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Water Body Pollutant Classification				
1	Section 1	Part VI.C.5.a	<u>Applicable TMDLs and Implementation Schedules</u> • Make the following revisions to Section 1.3.3: • Update Table 1-4 (pg. 1-9) to acknowledge the recent revisions to the Ballona Creek Trash TMDL (Resolution No. R15-006 adopted on June 11, 2015). It should be noted that while the LACFCD is not assigned a WLA in the Ballona Creek Trash TMDL, per Resolution No. R15-006, the LACFCD is identified as responsible for certain actions related to TMDL implementation. • On page 1-9, the discussion at the top of the page needs to be corrected regarding the Santa Monica Bay Beaches Bacteria TMDL. WLAs are established for BC-1 (at Dockweiler Beach), which apply to the MS4 Permittees in the Ballona Creek Watershed. Accordingly, the SMB Beaches Bacteria TMDL should be included in Table 1-4 and 1-5 and the rest of the EWMP, as appropriate.	Table 1-4 has been revised to include Santa Monica Bay Beaches Bacteria TMDL and Ballona Creek Trash TMDL. Footnotes have also been revised to briefly describe the requirement of LACFCD in the trash TMDL revision.
2	Section 3	Part VI.C.5.a	<u>Water Body-Pollutant Combinations</u> Revise Section 3 of the EWMP: • Include the Table 3 Summary of Ballona Creek Water Body-Pollutant Categories from Appendix 3.A in the main EWMP document;	• Added Water Body-Pollutant Categories summary tables from Appendix 3.A to the main EWMP document. • Added a table to the main EWMP document providing references for Category 1 interim and final

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			• List the applicable interim and final WQBELs and receiving water limitations for each identified Category 1, 2, and 3 pollutant.	WQBELs and identifying receiving water limitations utilized to identify Category 2 and 3 pollutants.
Selection of Watershed Control Measures				
3	Section 4.3	Part VI.C.5.b	<u>Regional Projects on Private Parcels</u> In the Group's EWMP Implementation Strategy, regional projects on private parcels make up 52% of the control measure capacity to be implemented by 2021. The Group needs to elaborate on the feasibility of such a strategy and detail its process for implementing these BMPs. The Group must explicitly state any difficulties or issues that may be faced with this strategy and these types of projects. Furthermore, the Group should identify potential alternative approaches that it can pursue and consider the following: • Are regional projects on private parcels (to the extent identified in the EWMP Implementation Strategy) ultimately necessary to achieve load reductions in the watershed? • Are there scenarios where the 52% implementation number can be reduced to a lower percentage of the EWMP's control measures (*e.g.* 10%, 20%, *etc.*)? And if so, what would be the change in implementation costs?	• Not all BC EWMP Group members included Medium Projects in their EWMP Implementation Strategy. However, Medium projects could be included during adaptive management and implemented as partnership-driven alternatives to Regional Private Projects for potential cost savings. • The EWMP includes a robust adaptive management program that will continue to identify and prioritize the best locations, sizes, and types of BMPs for pollutant reduction. Over time, if additional parcels are identified that could provide cost-effective opportunities for implementing regional projects (e.g., school district properties), then public regional projects would make up an even larger component of the EWMP. • Language regarding the feasibility of a large percentage of control measures on private parcels was incorporated into the final EWMP.

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4	Section 4.5	Part VI.C.5.b	<u>Information on Signature Regional Projects</u> The Group must include the following additional information on the listed signature regional projects: • Provide milestones and timelines for each project; • Include the rainfall depth (in inches), rainfall volume, and storm water runoff volume associated with each project; • Identify the responsibilities of each participating Permittee for each project; • In as much detail as possible, further articulate what the anticipated multi-benefits are for each project; • Clarify and/or correct the signature project fact sheets for Culver Boulevard Median, Plummer Park, Queen Anne Recreation Center, Poinsettia Park, and Lafayette Park (Figures 4-12, 4-20, 4-24, 4-28, and 4-36). These fact sheets appear to incorrectly list the Design Storm Event for these projects as "85th Percentile, 24 hr." Table 4-1 indicates that these projects do not retain the 85th percentile, 24- hour storm event.	• Additional information on signature regional projects can/will be provided, given the assistance and cooperation of the WMG members. o Bullets 1, 3, and 4: developed in conjunction with WMG members via conference calls. o Bullet 2: Approximate captured rainfall depth was estimated; Note that the recommended BMP volume represents the runoff volume capture potential when the system is empty, although it is not appropriate to compare BMPs sized by long-term simulation to synthetic design storms (i.e. antecedent conditions in long-term simulations nullify the significance of design storm depth metrics. o Bullet 5: Signature Project Fact Sheets were corrected/updated to reflect Table 4-1. Design drainage area listed in Table 4-1 reflects either the maximum or alternative drainage area based on design purposes.
5	Section 5.3	Part VI.C.5.b	<u>Green Streets</u> The "green street volume utilization" is 60-80% in many areas within the watershed. The Group needs to elaborate on the feasibility of achieving such percentages within the watershed and describe any difficulties or issues that may be faced with implementation.	• Added language regarding the high reliance on green streets – please see next bullet. • The “data limitations” noted in the draft EWMP are related to ground truthing parameters that will be used to refine the design, including soil characteristics underlying streets, slope, street crown, curb and

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			In the program highlights box (pg. 5-4), the Group notes that "[d]ata limitations currently hamper decision making." The Group must elaborate on these limitations and how these limitations will be addressed.	gutter design, retention design characteristics, drainage area, and interconnections of street conveyance systems. These data limitations and the refinement work to obtain these data will be described in detail in the final EWMP.
6	Section 5.6	Part VI.C.5.b	<u>Enhanced Institutional Control Measures</u> Although the Group's Reasonable Assurance Analysis does not incorporate reductions from "enhanced" institutional control measures beyond the minimum control measures (MCMs), the Group mentions that it is anticipated that Group members "will consider and implement enhanced institutional control measures to reduce the level of structural control measures." If possible, the Group should provide additional information on these potential enhanced control measures, including: • The types of control measures being considered by Group members; • Any timelines for when these enhanced institutional controls will be considered.	The following text has been added to the paragraph in Section 5.6: “Enhanced institutional control measures that are already being implemented include additional street sweeping and increased catch basin and storm drain cleaning. The BC EWMP Group members are routinely reviewing new or enhanced non-structural BMPs that target the pollutants of concern in the Ballona Creek Watershed. As new or modified institutional control measures are identified, they will be evaluated and incorporated as part of each jurisdiction’s control programs.”
7	Section 7.4		<u>Non-Stormwater Strategy and Control Measures</u> Include additional information on the Group's dry-weather strategies described in Section 7.4: • Clarify if the Group is relying on its dry-weather bacteria strategy to address any pollutants aside from bacteria. If so, include the interim tasks and schedule for the North Outfall Treatment Facility (NOTF), Sepulveda Channel LFTF,	• Clarifying language was added to Section 7.4 as follows: o The reductions shown in Figure 7-15 are wholly based on wet weather BMP effectiveness. o The TSO projects are specific to bacteria; other pollutants will be addressed by wet weather

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			and Centinela Creek Diversion Project BMPs as included in the Draft Pollution Prevention Plan for Time Schedule Order No. R4-2015-0108 submitted on July 13, 2015 to the Regional Water Board. • Clarify whether the elimination of non-stormwater flows includes authorized and exempt non-stormwater discharges through the MS4. • Explain the how the non-stormwater elimination will be achieved as indicated in Figure 7-15. In particular, explain what will produce the 2019 to 2021 reduction in volume (*e.g.*, 40.9 acre-ft to 0 acre-ft for the City of Los Angeles). Additionally, clarify whether this figure assumes that the NOTF and the Sepulveda Channel LFTF will be diversion BMPs as opposed to treatment BMPs; or if this figure is based wholly on the water use/wet weather BMP capacity analysis.	control measures. Thus, the tasks and schedule for TSO projects were not added to the EWMP. o The wet weather control measures will address all dry weather runoff, both authorized and exempt.
Enhanced Watershed Management Program Provisions				
8	Section 4.5	Part VI.C.l.g	<u>Retention of NSW runoff and 85th percentile:</u> The Group identifies which of the signature regional projects are able to retain the 85th percentile, 24-hour storm event. For the remaining regional projects, clarify in Section 4.5 and/or Appendix 4.B when the Group will determine which projects will be able to retain all non-storm water runoff and the 85th percentile, 24-hour storm. It is acceptable to identify this in the future as part of the Group's general design and	• Which regional projects can retain the 85th percentile storm events will be clearly identified. • Language was added to the footnote in Section 4.3 regarding the timeline for evaluating feasibility in detail.

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			engineering analyses; however the EWMP must at least specify this.	
9	Section 9.3	Part VI.C.l.g.ix	<u>Financial Strategy</u> The Group's financial strategy must be revised to provide more specific information: • Given the Group's soon approaching final compliance date of 2021, the financial strategy needs to detail a process for securing the funding needed for the EWMP Implementation Strategy. • The Group should specify sources of funding for signature regional projects and other near-term projects. If no funding is in place, the Group should identify their process for securing this funding. • The Group states that "[t]he BC EWMP Group as a whole, as well as individual Group members, is currently prioritizing and selecting the specific financing strategies that best fit its members' needs." The revised EWMP should include this prioritization and selection of specific financing strategies. • The Group needs to provide more detail on the potential funding sources listed in Sections 9.3.1 through 9.3.3. The Group should evaluate the challenges, potential, and feasibility of securing each potential funding source. Furthermore, if possible, the Group should also quantify the funding available from each source.	• The EWMP was revised to provide additional details on the process for securing funding needed for the EWMP Implementation Strategy. • The EWMP was revised to more clearly outline prioritized potential funding sources considered best suited for signature projects. Although funding for design and construction has not been identified for all signature projects the process for securing the funding has been outlined. • The EWMP was revised to include a general prioritization of the various financing strategies based on BMP type. • The EWMP was revised to provide more detail on the potential funding sources as well as to identify potential challenges, feasibility of developing the funding source, and a general quantification of funding available from each source. • The EWMP was revised to provide updates where available and clarify potential future steps.

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			• The Group discusses the formation of a subcommittee on funding and identifies the components of a "Stormwater Program Financial Plan," including: Implementation of New Fee or Charge, Establishment of New Enterprise Fund, Cash and Debt Financing, Operating and Capital Reserves, and Cash Flow Modeling. The revised EWMP should provide detail regarding the actual establishment of this subcommittee and the actual progress on achieving the identified financial plan components.	
Reasonable Assurance Analysis (RAA)				
10	Section 6.2.4		<u>BC Wetlands TMDL for Sediment and Invasive Exotic Vegetation</u> Provide an explanation how the EWMP/RAA addresses the waste load allocation for sediment established in the Ballona Creek Wetlands TMDL for Sediment and Invasive Exotic Vegetation.	• Clarification added to Section 6.2.4
11	Section 6.2.5.1 & Figure 6-6	Part VI.C.5.b.iv.(5)	<u>90th Percentile Exceedance Volume</u> The critical condition used for metals is the 90th percentile Exceedance Volume. The Group must add further clarification regarding this critical condition: • Provide detail on how the Exceedance Volumes were calculated. Explain whether actual or modeled flows and concentrations were used for these calculations.	• A new Appendix 6-I was created to provide additional information requested by the Regional Board including information on the Exceedance Volume calculation methodology.

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			• Provide detail on how Exceedance Volumes are used in defining average conditions for interim limitations.	
12	Sections 7.1, 8.1, and 8.2		<u>EWMP Implementation Strategy Compliance</u> In explaining its EWMP Implementation Strategy, the Group states: "the network of control measures that provides reasonable assurance of achieving the Compliance Targets is referred to as the EWMP Implementation Strategy. The identified BMPs (and BMP preferences) will likely evolve over the course of the EWMP Implementation through an adaptive management paradigm and in response to "lessons learned." As such, it is anticipated the BMP capacities within the various subcategories will be reported to the Regional Board but not tracked explicitly by the Regional Board for compliance determination. As BMPs are substituted over the course of EWMP implementation (*e.g.*, replace green street capacity in a subwatershed with additional regional BMP capacity), the Group will show equivalency for achieving the corresponding Compliance Target." Give further detail on how equivalency will be calculated and determined, and what kind of information will be provided to show equivalency. In addition, provide example calculations and/or methodology to go along with the scenarios described in Section 8.2.4.	• Additional explanation of the equivalency calculations was added to Section 8.2.4.

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13	Section 9.2		<u>Existing Stormwater Programs Costs</u> Clarify this section to include the costs of Coordinated Integrated Monitoring Program (CIMP) monitoring. It is not clear if the monitoring costs noted for the City of Los Angeles and Unincorporated LA County already include Ballona Creek CIMP costs.	• CIMP costs not included.
14	Various Sections		<u>Miscellaneous</u> Clarify the following: • Section 6.2.5.1 (pg. 6-11) states: "In turn, the BC RAA analyzes the volume of runoff during each rolling 24-hour period of the 10-year simulation when water quality targets were exceeded, referred to as the 'Exceedance Volume' (see Figure 6-4)." It appears that the quote should reference Figure 6-6 instead. • Table 8-1 (pg. 8-2) is titled: "WMP Control Measures to be Assessed for Compliance Determination with ULAR EWMP if..." The underlined should be changed to "BCWMG EWMP."	• Fixed
1			The model results of water quality calibration for total sediment as shown in Table 6-2 indicated that there is a difference in modeled load versus observed load for total sediment of -33.5%. In addition, the difference in modeled and observed values for E. coli is -31.6%. Therefore, additional	• Language was added to Section 6.2.2 regarding additional data to be considered during future baseline model updates.

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			discussion should be provided regarding the greater error between modeled and observed values for total sediment and E. coli and potential explanations for this discrepancy. Further, data needed to improve model calibration for total sediment and E. coli should be identified along with a commitment to collect the necessary data and recalibrate the model using these data.	
2			Correct titles of Figures 6A-26 and 6A-27, which are plots of fecal coliform not total lead.	• Corrected the figure titles
3			The critical condition for metals defined as 90th percentile Exceedance Volume (EV) as explained in Section 6.2.5.1. Board staff understands that this EV approach provides assurance that the receiving water limitations (RWLs) will be met instream. Please also provide a comparison of the EV by subbasin with the 90th percentile of pollutant concentration and load to demonstrate that the EV approach is protective relative to other metrics including the 90th percentile pollutant load. For toxics, provide data to support the selection of the 2007/2008 water year as the critical year, such as rainfall, daily storm volume and toxics concentration data or other data as appropriate. As such, provide statistical analyses including: 1) frequency curves for the data above and 2) flow/load duration curves in the receiving water body by using the most recent 10-year period of data to confirm that the 2007/2008 water year is an appropriate condition.	• Added bar graph comparing 90th percentile conditions for total zinc with the EV approach in new Appendix 6-I
4			In addition to the EV statistics, provide the model results of the baseline condition in terms of runoff volume, pollutant	• Added tables summarizing model results by assessment area in new Appendix 6-I

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			concentration, and pollutant loadings based on the 90th percentile critical condition of runoff volume and pollutant concentration at each subbasin for each limiting pollutant. In addition, please provide the estimated allowable loads and required load reductions on a pollutant-by-pollutant basis.	
5			Finally, please provide an example validation for a representative waterbody within the Ballona Creek Watershed, or in another EWMP area using a similar RAA approach, that demonstrates that with all proposed BMPs in place, as determined from the initial analysis of the necessary volume and/or pollutant load reduction, the RWLs will be achieved.	• Added example regional validation discussion in Appendix 6-I