional Waiver. Continuing the program, with only minor changes in nomenclature for some program components and reporting requirements, is not the visionary action this moment calls for.	Comment noted.
6.6	Surfrider Foundation – Long Beach (Sona Coffee)	In addition to the action planning and implementation reporting, we suggest that the Regional Board set specific action areas that each municipality can clearly respond to and illustrate their plans to have a broad-based approach to addressing this pollution problem.	For those municipalities that are characterized as “Responsible Entities” in the proposed Trash WDRs, specific geographical areas are set (in the trash TMDLs that first designated Responsible Entities) and the Responsible Entities are required to submit a monitoring and assessment plan.

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			<p>The trash TMDLs state the actions Responsible Entities must follow to address the trash impairments. These are incorporated into the proposed Trash WDRs in Section X-Specific Provisions. In general, Responsible Entities are required to conduct regular collection and disposal of trash from the areas specified in the TMDLs as nonpoint sources. The Responsible Entities are also required to track trash the amounts of trash collected over time and implement additional BMPs if the amount or trash that accumulates between collection events is not decreasing. This iterative approach is based on the California Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program.</p>
6.7	Surfrider Foundation – Long Beach (Sona Coffee)	Since the policies of the Trash Waiver have not solved the issue of trash in our waterways we feel that is time for a different approach.	Comment noted.
7.1	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	Allow for Existing TMRPs to be Used to Meet the Requirements of the Order...The Responsible Parties are concerned that the Draft WDR does not adequately document the implementation history of the Trash TMDLs or the evolution of the TMRPs based on lessons learned. Additionally, it requires the development of another planning document, which may be unnecessary. Unlike the Conditional Waiver, the Draft WDR does not allow for the continued use of an existing TMRP if it meets the requirements of the Draft WDR.	<p>The staff report for the proposed WDRs documents the implementation history of trash TMDLs. Additional information on the development and evolution of the TMRPs can be found in the staff reports for the individual TMDLs subject to the proposed Trash WDRs.</p> <p>The proposed Trash WDRs included the requirement for the submission of a new monitoring and reporting plan (NSTARP). The expectation was that this plan</p>

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			<p>would rollover most of the contents included in the previously approved TMRP and therefore this effort should require minimal resources. As noted in the comment, the only major changes expected in the plans were an update of language and the inclusion of new minor reporting requirements (CEDEN submissions, ADA accessibility), which have been reduced in response to comments.</p> <p>The requirement for a new plan submittal was driven by the value that would be derived across the program by making sure submittals were cleaner (due to submitting a single updated document rather than plans cobbled together by gathering previous plans and reaffirming requests). The requirement of a new plan would also help ensure Responsible Entities are working off the correct version of the plan, as some of the existing plans are more than a decade old and Responsible Entities have had staff turnover. As with any monitoring program, exiting plans should be periodically reviewed and updated as needed and this requirement would have provided a built-in opportunity for that review.</p> <p>However, multiple commentors made similar requests for the proposed Trash WDRs to be revised to mirror the monitoring and assessment plan requirements of the Trash Waiver. Specifically, multiple commentors requested the provisions of the proposed WDRs be revised to allow Responsible Entities with a monitoring and</p>
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			<p>assessment plan previously approved by the Los Angeles Water Board to be able to reaffirm that existing plan (TMRP) as equivalent to the plan required under the WDRs (NSTARP).</p> <p>The submittal of a new plan, based on previously approved plans and including the new requirements of the proposed WDRs would be preferable to Responsible Entities reaffirming existing plans. However, all commentors asking for the reaffirmation option actively conducted monitoring and assessment events throughout the Trash Waiver and have been working to reduce trash impairments in local waters. In recognition of the possible cost burden a new plan might add and in acknowledgement of the commentors collaboration on the issue of trash impairments, the proposed Trash WDRs have been updated to allow for existing TMRPs for nonpoint sources to be reaffirmed as equivalent to the NSTARPs required by the WDRs.</p> <p>To reaffirm an existing and approved plan, Responsible Entities must submit a letter attesting to the reaffirmation and requesting that the existing plan be allowed stand as an equivalent document. The letter must also affirm the Responsible Entities will utilize the terms NSTARP, PAC and PAC/BMP in all future trash annual reports and correspondence required for compliance with the proposed Trash WDRs and add the additional requirements of the proposed Trash WDRs (reporting</p>
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			<p>deadlines, document accessibility requirements and electronic data submission requirements). Responsible Entities that chose to reaffirm an existing and approved plan must also attach a copy of the existing monitoring and reporting plan and approval documents related to that plan.</p> <p>This revision of requirements of the proposed Trash WDRs has been made universally throughout the document.</p>
7.2	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	The findings of the Draft WDR note that there are no changes to the requirements of these components from the Conditional Waiver. However, the Draft WDR requires that the NSTARP be submitted within three months of the Draft WDR becoming effective... Since the existing TMRP was developed to comply with the Conditional Waiver, which included the same requirements, the cost and time needed to prepare a new plan that does not contain changes to the approach seems unwarranted.	See response to comment 7.1
7.3	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	<i>In Special Provision X.10.b, please include a footnote next to the word "initial" that states: "Initial is defined as the frequency and locations applicable on the effective date of the Malibu Creek Trash TMDL."</i>	<p>The proposed footnote is not necessary. The language in Special Provision X.10.b comes from the language that is in the revised Malibu Creek Watershed Trash TMDL, which was effective May 6, 2020, and is the same language that was included in the Trash Waiver.</p> <p>While the "initial" frequency and locations of monitoring are specified in the WDRs as the original starting point, the PAC/BMP approach is intended to be iterative and respond to changes in the presence of trash at</p>

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			<p>the sites specified in the trash TMDLs.</p> <p>For Regulated Entities that have been implementing the TMDL for a long time, they may have already gone through this iterative process and may no longer be at the “initial” phase of implementation. These Regulated Entities may choose to reaffirm their existing approved monitoring and assessment plan. The affirmation letter can confirm the frequency and location of monitoring will be the same as was included in that plan.</p> <p>No change made.</p>
7.4	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	<i>Add a finding to the Draft WDR that states: “The County of Ventura, Ventura County Watershed Protection District and the City of Thousand Oaks are implementing a TMRP and MFAC/BMP program approved under the Conditional Waiver to comply with the Malibu Creek and Santa Monica Debris TMDLs. The approved TMRP and MFAC/BMP program are equivalent to the NSTARP, PAC and PAC BMP programs required by the Draft WDR for nonpoint sources.”</i>	See response to comment 7.1.
7.5	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	<i>Consistent with the Responsible Parties’ compliance history, modify Background finding II.19 to allow responsible entities with approved TMRPs under the Conditional Waiver to continue to implement those programs without submitting a new plan. Similar language was included in the Conditional Waiver to allow continued implementation of TMRPs that met the Conditional Waiver requirements. Suggested language is as follows:</i>	See response to comment 7.1.

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		<i><u>“All responsible entities will be required to submit a NSTARP within 3 months of the effective date of this order <u>or affirm the intent to continue to implement an approved TMRP. Responsible entities that have existing TMRPs that were approved to comply with the Conditional Waiver may continue implementation of that TMRP provided it satisfies the conditions of this WDR. Entities choosing to continue using an existing TMRP shall use the updated terminology in this WDR in future annual reports and when referring to the approved TMRP.”</u></u></i>	
7.6	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	<i>Modify Specific Provision X.10.f to only require the submittal of an NSTARP if the Responsible Parties do not have an equivalent approved TMRP under the Conditional Waiver. The language can require all future AMRs to use the new terminology in the Draft WDR for the nonpoint source elements of the TMRP if desired. Suggested language is as follows: a. “Responsible entities for the Malibu Creek Watershed Trash TMDL shall submit a NSTARP <u>or shall affirm via letter to the Los Angeles Water Board that a TMRP approved by the Executive Officer to comply with Order R4-2020-0112 will continue to be implemented within three months of the effective date of this Order. The letter shall affirm that the responsible entities will utilize the terms NSTARP, PAC and PAC/BMP in all future annual reports and correspondence referring to the nonpoint source elements of TMRP that will continue to be implemented.”</u></i>	See response to comment 7.1.
7.7	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek	Implementation of the Malibu Creek Watershed Trash TMDL plan satisfies the requirements of the Santa Monica Bay Nearshore and Offshore Debris	The exemption approved by the Los Angeles Water Board on August 30, 2013, was for the requirement of a plastic pellet

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	Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	<p>TMDL for entities located in Ventura County. A request for an exemption was submitted by the County of Ventura and was approved by the LA-RWQCB on August 30, 2013. The Regional Stormwater Permit, Attachment E, Table E-2 reflects the approved exemption¹ and similar language should be included in the Draft WDR.</p> <p><i>Add the County of Ventura to footnote 4 in Special Provision 11.a.1) to state that they are not required to implement the requirements of this section, like the State Lands Commission. Alternatively, include a footnote in Special Provision 11.a.1), that states that "Submissions for the Malibu Creek Trash TMDL satisfy the requirements of this section for the County of Ventura."</i></p>	<p>monitoring and reporting plan, not a complete exemption from Santa Monica Bay Debris TMDL.</p> <p>The proposed Trash WDRs carry over most of the general and special provisions of the 2020 Trash Waiver. This issue was raised in a letter from the County of Ventura during the public comment period for the 2020 Trash Waiver. As stated in the response to comments for the 2020 Trash Waiver, "The Los Angeles Water Board disagrees that the County of Ventura has no jurisdiction over nonbeach open space or parks within the bounds of the Santa Monica Bay Debris TMDL. The County of Ventura has a small area under their jurisdiction within the bounds of the Santa Monica Bay Debris TMDL in the far south-eastern portion of the county" and no change was made in response to the comment.</p>
7.8	Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)	<p>In researching the capabilities referenced in the Staff Report, the methodology for submitting trash data to CEDEN is unclear. While permittees are willing to provide trash assessment data to CEDEN, it is unclear how to use the habitat function of CEDEN to document trash monitoring and collection areas. This process does not appear to have a protocol or guidance to delineate monitoring areas and has largely only been used to designate habitat areas. Additionally, it is unclear if visual assessment data can be easily provided to CEDEN in a compatible format. Identifying methods for submitting trash monitoring areas will substantially increase reporting costs,</p>	<p>The requirement to submit data to CEDEN has been removed from the proposed Trash WDRs. Instead, Responsible Entities will need to submit with their annual monitoring reports an electronic version (excel or other software) of any quantitative data collected (including but not limited to date and location of sampling and pounds or volume of trash) in CEDEN compatible format. Responsible Entities have already been collecting and submitting this data in narrative form in annual monitoring reports (usually in pdf format), so the additional requirement should necessitate minimal additional resources.</p>

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		<p>and the lack of clear guidance poses a risk of noncompliance...</p> <p><i>1. The Responsible Parties request removal of the CEDEN requirements until guidance or protocols are developed and tested.</i></p> <p><i>2. If the requirement is maintained, please include the substantial reporting cost increases for including CEDEN requirements in the cost analysis in the Draft WDR Staff Report, and include guidance documents or protocols for submitting the data to CEDEN.</i></p>	
7.9	<p>Malibu Creek Watershed Trash TMDL, Upper Malibu Creek Watershed Group of County of Ventura, Ventura County Watershed Protection District and City of Thousand Oaks (Hayley Luna)</p>	<p>The Trash TMDL annual reports rely heavily on photographic evidence to demonstrate site conditions, such as images of individual trash items measured against a ruler on a dark background. While alternative text descriptions are important for accessibility, providing detailed alternative text for each photograph in these contexts may significantly increase reporting costs without proportionally enhancing public understanding or access. We encourage the LA-RWQCB to adopt a reporting framework that supports accessibility in a meaningful and cost-effective manner, particularly for documentation types where alternative text may provide limited additional value to the public.</p> <p><i>We request the LA-RWQCB evaluate the reporting accessibility requirements in the Draft WDR to balance the requirements with the resources needed to meet the requirements and the information types necessary for Trash TMDL reporting. We request consideration of the practicality of creating alternative text for photographs that are illustrating the narrative and field logs. One option could be to require the main report to be compliant</i></p>	<p>The Proposed Trash WDRs accessibility requirements have been updated (Section IX.6). Each annual monitoring report (AMR) will be required to include an ADA accessible summary report synopsis that includes the major results of the AMR and a data table. Photographic evidence required by the AMR does not need to be in ADA accessible format.</p> <p>Section 8 of the staff report. was updated to reflect this change.</p>

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		<p><i>but not have the requirement for appendices and attachments that include field logs and photographs.</i></p> <p><i>Include the substantial cost for developing compliant reports in the cost analysis in the Draft WDR Staff Report.</i></p>	
8.1	<p>City of Long Beach (Councilmember Christina Duggan, Vice Mayor Roberto Uranga, Councilwoman Tunua Thrash-Ntuk)</p>	<p>Between 2020 and 2024, Long Beach collected more than 25 million pounds of trash and debris carried downstream from the Los Angeles River, costing the city over \$12 million from its Tidelands Fund. Despite decades of a zero-trash standard, this debris continues to reach our coastline, degrading water quality, limiting recreation, and placing unsustainable financial and operational burdens on local taxpayers. As encampments and human activity increase along our waterways, nonpoint-source pollution has become a growing challenge. The regulations must evolve to address these realities and advance the region toward its zero-trash target.</p>	<p>Comment noted.</p> <p>Trash impairments remain a major issue for waterbodies throughout the Los Angeles region. Trash sources are addressed through multiple permits in the region. Upstream contributions of trash are currently being addressed through the Regional MS4 Permit. The Los Angeles River Trash TMDL found that the MS4 system is the major source of trash in the watershed.</p> <p>The proposed Trash WDRs are limited to the specific nonpoint sources of trash identified in the 11 trash TMDLs of the Los Angeles region. These TMDLs included specific areas to be addressed for nonpoint sources of trash, including specific areas along the Los Angeles River. An appendix has been added to the proposed Trash WDRs listing the specific areas in the Los Angeles River watershed subject to this order.</p> <p>For nonpoint sources identified in the trash TMDLs, the proposed Trash WDRs include provisions for Responsible Entities to adapt to changes in trash loads so the zero-trash allocation can be met. If increases in trash between collection events are identified, Section X of the proposed trash</p>

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			<p>WDRs require additional BMPs to address the increases.</p> <p>The nomenclature changes included in the proposed Trash WDRs will allow for more refined analysis of trash data and will aid in the current effort to address the point sources of trash regulated under the MS4 permit by making the separate requirements clear.</p>
8.2	City of Long Beach (Councilmember Christina Duggan, Vice Mayor Roberto Uranga, Councilwoman Tunua Thrash-Ntuk)	I write in support of the Los Angeles Regional Water Quality Control Board's proposal to adopt General Waste Discharge Requirements (WDRs) for trash from nonpoint sources, with the recommendations offered by the City of Long Beach.	Comment noted.
8.3	City of Long Beach (Councilmember Christina Duggan, Vice Mayor Roberto Uranga, Councilwoman Tunua Thrash-Ntuk)	The proposed WDRs will improve accountability and data transparency. Mandatory participation will strengthen the region's collective response to trash pollution, and public data reporting through CEDEN will allow residents and stakeholders to compare official reports to everyday realities along our waterways. By modernizing how progress is tracked and shared, the Board can improve transparency as we work toward our shared goal of clean and safe waterways.	Comment noted.
8.4	City of Long Beach (Councilmember Christina Duggan, Vice Mayor Roberto Uranga, Councilwoman Tunua Thrash-Ntuk)	I also urge the Board to take a more proactive approach to achieving the zero-trash target in the Los Angeles River, which includes ensuring compliance and exploring technologies and standardized methods to measure actual trash in the environment rather than relying solely on procedural compliance. Despite millions of pounds of debris continuing to flow down the river each year, there has been no	The conditional Trash Waiver was adopted in late 2020 and trash monitoring was not required immediately. As such, there is less than 4 years of data available to evaluate the success of the Waiver. With the adoption of the proposed Trash WDRs, trash monitoring and assessment will continue, and the data collected under the WDRs, in combination with the limited data

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		<p>enforcement action taken for violations. Meaningful progress depends on measuring real outcomes.</p>	<p>collected under the Trash Waiver, will be used for determining compliance and possible enforcement. See response to comment 4.1, 6.1, and 6.3 for further discussion of the trash in the river and zero-trash target.</p> <p>The proposed Trash WDRs include 11 different trash TMDLs, which were adopted individually and cover a number of different waterbodies and conditions. As such, there is some variability in requirements but as much as possible, the proposed Trash WDRs require a standard method of developing a plan that includes collection and assessment of trash in the areas specified in the TMDLs, implementation of additional BMPs as necessary and standardized language, reporting and accessibility.</p>
8.5	<p>City of Long Beach (Councilmember Christina Duggan, Vice Mayor Roberto Uranga, Councilwoman Tunua Thrash-Ntuk)</p>	<p>Trash is not only an environmental concern but a visual pollutant that discourages public use of our coastline, harms marine life, and erodes confidence in our shared stewardship of local waterways. Stronger oversight and shared accountability across jurisdictions will help restore the health of the Los Angeles River, revitalize our coastal economy, and protect downstream communities like Long Beach.</p>	<p>Comment noted.</p>
9.1	<p>Long Beach Department of Public Works (Colin Averill, PE)</p>	<p>The steps to further eliminate trash in the Los Angeles River extend beyond the scope of the WDR and the City will continue to engage in review of proposed requirements in the future along with our watershed partners.</p>	<p>Comment noted.</p>

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9.2	Long Beach Department of Public Works (Colin Averill, PE)	<p>Trash collection, monitoring, reporting, and Best Management Practice (BMP) implementation in open spaces and parks within responsible entities jurisdiction cannot address nonpoint sources of trash that originate from rights of way or private property outside of responsible entities jurisdiction. Nonpoint source trash requirements for rights of way and private property outside of named responsible entities jurisdiction and adjacent to the Los Angeles River should be included in the WDR or should be referenced in the WDR if existing, applicable regulations exist. The WDR should clearly specify that, within a waterbody, only sources discharged from a responsible entity's jurisdiction will count toward its load allocation. For example, trash generated by individuals in a channel not owned or managed by the responsible entity should not be counted toward the responsible entity's load allocation during a PAC assessment.</p>	<p>The proposed Trash WDRs incorporate the load allocations for the 11 trash TMDLs adopted for the Los Angeles region and apply to the Responsible Entities identified in those TMDLs. Discussion of trash requirements for rights of way and private properties not named in the TMDLs are outside the scope of the proposed Trash WDRs but can be addressed through other regulatory mechanisms.</p> <p>The trash TMDLs and the Proposed WDRs specify the area and Responsible Entities subject to the order. An appendix has been added to the order, listing the specific areas within the Los Angeles River watershed covered by the WDRs.</p> <p>However, trash (or any other pollutant) that is identified within the boundaries of a Responsible Entity's jurisdiction is the responsibility of that entity regardless of where it originated.</p>
9.3	Long Beach Department of Public Works (Colin Averill, PE)	<p>Part X.16.c.2 of the WDR...it is suggested that the provision be revised to state, "The trash amount accumulated between PAC events shall not exceed the load allocations of 640 gallons per square mile per year (gal/mi²/yr) nor show an increasing trend. Trash originating outside a responsible entity's jurisdiction is excluded from their load allocation."</p>	<p>See response to comment 9.2.</p>
9.4	Long Beach Department of Public Works (Colin Averill, PE)	<p>Requirements should be included for the channel authority having jurisdiction to address the nonpoint source of people experiencing homelessness and require cleanup of encampments.</p> <p>The WDR does not address a root cause of chronic sources of trash from</p>	<p>The Trash TMDLs are intended to identify the amount of trash a waterbody can receive and still meet water quality standards. As part of this process, the sources of impairment are identified and include both point sources and nonpoint sources. In turn, the</p>

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	<p>encampments and people experiencing homelessness within channel rights of way that are outside of City jurisdiction. These sources are a substantial and persistent pathway for trash loading directly into receiving waters and outside of City control.</p> <p>The WDR states that permittees collect and assess all trash found in the water and other areas subject to the Los Angeles River Trash Total Maximum Daily Load (TMDL), including shorelines, channels, and/or source areas of the waterbodies. Minimum Frequency of Assessment and Collection (MFAC) monitoring sites (now Protocols for Assessment and Collection (PAC)) are an effective tool to monitor and collect trash from open space and parks managed by the City as a responsible jurisdiction; however, cleanup of adjacent channels that are outside of City jurisdiction pose several challenges. Encampment trash and interactions with people experiencing homelessness present health and safety concerns that require specialized staff and resources that extend beyond typical City operations and maintenance for parks and open space. Additionally, legal noticing and other protocols required prior to clean up of encampments must be done by the channel authority having jurisdiction.</p> <p>Regardless of cleanup efforts and as long as this source remains unaddressed, trash will continue to enter the receiving water. Additionally, water quality impairments from this source extend beyond the scope of this WDR, including bacteria from lack of sanitary facilities within a channel not intended for inhabitation.</p>	<p>proposed Trash WDRs are intended to serve as one of the regulatory tools by which the TMDLs (the load) are reached, specifically to address the nonpoint sources previously identified in the TMDLs.</p> <p>The Los Angeles Water Board recognizes the complex issue of trash accumulation due to concentrated human activity. However, the trash TMDLs covered by the proposed Trash WDRs have been adopted and are in effect. Therefore, regardless of the complexity of the issue of encampments, compliance with the Trash WDRs is required to meet the TMDLs.</p> <p>The proposed WDRs allow for flexibility in BMPs implemented, and Responsible Entities are encouraged to pursue new approaches to address the continued trash issues.</p> <p>The Los Angeles Water Board have worked with Responsible Entities to find additional solutions and resources, such as 319(h) grant funds. For example, there may be 319h grant funds available to support nonpoint source trash TMDL compliance.</p>
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9.5	Long Beach Department of Public Works (Colin Averill, PE)	<p>Additional information about the Annual Tracking Report to be posted by Los Angeles Water Board Staff should be included in the WDR.</p> <p>The staff report <i>Review of Conditional Waiver Order No. R4-2020-0112 and Recommendations for Waste Discharge Requirements</i> states “Los Angeles Water Board staff will post an annual tracking report of the submittals and general analyses of trash reduction efforts.” The WDR does not include mention of the report. This information should be included with details of the analyses in the report, increases in frequency of collection or additional BMPs implemented, statements of non-compliance, and compliance actions.</p>	<p>The report mentioned in the staff report is a Los Angeles Water Board staff task and outside the scope of the proposed Trash WDRs, which contain regulatory requirements for Regulated Entities subject to the Trash TMDLs.</p> <p>The report was mentioned in the staff report to provide greater contextual information on the larger TMDL Trash efforts.</p>
9.6	Long Beach Department of Public Works (Colin Averill, PE)	To ensure consistent and accessible reporting, the WDR should include explicit formatting guidelines for CEDEN data submissions and ADA-compliant report preparation for online publication. Without clear and consistent standards, the significant effort invested by responsible entities in data collection and reporting may fall short of its intended impact—resulting in submissions that are difficult to interpret, inaccessible to the public, or not usable by the Regional Water Board.	See response to comment 7.9.
9.7	Long Beach Department of Public Works (Colin Averill, PE)	<p>For the LAR Watershed Trash TMDL the WDR should clarify that the implementation of BMPs by responsible entities must be limited to the geographic boundaries of their legal jurisdiction. This alignment ensures: legal accountability, efficient resource allocation, and avoidance of jurisdictional conflicts.</p> <p>This comment would apply to Part X.16.d.4 of the WDR, and it is suggested the provision be revised to state: “An initial suite of BMPs to be</p>	<p>The proposed Trash WDRs are designed to ensure compliance with the trash TMDLs, which include the implementation of BMPs to achieve zero trash load allocations.</p> <p>The Trash TMDLs specify the areas subject to the nonpoint source load allocations. An appendix has been added to the order listing the specific areas in the Los Angeles River watershed</p>

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		implemented between PAC events based on current trash management practices in land areas under the responsible entity's legal authority that are found to be nonpoint sources of trash to the Los Angeles River and its tributaries."	<p>subject to the load allocations and the WDRs.</p> <p>The WDRs specify that responsible entities are required to implement BMPs within their respective jurisdictions to address nonpoint source trash pollution. The WDRs do not impose requirements for responsible entities to implement BMPs outside their jurisdiction.</p>
9.8	Long Beach Department of Public Works (Colin Averill, PE)	Under the Los Angeles River (LAR) Watershed Trash TMDL section, Part X.16.c.2 of the WDR specifies a load allocation of 640 gallons per square mile per year, which is a volume-based metric. However, other trash TMDLs allow responsible entities the flexibility of choosing a metric (e.g., weight, volume, pieces of trash) to measure the amount of trash collected during each PAC event. We request the same flexibility be given to responsible entities under the LAR Watershed Trash TMDL. An alternative approach would be providing a numeric conversion from weight to volume consistent with other TMDL waterbodies included in the WDR.	<p>The proposed WDRs specify a load allocation of zero trash for nonpoint sources under the Los Angeles River Watershed Trash TMDL and all other Trash TMDLs in the Los Angeles region.</p> <p>The 640 gallons per square mile per year was included in the 2015 Los Angeles River Trash TMDL as a baseline load allocation with the final load allocation of zero trash. The 640 gallons per square mile per year is included in the proposed Trash WDRs as a compliance metric. The Lower Los Angeles River Management Group may propose a numeric conversion from weight to volume in the NSTARP.</p>
10.1	LA Sanitation and Environment - Watershed Protection Division (Taraneh D. Nik-Khah)	LASAN understands and supports the Los Angeles Water Board's need to clarify and differentiate the nomenclature for nonpoint source program implementation components but developing a new NSTARP document that does not require changes to the existing TMRPs and MFAC/BMP programs is unnecessary and creates an administrative burden for both responsible entities and Los Angeles Water Board staff. LASAN requests that	See response to comment 7.1.

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		<p>language be added to the Draft WDR that allows responsible entities to affirm that their existing TMRPs and MFAC/BMP programs are sufficient to meet the requirements of the WDR.</p> <p>Revise the following sections to allow responsible entities to continue implementation of existing TMRP and MFAC/BMP programs without submitting new plans:</p> <p>Section X.11.c.: <i>Responsible entities for the Santa Monica Bay Nearshore and Offshore Debris TMDL shall submit a NSTARP for Executive Officer approval within three months of the effective date of this order. Alternatively, responsible entities shall submit a letter to the Executive Officer within three months of the effective date of this order affirming that the current TMRP or MFAC/BMP program is sufficient to meet the requirements of this Order and that the definitions for NSTARP, PAC, and PAC/BMP identified in the Order will be utilized in future reports.</i></p> <p>Section X.12.f.: <i>The City of Los Angeles shall submit a NSTARP within three months of the effective date this Order. Alternatively, the City of Los Angeles shall submit a letter to the Executive Officer within three months of the effective date of this Order affirming that the current TMRP or MFAC/BMP program is sufficient to meet the requirements of this Order and that the definitions for NSTARP, PAC, and PAC/BMP identified in the Order will be utilized in future reports.</i></p> <p>Section X.16.d.: <i>Responsible entities for the Los Angeles River Trash TMDL shall submit a NSTARP for Executive Officer approval within three months of the</i></p>	
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		<p><i>effective date of this Order. Alternatively, responsible entities shall submit a letter to the Executive Officer within three months of the effective date of this Order affirming that the current TMRP or MFAC/BMP program is sufficient to meet the requirements of this Order and that the definitions for NSTARP, PAC, and PAC/BMP identified in the Order will be utilized in future reports.</i></p> <p><i>Section X.18.j.: Responsible source entities for the Peck Road Park Lake, Lincoln Park Lake, and Echo Park Lake TMDLs shall submit a NSTARP for Executive Officer approval within three months of the effective date of this Order. Alternatively, responsible entities shall submit a letter to the Executive Officer within three months of the effective date of this Order affirming that the current TMRP or MFAC/BMP program is sufficient to meet the requirements of this Order and that the definitions for NSTARP, PAC, and PAC/BMP identified in the Order will be utilized in future reports.</i></p>	
10.2	LA Sanitation and Environment - Watershed Protection Division (Taraneh D. Nik-Khah)	<p>The December 15th deadline in the Conditional Waiver allowed LASAN the opportunity to develop all trash annual reports efficiently during the same period of time, including the requirements under the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2012-0175-A01). Because LASAN is responsible for annual reporting requirements for five trash TMDLs, significant efforts were undertaken to internally establish and streamline the reporting process. LASAN requests that reporting deadlines be revised to the</p>	<p>To minimize disruptions to the trash data reporting schedules and in recognition of reporting program alignment and synergies, the proposed Trash WDRs have been updated to reflect a reporting period of July 1 to June 30 of the following year, with annual reports due December 15, following the reporting period.</p> <p>The General Provisions have been updated to the following:</p> <p>“IX.4. Unless otherwise requested in the NSTARP (and subject to Executive Officer review and approval), the first annual NSTARP</p>

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		<p>December 15th submittal date that was previously required in the Conditional Waiver and that the reporting period be defined from July 1st through June 30th.</p> <p>Revise the following sections as shown:</p> <p>Section X.11.d.: <i>Responsible entities for the Santa Monica Bay Nearshore and Offshore Debris TMDL shall submit annual NSTARP reports on or before June 30 December 15.</i></p> <p>Section X.12.g.: <i>The City of Los Angeles shall submit annual NSTARP reports on or before June 30 December 15.</i></p> <p>Section X.16.e.: <i>Responsible entities for Los Angeles River Trash TMDL shall submit annual NSTARP reports on or before June 30 December 15.</i></p> <p>Section X.18.k.: <i>Responsible entities for the Peck Road Park Lake, Lincoln Park Lake, and Echo Park Lake TMDLs shall submit annual NSTARP reports on or before June 30 December 15.</i></p>	<p>reports shall be due June 30, 2026 and include the previously unreported data collected under the Trash Conditional Waiver through September 10, 2025. The collection of this data was required by Order R4-2020-0112.”</p> <p>and</p> <p>“IX.5 All subsequent annual NSTARP reports shall report data for the period covering July 1st to June 30th of each calendar year and shall be submitted by December 15th the same calendar year. An alternative reporting period and reporting date may be requested in the NSTARP and is subject to review and approval.”</p> <p>The Specific Provisions for all TMDLs have also been updated to be consistent with the above changes.</p>
10.3	LA Sanitation and Environment - Watershed Protection Division (Taraneh D. Nik-Khah)	<p>While LASAN has experience submitting water quality data to CEDEN, the process for submitting trash assessment data, especially geospatial polygon data and the differing types of data collected for trash (e.g., pictures and visual observations), to CEDEN is not defined. Additionally, based on LASAN's experience, CEDEN uploads even for water quality data have required substantial processing and verification from CEDEN staff. As this type of CEDEN submittal differs from the submittal of water quality data, LASAN</p>	<p>See response to comment 7.8.</p>

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		<p>requests that the CEDEN submittal requirements be deferred until clear protocols for submitting trash assessment data to CEDEN have been developed. LASAN requests that the Los Angeles Water Board convene a work group that includes representatives from the CEDEN to collaboratively develop the protocols.</p> <p>Requested Action:</p> <ul style="list-style-type: none"> • Revise Section IX.7. as follows: <i>In addition to the annual submittal of annual NSTARP reports, all responsible entities shall also submit data collected as part of PAC/BMP programs to CEDEN and the Los Angeles Water Board once a CEDEN Workgroup has established protocols for submitting trash data to CEDEN.</i> 	
10.4	LA Sanitation and Environment - Watershed Protection Division (Taraneh D. Nik-Khah)	<p>LASAN strongly supports informing the public of environmental information through the availability of reports and documents online, a goal that is supported through meeting accessibility guidelines. However, the type of trash-related information that will be reported in annual NSTARP reports presents challenges and limitations in meeting accessibility guidelines. For example, current annual reports contain a significant number of pictures documenting trash conditions that would require the development of alternative text per photograph to meet accessibility requirements. Annual reports also contain field observation forms, often handwritten and scanned, which would be challenging to convert to a format that meets accessibility guidelines.</p> <p>LASAN requests that the Draft WDR language is revised to only require the</p>	See response to comment 7.9.

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		main body of annual NSTARP reports to satisfy World Wide Web Consortium (W3C), Web Content Accessibility Guidelines 2.2, while allowing for attachments and appendices to be compliant with the guidelines only when a request is made from the public for those specific documents.	
11.1	Lower Los Angeles River Watershed Management Group (Gladis Deras, Chair)	Under the Los Angeles River (LAR) Watershed Trash TMDL section, Part X.16.c.2 of the proposed WDR specifies a Load allocation of 640 gallons per square mile per year, which is a volume-based metric. However, other trash TMDLs allow responsible entities the flexibility of choosing a metric (e.g., weight, volume, pieces of trash) to measure the amount of trash collected during each PAC event. We request that the same flexibility be given to responsible entities under the LAR Watershed Trash TMDL. An alternative approach would be providing a numeric conversion from weight to volume consistent with other TMDL waterbodies included in the proposed WDR.	See response to comment 9.8.
11.2	Lower Los Angeles River Watershed Management Group (Gladis Deras, Chair)	To ensure consistent and accessible reporting, we request that the proposed WDR include explicit formatting guidelines for CEDEN data submissions and ADA-compliant report preparation for online publication. Without clear and consistent standards, the significant effort invested by responsible entities in data collection and reporting may fall short of its intended impact-resulting in submissions that are difficult to interpret, inaccessible to the public, or not usable by the Regional Board.	See response to comment 7.9.
12.1	CWE (Gerald Greene, DEnv, PE)	The LARWQCB and staff have shifted implementation of this initiative from Municipal Separate Storm Sewer System (MS4) National Pollutant	Implementation of trash TMDLs has not shifted from NPDES (point source) permits to nonpoint source permits (Trash Waiver and WDRs).

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		<p>Discharge Elimination System (NPDES) Permits, to the September 2020 Order 2020-0112 Conditional Waiver of WDRs, and now proposes to adopt General WDRs, without collaborating with the Responsible Entities to implement the program by providing required Plan approvals and report comments. This has left both Board and Responsible Entity staff with unclear implementation and reporting expectations.</p>	<p>Both types of permits are part of the regional approach to address trash impairments and are necessary to address trash impairments in local waters.</p> <p>Implementation and reporting expectations regarding nonpoint sources of trash impairments were clearly laid out in the trash TMDLs, the Trash Waiver and the Proposed Trash WDRs. The requirements included in the proposed Trash WDRs are largely similar to those in the conditional Trash Waiver. However, the public comments and response steps integrated in the proposed Trash WDRs adoption process provides an opportunity to discuss the WDRs requirements and request additional clarity for those Responsible Entities that wish to do so.</p>
12.2	CWE (Gerald Greene, DEnv, PE)	<p>The PAC/BMP is based on post-critical event assessments, that will likely be performed by City Park staff completely unfamiliar with the complexities of CEDEN submission, while the NSTARP might well be based on SWAMP assessment protocols that are entirely foreign to City Park staff. Regional Board staff should collaborate with Responsible Entity representatives to revise the draft WDR to reflect that cost-effective implementation strategies that allow the Responsible Entities to use staff or consultants to develop, implement, and submit the PAC/BMP and NSTARP plans and reports.</p>	<p>It is incumbent upon Responsible Entities to make sure personnel conducting the trash monitoring and assessment programs are adequately trained and capable of completing the tasks included in each Responsible Entities' NSTARP.</p> <p>The proposed Trash WDRs already provide flexibility for responsible entities to select implementation options that best suit their circumstances, including the use of staff or consultants to develop, implement, and submit PAC/BMP and NSTARP plans and reports.</p>
12.3	CWE (Gerald Greene, DEnv, PE)	<p>To the public and Responsible Entities, Regional Board staff seem enamored with changing nomenclature purely for the confusion it imposes on the</p>	<p>The introduction of new terminology, such as "Protocols for Assessment and Collection" (PAC) and "Nonpoint Source Trash</p>

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		<p>regulated communities. Agency staff must continually explain that Standard Urban Stormwater Management Program (SUSMP) Plans, became Low Impact Development (LID) Plans, and now Priority Redevelopment Program (PRP) Plans, which are best prepared using the 2014 County LID guidelines. The same, or even worse, challenges will arise in evolving from MFACs to PAC/BMP Plans, and TMRP to NSTARP Plans, without the majority of those responsible for its implementation having successfully gone through an approval and implementation process for the prior documents. We don't object to the novel nomenclature, however we do recommend a longer and more lenient initial conversion and implementation period, especially since the current proposal overlaps with the MS4P ROWD preparations period.</p>	<p>Assessment and Reporting Plan" (NSTARP), is intended to reduce confusion between point source and nonpoint source requirements. Under the Trash Waiver, similar terms (e.g., MFAC and TMRP) were used for both types of compliance, leading to misunderstandings among some responsible entities. The new terminology ensures clearer distinctions and helps entities better understand their obligations.</p> <p>The requirement has been updated. For those Responsible Entities with a monitoring and assessment plan that was approved under the Conditional Trash Waiver, an additional compliance option has been added allowing for the re-affirmation of the existing approved plan, provided it clarifies terminology and reporting requirements.</p> <p>For those Responsible Entities without an approved plan, the NSTARP submittal should be straightforward (as the proposed WDRs propose limited changes from the requirements adopted 5 years ago) and staff are available to provide guidance.</p> <p>Requiring submission of a new NSTARP (or affirmation of an existing plan previously approved under the conditional Trash Waiver) within three months ensures that all responsible entities are aligned with the updated permit requirements on a timeline that does not allow for an extended period without implementation measures in place.</p>
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12.4	CWE (Gerald Greene, DEnv, PE)	The draft order should delete the definition for “Point Source Pollution”, which references conveyances, not pollutants, or sources. The definition for “Responsible Entity” deserves a section number, since the current draft implies it is a subsection of the Point Source Pollution definition. Waste Load Allocation and Load Allocations should also be defined, since from a regulatory perspective they are very different sources and types of pollutants.	<p>This order only applies to nonpoint source pollution. The definition of point source pollution is included as there remains confusion among some Regulated Entities and the public as to what type of pollution were being addressed by the Conditional Waiver. In an effort to remove some of the confusion, the definition was included and will not be removed.</p> <p>The Proposed WDRs have been revised to provide a number for “Responsible Entity” to clarify it is a separate definition from “Point Source Pollution”.</p> <p>Definitions for “Waste Load Allocation” and “Load Allocation” have been added to the Proposed Trash WDRs.</p>
12.5	CWE (Gerald Greene, DEnv, PE)	Board staff should hold a Trash WDR CEDEN training workshop, prior to Order adoption or at least prior review, approval, and implementation of the NSTARP Plan. Current CEDEN reports have some many parameters that are duplicated that are almost impossible to use in a comprehensive way.	Same as response 7.8.
12.6	CWE (Gerald Greene, DEnv, PE)	we implore the Board to direct staff to conduct at least one workshop with representatives for the Responsible Entities to discuss what attributes of the prior CWWDR implementation and reporting did not meet you expectations and how they could be improved through your adoption of the draft WDRs	Workshops are intended to give high-level overviews of program elements and regulatory tools rather than specific plan feedback. Staff are available to meet with Responsible Entities that require plan specific feedback and guidance.

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13.1	Bluewater Task Force	As a result of our testing and our beach clean ups in the Ventura Estuary in partnership with Ventura Land Trust, we are acutely aware of the relationship between trash in the Ventura River and non source point pollution from human activity near or in the Ventura River. Bacteria counts associated with micro trash may contribute at times to the exceeding of the CA EPA standards for safe water entry further south at Surfers' Point and other southern beaches which have been delisted by the LARWQB due to structural problems.	Comment noted.
13.2	Bluewater Task Force	The problems with trash in the Ventura River in the trash TMDL is that trash sources exceed the acreage listed in the TMDL and managed by Ventura Land Trust due to the mixed use of our watershed along the Ventura River. These sources include private businesses like the Ojai Valley Golf Course, multiple unhoused people living next to or in the Ventura River bed, trash from Ojai Valley Bike Path users, and private owners of property along the Ventura River.	Comment noted.
13.3	Bluewater Task Force	After a rain event, there are hundreds of golf balls at Surfers Point from the golf course, unhoused people's trash which include very large items like couches, office furniture, refrigerators, mattresses, sleeping bags, grills, and medical waste like syringes, household trash, single use plastic debris which end up in the Ventura Estuary and if the berm at the Estuary is broken from a hard flow, in the ocean, and at Surfers Point.	<p>The Proposed Trash WDRs aim to address such issues by requiring responsible entities to implement robust trash assessment, collection, and BMPs to prevent trash from entering water bodies. These measures, combined with annual monitoring and reporting requirements, are designed to mitigate the impact of various types of trash, including large items and hazardous waste, on water quality and the surrounding environment.</p> <p>The issue of trash accumulation at Surfers Point and the Ventura Estuary, particularly after rain</p>

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			events, highlights the critical need for effective nonpoint source pollution control measures. The Proposed Trash WDRs recognize the impacts of rain events on trash accumulation and specifically require an assessment and collection event at the Front Street storm drain, which discharges under the eastern levee, 50-feet north of the railroad tracks, within one week after each storm event with one inch of rain or greater.
13.4	Bluewater Task Force	While the presence of these syringes and large trash items are one example of the difficulty of maintaining the boundaries of the current trash TMDL as it is, Blue Water Task Force is also concerned with the relationship with bacteria from microplastics from recent studies that show bacteria adheres to microplastic.(https://doi.org/10.1016/j.cofs.2021.04.016 .) Microplastics are the largest source of pollution at Ventura County beaches.	Comment noted.
13.5	Bluewater Task Force	While VLT has done an excellent job in helping the unhoused living in the Ventura River find housing, housing for those who live outdoors in Ventura is limited, State Parks - Channel Islands District #1 is understaffed and has a hard time addressing the unhoused camps along the Ventura mouth and their part of the Estuary.	Comment noted.
13.6	Bluewater Task Force	In summary, Ventura County BWTF would like to see State and Ventura County District #1, County Parks included in the trash TMDL acreage for the Ventura River Estuary since their sites along the Ventura River mouth are their jurisdictions and they do not pick up their visitors trash along the Ventura	Comment noted. The Proposed Trash WDRs incorporate the existing Los Angeles Region Trash TMDLs that are currently in effect. This current effort is not a reconsideration of any of the trash TMDLs

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		River leading to the risk of higher counts of bacteria associated with trash that once it reaches the beaches and ocean will break into smaller particles.	<p>themselves. The Ventura River Estuary Trash TMDL was last reconsidered and revised in 2019. At that time, no additional Responsible Entities were added to the TMDL.</p> <p>If additional data is submitted in the future, the TMDL can be reconsidered again to add additional entities.</p>
13.7	Bluewater Task Force	we think the TMDL needs to hold our local agencies more accountable for their lack of responsiveness to holding private entities for long term management of their trash from their jurisdictions	The proposed Trash WDRs are a regulatory mechanism to provide a tool by which the existing 11 trash TMDLs can be implemented. None of the existing TMDLs are being updated in this current effort.
14.1	Malibu Creek Watershed Management Program Group (Charmaine Yambao)	Allow Existing TMRPs to Continue if They Meet Draft WDR Requirements... The Draft WDR introduces new terminology...However, the Draft WDR does not change the requirements for these programs from those required in the Conditional Waiver. Despite this, the Draft WDR requires submission of a new NS TARP within three months of its effective date.	See response to comment 7.1.
14.2	Malibu Creek Watershed Management Program Group (Charmaine Yambao)	Maintain the Annual Monitoring Report December 15 Due Date... Section 8 of the Draft WDR staff report... The responsible entities request that the Draft WDR maintain the December 15 AMR deadline and only clarify the reporting period to include in the AMR (i.e., July 1 through June 30).	See response to comment 10.2.
14.3	Malibu Creek Watershed Management Program Group (Charmaine Yambao)	Remove New CEDEN Reporting Requirements Until Protocols for Submittal are Developed. The responsible parties have concerns about the new CEDEN reporting requirements required by the Draft	See response to comment 7.8.

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		<p>WDR.... The responsible parties find that the methodology that would be used to submit trash data to CEDEN is not clear. While permittees can work to provide trash assessment data to CEDEN, it is unclear how to use the habitat function of CED EN to document polygon reporting areas. Because this is a new process, there does not seem to be protocol or guidance to delineate areas assessed for nonpoint source trash requirements. To our knowledge, the polygon capability has only been used to designate habitat areas. Additionally, it is unclear if visual assessment data can be provided in a CEDEN compatible format. Implementing these requirements without clear protocols will increase costs for reporting and the lack of clarity on how to submit data to CEDEN will put responsible parties at risk of noncompliance.</p>	
14.4	<p>Malibu Creek Watershed Management Program Group (Charmaine Yambao)</p>	<p>Clarify Compliant Reporting Requirements... While we support meaningful public access to environmental information, we request a balanced approach to compliance reporting standards that recognizes the practical limitations and costs associated with certain documentation requirements.</p> <p>Trash TMDL AMRs rely heavily on photographic evidence to demonstrate site conditions, such as images of individual trash items measured against a ruler on a dark background. Providing detailed alternative text for each photograph may significantly increase reporting costs without proportionally enhancing public understanding. We encourage the LARWQCB to consider a reporting framework that supports accessibility in a meaningful and cost-</p>	See response to comment 7.9.

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		effective manner, especially for documentation types where alternative text may offer limited additional value to the public.	
15.1	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	Remove Requirements to Submit a New Monitoring Plan for the Trash TMDL...We are concerned that the Draft WDR does not adequately document the implementation history of the Trash TMDL or the evolution of the TMRPs, and unnecessarily requires the development of an additional planning document...the primary reason for requiring a new plan appears to be clarifying terminology, rather than introducing substantive changes. The Responsible Parties have demonstrated ongoing compliance, as documented in the Staff Report, and our approved TMRP already meets the Draft WDR's requirements. Preparing a new plan, which does not include new requirements, would be an unnecessary use of resources.	See response to 7.1.
15.2	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	Clarify the history and evolution of the TMRPs for Revolon Slough and Beardsley Wash. In Special Provision X.9.b, please add a footnote to "initial" stating: "Initial is defined as the frequency and locations applicable on the effective date of the Revolon Slough and Beardsley Wash Trash TMDL."	See response to comment 7.3. No change made.
15.3	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	Add a finding to the Draft WDR: "The County of Ventura, Ventura County Watershed Protection District, City of Camarillo, City of Oxnard, VCAILG, and Caltrans are implementing a TMRP and MFAC/BMP program approved under the Conditional Waiver to comply with the Revolon Slough and Beardsley Wash Trash TMDL. The approved TMRP and MFAC/BMP program are equivalent to the NSTARP, PAC, and PAC/BMP programs required by the Draft WDR for nonpoint sources."	See response to comment 7.1

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15.4	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	<p>Modify Background finding II.19 to allow responsible entities with approved TMRPs under the Conditional Waiver to continue implementing those programs without submitting a new plan.</p> <p>Suggested language: “All responsible entities will be required to submit a NSTARP within three months of the effective date of this order <u>or affirm the intent to continue implementing an approved TMRP. Responsible entities with existing TMRPs approved under the Conditional Waiver may continue implementation provided the TMRP satisfies the conditions of this WDR. Entities choosing to continue using an existing TMRP shall use the updated terminology in this WDR in future annual reports and correspondence.</u>”</p>	See response to comment 7.1.
15.5	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	<p>Modify Specific Provision X.9.f to require submission of an NSTARP only if the Responsible Parties do not have an equivalent approved TMRP under the Conditional Waiver. All future AMRs will use the new terminology for nonpoint source elements of the existing TMRP.</p> <p>Suggested language: “Responsible entities for the Revolon Slough and Beardsley Wash Trash TMDL shall submit a NSTARP <u>or affirm via letter to the Los Angeles Water Board that a TMRP approved by the Executive Officer to comply with Order R4-2020-0112 will continue to be implemented within three months of the effective date of this Order. The letter shall affirm that the responsible entities will utilize the terms NSTARP, PAC, and PAC/BMP in all future annual reports and correspondence referring to the nonpoint source elements of the TMRP.</u>”</p>	See response to comment 7.1.

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15.6	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	Remove the Requirement to Submit Data to CEDEN Until the Methodology is Confirmed...the methodology for submitting trash data to CEDEN is unclear. While permittees are willing to upload trash assessment data, it is not clear how to use CEDEN's habitat function to document polygon trash assessment areas. Additionally, it is unclear if visual assessment data can be uploaded in a CEDEN acceptable format. The lack of protocol or guidance increases reporting costs and the risk of noncompliance. ... Remove the requirements to upload data to CEDEN until guidance or protocols can be developed and tested. Include the substantial reporting cost increases associated with CEDEN reporting requirements in the Draft WDR Staff Report's cost analysis.	See response to comment 7.8.
15.7	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	Adjust Compliant Reporting Requirements...we respectfully request a balanced approach to the Trash TMDL reports—one that maintains accessibility while recognizing the practical limitations and costs associated with certain documentation requirements	Comment noted. See response to comment 7.9 for changes to accessibility requirements.
15.8	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	Balance accessibility requirements in the Draft WDR with meaningful resource allocation for public access, considering the practicality of creating alternative text for photographs that illustrate the narrative.	Comment noted. See response to comment 7.9.
15.9	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	Consider requiring only the main report to be ADA compliant but remove the requirement for supporting appendices and attachments that include field logs and photographs	See response to comment 7.9.
15.10	Revolon Slough and Beardsley	The Draft WDR General Provision IX.5 states that the annual NSTARP reports	See response to comment 10.2.

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	Wash Trash TMDL Responsible Parties (Jodi Switzer)	should be submitted by June 30 of every year. However, in Special Provision 9, it states that the Trash TMDL annual NSTARP report is due on December 15. Additionally, the Staff Report for the Draft WDR states that the due dates for all the annual NSTARP reports will be December 15. Please clarify the due date for the Trash TMDL annual NSTARP reports.	
15.11	Revolon Slough and Beardsley Wash Trash TMDL Responsible Parties (Jodi Switzer)	The Responsible Parties request clarification of information presented in the Draft WDR Staff Report, Section 4: Evaluation of the 2020 Trash Waiver, Table 2 titled "TMRPs and AMRs submitting in compliance with Trash Waiver". The number of responsible entities column does not seem accurate and may reflect number of reports received. For example, Table 2 states that there is only 1 responsible entity for the Revolon Slough and Beardsley Wash Trash TMDL, but in fact the six responsible entities named in this letter closely collaborate to implement the TMDL together. Please clarify the information in this table to accurately reflect the number of responsible entities for each TMDL and make corresponding changes to the report text.	The table has been updated to more clearly reflect Responsible Entities and other information.
16.1	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	The Responsible Parties developed an initial Trash Monitoring and Reporting Program (TMRP) in April 2009 which aligned with the monitoring frequency outlined in the Trash TMDL. Based on early monitoring experience both the Responsible Parties and the LA-RWQCB identified the need for a revised approach to prevent trash accumulation in the Estuary. In response, the Responsible Parties submitted a revised TMRP, approved by the LA-RWQCB in October 2013... When the Conditional Waiver was	See response to comment 7.1.

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		<p>adopted, it allowed Responsible Parties to submit a letter affirming their intent to continue using their existing TMRP for compliance... Given the success of the revised TMRP, the Responsible Parties chose to affirm their intent to continue its implementation, justifying that it met the Conditional Waiver requirements... The Responsible Parties are concerned that the Draft WDR does not adequately document the evolution of the Ventura River Estuary TMRP, nor does it allow for the continued use of the existing TMRP if it meets the Draft WDR requirements.</p>	
16.2	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	<p>The Draft WDR introduces new terminology – such as “Protocols for Assessment and Collection” or “PAC” instead of MFAC and “Nonpoint Source Trash Assessment and Reporting Plan” (“NSTARP”) instead of TMRP – but does not change the substantive requirements from the Conditional Waiver. However, the Draft WDR requires submission of a new NSTARP within three months of the Draft WDR’s effective date.</p>	See response to comment 12.3.
16.3	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	<p>Our review of the Draft WDR suggests that the requirement to submit a new plan is primarily to clarify distinctions between nonpoint and point source requirements and to update terminology. The Responsible Parties have demonstrated consistent compliance, as documented in the Draft WDR Staff Report, and have an approved TMRP that met the Conditional Waiver requirements. Since the Draft WDR requirements for the Trash TMDL are unchanged, the existing TMRP should suffice to meet the Draft WDR requirements. Preparing a new plan with no altered requirements is unwarranted</p>	See response to comment 7.1.

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16.4	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	<p><i>Clarify the history and evolution of TMRPs in the Ventura River Estuary: a. In Special Provision X.15.b, please include a footnote next to the word “initial” stating: “Initial is defined as the frequency and locations applicable on the effective date of the Ventura River Estuary Trash TMDL.”</i></p> <p><i>b. Modify Background finding II.19 to allow responsible entities with approved TMRPs to continue implementation without submitting a new plan. Suggested language:</i></p> <p><i>“All responsible entities will be required to submit a NSTARP within 3 months of the effective date of this order or affirm the intent to continue to implement an approved TMRP. Responsible entities that have existing TMRPs may continue implementation of that TMRP provided it satisfies the conditions of this WDR. Entities choosing to continue using an existing TMRP shall use the updated terminology in this WDR in future annual reports and when referring to the approved TMRP.”</i></p>	See response to comment 7.1 and 7.3.
16.5	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	<p><i>Modify Specific Provision X.15.f to include language like that which was included in the Conditional Waiver and only require the submittal of an NSTARP if the Responsible Parties do not have an equivalent approved TMRP under the Conditional Waiver. The language can require all future AMRs to use the new terminology in the Draft WDR for the nonpoint source elements of the TMRP if desired. Suggested language: a. “Responsible entities for the Ventura River Estuary Trash TMDL shall submit a NSTARP or shall affirm via letter to the Los Angeles Water Board that a TMRP approved by the Executive Officer will continue to be implemented and is sufficient to meet the requirements of this Order within</i></p>	See response to comment 7.1.

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		<i>three months of the effective date of this Order. The letter shall affirm that the responsible entities will utilize the terms NSTARP, PAC and PAC/BMP in all future annual reports and correspondence referring to the nonpoint source elements of TMRP.”</i>	
16.6	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	<p>Upon researching referenced capabilities, the methodology for submitting trash data to CEDEN is unclear. While permittees are willing to provide trash assessment data to CEDEN, it is unclear how to use the habitat function of CEDEN to document polygon reporting areas. This new process lacks established protocols and has only been used for habitat designation, not to delineate areas that are monitored for nonpoint sources of trash. Additionally, it is unclear if visual assessment data can be easily provided in a CEDEN compatible format. Developing methods for trash monitoring area submission will increase costs, and the lack of clear guidance increases the risk of noncompliance.</p> <p><i>Recommended changes:</i></p> <ol style="list-style-type: none"> 1. Remove requirements to submit data to CEDEN until guidance or protocols are developed and tested. 2. If the requirement is maintained, include the substantial reporting cost increases for CEDEN requirements in the Draft WDR Staff Report’s cost analysis. 	See response to comment 7.8.
16.7	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	We support meaningful public access to environmental information and compliance reports in alignment with accessibility requirements. However, we respectfully request a balanced approach to compliance reporting standards—one that maintains accessibility while recognizing practical limitations and costs...	See response to comment 7.9.

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		<p><i>Recommended changes:</i></p> <p><i>1. Evaluate the reporting accessibility requirements in the Draft WDR to balance requirements with the resources needed to meet the requirements and the information types necessary for Trash TMDL reporting.</i></p> <p><i>2. Consider the practicality of creating alternative text for photographs that are themselves illustrating the narrative and field logs which substantially increase costs. One option could be to require the main report to be compliant but not supporting appendices and attachments that include field logs and photographs.</i></p> <p><i>3. Include the substantial cost for compliant reports in the Draft WDR Staff Report's cost analysis.</i></p>	
16.8	Ventura River Estuary Trash TMDL Responsible Parties (Hayley Luna)	<p>The Responsible Parties request clarification of information presented in the Draft WDR Staff Report, Section 4: Evaluation of the 2020 Trash Waiver, Table 2 titled "TMRPs and AMRs submitting in compliance with Trash Waiver". The number of responsible entities column does not seem accurate and may reflect number of reports received. For example, Table 2 states that there is only 1 responsible entity for the Ventura River Estuary Trash TMDL, but in fact the seven responsible entities named in this letter closely collaborate to implement the TMDL together. Please clarify the information in this table to accurately reflect the number of responsible entities for each TMDL and make corresponding changes to the report text.</p>	The staff report has been updated to reflect the correct number of responsible entities.
17.1	Ventura Land Trust (Daniel Hulst)	Ventura Land Trust supports comments regarding reporting from the Ventura River Estuary Trash TMDL group, Calleguas Creek TMDL group (i.e., Revolon Slough and Beardsley Wash),	Comment noted.

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		and Upper Malibu Creek Trash TMDL group, as follows:	
17.2	Ventura Land Trust (Daniel Hulst)	•Ventura River Estuary Trash TMDL Group Comment Letter-Comment #2: Remove CEDEN Reporting Requirements Until a Clear Methodology is Defined	See response to comment 7.8.
17.3	Ventura Land Trust (Daniel Hulst)	•Ventura River Estuary Trash TMDL Group Comment Letter-Comment #3: Clarify Reporting Requirements	See response to comment 7.9.
17.4	Ventura Land Trust (Daniel Hulst)	•Calleguas Creek TMDL Group Comment Letter -Comment #2: Remove the Requirement to Submit Data to CEDEN Until the Methodology is Confirmed	See response to comment 7.8.
17.5	Ventura Land Trust (Daniel Hulst)	•Calleguas Creek TMDL Group Comment Letter -Comment #3: Adjust Compliant Reporting Requirements	See response to comment 7.9.
17.6	Ventura Land Trust (Daniel Hulst)	•Upper Malibu Creek Watershed Trash TMDL Group Comment Letter-Comment #3: Remove CEDEN Reporting Requirements Until a Clear Methodology for Submitting the Trash Data has been Defined	See response to comment 7.8.
17.7	Ventura Land Trust (Daniel Hulst)	•Upper Malibu Creek Watershed Trash TMDL Group Comment Letter-Comment #4: Clarify Reporting Requirements	See response to comment 7.9.