Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
1	Regional Board			The draft EWMP does not consider the Indicator Bacteria in the San Gabriel River, Estuary, and Tributaries TMDL (San Gabriel River Bacteria TMDL) in Basin Plan Amendment Resolution No. R15-005 Attachment A (adopted by the Regional Board on June 10, 2015) which is anticipated to be effective by the next permit cycle (assuming a TMDL effective date of early to mid-2016). Revise the draft EWMP to reference the San Gabriel River Bacteria TMDL, which addresses bacteria impairment in Big Dalton Wash among other waterbodies in the SGR Watershed. For reference, see Basin Plan Amendment Table 7-41.2 footnote 5 and the staff report page 21, 31, and 35.	The EWMP was revised to identify the June 10, 2015 LARWQCB adoption of the SGR Bacteria TMDL. Applicable TMDLs, reviewed staff reports, water quality priorities, schedules, etc. were revised to include the TMDL.	Revision made	Addressed	
2	Regional Board	Figures 4-14 & 4-15, pages 135-136		Present cumulative values of rainfall and runoff related to the graphs in Figures 4-14 and 4-15 (i.e., the 24-hour storm event size for LAR and SGR, respectively).	Based on input from the Regional Board, the volume identified in the narrative was also displayed on the figures.	Comment addressed	Addressed	
3	Regional Board	Section 1.6		Revise Section 1.6 as the petitions (SWRCB/OCC File Nos. A2236) were resolved by the State Board on June 16, 2015 through its Order WQ 2015-0075. Delete all but the last sentence of the "reservation" included as a contingency in the EWMP while that petition process was underway.	This section was revised.	Reference to SWRCB/OCC File Nos. A2236 was removed.	Addressed	
4	Regional Board	Figure 2-1, page 22	Part VI.C.5.a.iii.(1)(b)	Include MS4 outfall locations on (a) map(s). (Monitoring sites are shown on Figure 2-1, page 22. Planned regional BMPs are seen on page 60. Planned distributed BMPs are on page 62. Potential project sites are on pages 64-65.)	A new figure (Figure 1-6) was added to demonstrate where the outfalls within the RH/SGRWQG are located based on current CIMP data.	Figure 1-6 now has MS4 out fall locations.	Addressed	

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5	Regional Board	Page 37		The EWMP states that, "Opportunities to implement sediment control BMPs will determine whether it is practicable to achieve the numeric sediment-borne WQOs." Delete or modify this statement such that the Group commits to implement sediment control BMPs, or use alternative approaches as determined through its adaptive management process, to control discharges of bis(2-ethylhexyl)phthalate from the Permittees' MS4s that could cause or contribute to exceedances of Receiving Water Limitations.	Statement was deleted.	Statement was not deleted. Please delete or respond to us.	Statement was deleted.	Okay.
6	Regional Board	Page 38	Parts VI.C.6.a and VI.C.8.a.ii-iii	Modify the following statement in the EWMP as follows, "The schedule identified in this EWMP ~~remains tentative and~~ is subject to change based on changing data, information, legislation, law, and fiscal priorities through the adaptive management process. Any schedule modifications will be consistent with TMDL related compliance schedules and will be submitted to the Regional Board for review and approval per the requirements of the LA County MS4 Permit."	Accept the revision.	Statement was added.	Addressed	
7	Regional Board	Page 46		The information in the draft EWMP regarding existing institutional BMPs is lacking in detail. The EWMP must be revised to include more details on the existing MCMs/institutional BMPs, including the scope of implementation (i.e., which Permittees are implementing each measure in Section 3.1.1) and a description adequate to understand the linkage between the BMP and water quality (e.g., "scheduling," "water trucks," etc.).	Attachment P was expanded and additional narrative was added in Section 3.1.1.	The permittee involved in each MCM is now listed in Table P-1. I see the added paragraph in Section 3.1.1.	Addressed	
8	Regional Board	Table 2-2, page 23		Include a commitment to update the water quality characterization as more water quality data become available through the CIMP for waterbodies such as Little Santa Anita Canyon Creek/Santa Anita Wash, Monrovia Canyon Wash, Sawpit Wash, and Little Dalton Wash.	Commitment added before Table 2-2.	Comment included	Addressed	

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9	Regional Board	Section 2.2	Part VI.C.5.a.ii	The EWMP does not identify Category 3 pollutants. However, Table D-1 indicates that there are some pollutants that have exceeded water quality objectives in the past 5 years, but for which a TMDL has not be established. Include these pollutants as Category 3 pollutants in the EWMP, or provide an explanation for excluding these pollutants. See also Enclosure 2.	Based on communications with the Regional Board, a footnote was added to Table 2-5 stating that the exceedance analysis data was based on data collected downstream, which is not directly related to the RH/SGRWQG. As CIMP data is collected, Category 3 WBPCs will be reassessed with relevant data and updated through the Adaptive Management Process as appropriate.	The following footnote was added to Table 2-5. 7 Pollutants noted with exceedances in Table 2-3 that are not associated with an existing TMDL or 303(d) listing have not been identified as Category 3 pollutants because the data analyzed is from areas downstream of the RH/SGRWQG. How far downstream? Once CIMP data has been collected for the group area, Category 3 pollutants will be identified as WBPCs through the Adaptive Management Process, as appropriate. Based on the first CIMP wet-weather monitoring event, exceedances were not detected for potential Category 3 WBPCs.	Footnote number 8 (was footnote 7 in previous submittal) was revised to point readers to Figure 2-1 which illustrates the locations monitoring data was collected from. Not including Category 3 pollutants until additional CIMP data is collected was discussed with the Regional Board prior to the previous submittal.	Areas are far enough downstream so explanation is okay.
10	Regional Board	Table 2-5	Part VI.C.5.a.ii (page 60)	Revise Table 2-5 and other applicable sections of the draft EWMP, including corresponding tables in Attachment C, to address the following comments: ➢ Add a note to the table to acknowledge that although the City of Azusa is in the Santa Fe Dam Park Lake subwatershed, the USEPA Los				
					Footnote was added in Table 2-5.	Note has been added.	Addressed	

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
				Angeles Area Lakes TMDL for Nitrogen, Phosphorous, Mercury, Trash, Organochlorine Pesticides, and PCBs (Los Angeles Area Lakes TMDL) states that there are no MS4 discharges to Santa Fe Dam Park Lake (p. 11-16 of Los Angeles Area Lakes TMDL). ➢ Add a note to Monrovia Wash to acknowledge that Monrovia Canyon Creek is 303(d) listed for lead. However, the Los Angeles River and Tributaries Metals TMDL (Basin Plan Amendment Resolution No. RI0-003 Attachment A) only assigns a dry-weather load allocation for nonpoint sources and therefore, no WLA is assigned for MS4 sources. ➢ Category 1A, Nutrients: Add Nitrate+Nitrite and denote with "(F)" for Rio Hondo Reach 3, Monrovia Wash, and Sawpit Wash. ➢ Category 1A, 1B: Omit rows for Copper (dry), Lead (dry), and Zinc (dry). ➢ Category 1A, Copper (wet),	Regional Board clarified that once lead (dry) was eliminated from the list (per two comments below) then a Category 2 WBPC made sense for Monrovia Wash.	Lead was added to category II for Monrovia Wash in Table 2-5.	Addressed	
					This was added to the table.	Added.	Addressed	
					Removed based on conversation with the Regional Board.	Omission made.	Addressed	
					Clarified with the Regional Board that the comment was intended to discuss lead only (not copper) and was intended to discuss Category 1C WBPCs rather than 1A. A note was added to the Category 1C heading based on the comment.	Comment was intended to discuss lead only (not copper) and was intended to discuss Category 1C WBPCs rather than 1A. A note was added to the Category 1C heading based on the comment.	Addressed	
					Footnote was added to the table.	Note was added.	Addressed	
					Table was revised to include E. coli for Big Dalton Wash.	E. Coli was added for Big Dalton Wash but under Category 1B.	Addressed	

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
				Peck Road Park Lake: Add a note stating that as per the USEPA Los Angeles Area Lakes TMDL (page 4-1 and 4-22), lead is currently meeting numeric targets for water and sediment (wet and dry weather) and therefore, no WLA was assigned. ➢ Category A (Nutrients, Metals, Trash) and Category 1B (Metals and Bacteria): Add a note stating that MS4 discharges from Sawpit Wash, Santa Anita Wash, and direct MS4 discharges to Peck Road Park Lake are subject to the Los Angeles River and Tributaries Metals TMDL (LA River Metals TMDL) and the Los Angeles River Watershed Bacteria TMDL (LA River Bacteria TMDL). ➢ Category 2C: Include bacteria (E. coli) for Big Dalton Wash per the finding in the SGR Bacteria TMDL (June 2015) that Big Dalton Wash is impaired by indicator bacteria. ➢ Add Category 3 pollutants as appropriate based on Appendix D receiving water analysis.	Footnote was added to the table (see response to comment above).	Category 3 pollutants were added. I don't believe that Appendix D was the correct reference but footnotes added were appropriate.		

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11	Regional Board	Section 2.3	Part VI.C.5.a.iii	The EWMP must be revised to include all relevant findings regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters from all of the following programs: ➢ Permittee(s)' IC/IDE programs ➢ Industrial/Commercial Facilities Pollutant Control programs ➢ Development Construction programs, and ➢ Public Agency Activities programs.	A discussion on the available information from the programs listed in the comment was added in the source assessment section.	I see a lot of added material in 2.3.3.1 through 2.3.3.6 on TMDL findings but I do not see added material in the Source Assessment section that addresses findings from these 4 programs. If you have findings from these 4 programs, please present them.	Additional narrative was added to Section 2.3.3 under the bulleted list. The additional narrative clarifies that information from these programs was compiled and reviewed, but did not provide information pertaining to source assessment.	Okay.
12	Regional Board	Table 2-6, page 29	Part VI.C.5.a.iii.(1)(a)(v)	Include all details from applicable TMDL source investigations regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters, including from the recently adopted SGR Bacteria TMDL (June 2015).	Some of this information has been included (Table 2-7), but additional information from TMDL Staff Reports was also added. Information from the SGR Bacteria TMDL was also incorporated.	Findings from the TMDLs are contained in Sections 2.3.3.1 through 2.3.3.6.	Addressed	
13	Regional Board	Section 2.3	Part VI.C.5.a.iii.(1)(a)(vi)	Review all TMDL Staff Reports, TMDL Implementation Plan(s) and supporting documents, if developed (see TMDL Reporting Requirements in Attachment E, Part XIX, pages E-45 to E-62); and other watershed management plans to determine if there are any watershed model results. If watershed model results exist, include them in the revised EWMP.	TMDL Staff Reports and Implementation Plans were reviewed and models are discussed and briefly summarized in the EWMP.	RTC seems reasonable. "At this time, models are not specific enough to accommodate a few specific sources, let alone the impact of a major source such as copper in brake pads. Current models are inadequate for distinguishing copper loads from a residential area adjacent to a freeway with those from a rural area. Such sources will likely be identified through implementation of the CIMP and the Adaptive Management Process."	Addressed	

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
14	Regional Board	Table 2-8, page 29	Part VI.C.5.a.iii.(1)(a)(vii)	Include all details from Permittee(s)' monitoring programs regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters.	Permittees do not have any individual monitoring programs. All monitoring data has been reviewed and is included in the EWMP. This data does not identify sources and this discussion has been added to the EWMP.	RTC seems reasonable. "Permittees do not have any individual monitoring programs. All monitoring data has been reviewed and is included in the EWMP. This data does not identify sources and this discussion has been added to the EWMP."	Addressed	
15	Regional Board	Table 2-8 and Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Add Big Dalton Wash for bacteria as a category 2 pollutant in Table 2-8 of the draft EWMP as per the Indicator Bacteria in the San Gabriel River, Estuary, and Tributaries TMDL (San Gabriel River Bacteria TMDL) in Basin Plan Amendment Resolution No. R15-005 Attachment A (adopted by the Regional Board on June 10, 2015) which is anticipated to be effective by the next permit cycle. Additionally, add a discussion on bacteria in Section 2.3.3 referencing the SGR Bacteria TMDL (Table 7-41.2 footnote 5) and the staff report (p. 21, 31, and 35). Revise other applicable EWMP sections accordingly.	A discussion referencing the SGR Bacteria TMDL was added to Section 2.3.3 (Specific Constituents, under Source Assessment). Revisions were made to Table 2-8.	In section 2.3.3.6 Source Assessment Summary under table 2-7 there is discussion of bacteria for Big Dalton Wash. Table 2-8, however, has no discussion of bacteria as your RTC says it would.	Addressed Sorry for the confusion. A table was deleted between the first submittal and the previous submittal. What was originally referred to as Table 2-8 was changed to Table 2-7 (Water Quality Priorities for the RH/SGRWQG). This table was revised to include SGR, San Dimas Wash, and Big Dalton Wash under bacteria.	Okay.

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16	Regional Board	Table 2-8 and Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Table 2-8 of the draft EWMP lists Peck Road Park Lake for Bacteria as a Category 1 pollutant rated high for MS4 linkage. Add a footnote clarifying that Peck Road Park Lake does not have a TMDL or 303{d) listing for bacteria but was categorized as a Category 1 pollutant based on source assessment. Revise other applicable EWMP sections accordingly.	Revisions were made to Table 2-8.	In Table 2-8 "Initial Classification for USEPA TMDLs, 303(d) Listings, and Other Exceedances of RWLs" discussion of bacteria was pulled out altogether. It should be in the table or as a footnote to the table and qualified as the RB comment indicated and as indicated in the comment above rather than just pulled out from the table.	The original comment now applies to Table 2-7 (see discussion in response to comment 15). There was a misunderstanding, but Peck Road Park Lake was added back to Table 2-7 in association with bacteria and this was also updated in Table 2-5 (Summary of RH/SGRWQG WBPC Categories). A footnote was included in Table 2-5 explaining that Peck Road Park Lake, Monrovia Wash, and Sawpit Wash are considered a Category 1 WBPC (with bacteria) during extreme wet-weather events, otherwise hydrologically disconnected to Rio Hondo/LAR.	This seems to be related to the spreading grounds, correct? You cannot state you are conditionally exempt for a Category 1 pollutant. This would be a determination that would need to go through the basin plan amendment process. You may state that there seems to be a hydrologic disconnect during most conditions (except high flow) under dry weather conditions. Provide documentation of the hydrologic disconnect. However, you need to acknowledge that you are responsible for the pollutants.
17	Regional Board	Table 2-8 and Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Table 2-5 of the draft EWMP lists San Dimas Wash and Big Dalton Wash for lead as a Category 1 pollutant as per the Los Angeles River and Tributaries Metals TMDL (LA River Metals TMDL). Explain in Section 2.3.3 why Table 2-8 does not include San Dimas Wash and Big Dalton Wash as a Category 1 pollutant for lead (i.e., no exceedances based on data). Add San Dimas Wash and Big Dalton Wash in Table 2-8 of the draft EWMP for category 1 pollutant lead, unless there justification is provided for not adding these waterbodies. Revise other sections of the EWMP accordingly.	Table 2-8 was revised to be consistent with Table 2-5.	You indicate that, "Table 2-8 was revised to be consistent with Table 2-5." However, I don't see this to be the case as there is no mention of lead or metals in Table 2-8. Perhaps to you forgot to follow through?	The original comment now applies to Table 2-7 (see discussion in response to comment 15). The tables are consistent in that all WBPCs are correctly identified in both tables.	Okay.

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18	Regional Board	Table 2-8 and Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Explain in Section 2.3.3 of the draft EWMP if there are any MS4 sources or significant exceedances based on data for cadmium, copper, and zinc in Peck Road Park Lake. If so, add to Table 2-8 of the draft EWMP for the aforementioned metals as a Category 3 pollutant or a Category 2 pollutant if it meets 303(d) listing criteria. Revise other applicable sections of the EWMP accordingly.	Based on the available data from CWH, cadmium, copper, and zinc data are not available for Peck Road Park Lake. Monitoring sites for LAR Metals TMDL CMP are significantly downstream of Peck Road Park Lake. This data is not representative of concentrations and loadings to Peck Road Park Lake for cadimium, copper, and zinc. Per CEDEN, SWAMP Monitoring data for tissue from 1986 to 1992 is available for cadimium, copper, and zinc. Monitoring data upstream of Peck Road Park Lake is not available at this time and the analysis to determine where the MS4 is a significant source cannot be conducted at this time.	Explanation appears okay.	Addressed	
19	Regional Board	Page 59	Part VI.C.1.g.iv	The EMWP should be revised to clarify the difference between the list of Regional BMP projects on page 59 and that in Table 3-23 on page 102 of the EWMP. "The following four projects exhibited the greatest potential of the planned regional BMP projects to possibly satisfy the regional EWMP project criteria. Some of these project sites were evaluated as part of the regional project screening further detailed in Section 3.2.4." ➢ Buena Vista Wetlands ➢ Hugo Reid Park Infiltration Basin Project ➢ Monrovia Station Square Project ➢ Whittier Narrows Park Project (EWMP, page 59) Identify which of these four projects were evaluated as part of the regional project screening in Section 3.2.4, and provide the results of the screening. For projects that were not evaluated as part of the regional project screening, provide an explanation for why they were not.	Additional discussion was added in Section 3.2.3 and a footnote was added to Table 3-4 in Section 3.2.4 to clearly identify which of the planned BMPs were screened.	The added paragraph in section 3.2.3 is helpful. However, the RTC says there will be and added footnote to Table 3-4 to clearly identify which of the planned BMPs were screened. The added footnotes do not seem to do this. They are: * More than one alternative for site was evaluated 1 Previously planned projects as described in Section 3.2.3 If the * is supposed to be which projects were screened, then only 3 were screened. Is this correct?	Footnote 1 was added in Table 3-4 to demonstrate which projects were previously planned, as described in Section 3.2.3, which is the section that discusses these projects in more detail. Footnote 1 was revised to further explain these projects are from existing implementation plans. Two projects were evaluated that were originally identified in planning documents (Hugo Reid Park and Buena Vista Spreading Grounds) and the explanation in Section 3.2.3 covers why other projects were not further screened (outside of the RH/SGRWQG area).	Okay.

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20	Regional Board	Section 3		Provide a detailed description on each of the selected Regional EWMP projects, describing the BMP in more detail. This should be done in either Section 3 or in a new Attachment. (Attachment E has a good academic discussion of various types of BMPs; however there is not a good description of each of the Regional EWMP projects that were on the final list of 10 EWMP Regional projects.)	A description of each of the proposed projects is provided in Section 3.4.2.1.	Comment responded to.	Addressed	
21	Regional Board	Table 3-1; Section 3.1.3, Page 49	Part VI.C.5.b.ii(1), page 62	Revise the EWMP to more clearly address non-stormwater. There is an assumption made by the EWMP that the control measures for addressing stormwater will also apply to non-stormwater.	Report was revised to clarify that non-stormwater will addressed through the CIMP NSWD source assessment.	Section 3.1.3 Approaches to Additional Non-Stormwater Discharge Control Measures" states that Response was that "Non-stormwater discharges throughout the RH/SGRWQG will be addressed through the CIMP non-stormwater discharge source assessment." Please see the Upper San Gabriel River EWMP, Section 5.4 for a section on non-stormwater milestones. A similar section should be developed for Rio Hondo/San Gabriel.	Section 3.1.3 was revised to reference Section 4.2. Results associated with the approach discussed in Section 4.2 were added to Section 4.2. The revised language and figures quantify the anticipated dry-weather flow/load reduction throughout the proposed implementation timeline and at the dry-weather TMDL milestones.	Okay.

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
22	Regional Board	Section 3	Part VI.C.5.b.iv(3), page 64	Include (or provide an explanation for not including) control measures identified in the Implementation Plan(s) submitted by Permittees subject to the LA River Metals TMDL. Acknowledge the upcoming submittal of dry weather bacteria LRS for segment B tributaries of the Los Angeles River.	Within Section 1.3.2 a statement was added to identify that the RH/SGRWQG will be preparing a LRS. Hugo Reid Park was the only project identified in the Metals TMDL Implementation Plan. It was added to the potential sites list and evaluated using the screening process discussed in the EWMP.	Final EWMP does not does not reference the upcoming submittal of the LRS for LAR Metals TMDL. The RTC does not respond to the second comment, "Acknowledge the upcoming submittal of dry weather bacteria LRS for segment B tributaries of the Los Angeles River."	We assume there may be some confusion regarding the existence of an LRS for the LAR Metals TMDL. A paragraph was added to Section 1.3.2 regarding the complexity of RH/SGRWQG area flows and necessity for developing an Alternative Compliance Strategy (ACS) with Board Staff. Since dry-weather flows from the group do not appear to contribute to observed impairments below Whittier Narrows Dam, additional time is warranted to develop a water conserving ACS.	Include a reference that the group is in the process of submitting an LRS for dry weather bacteria compliance.
23	Regional Board	Tables 3-6 and 3-7, pages 78-79	Part VI.C.5.b.iv.(4)(a) , page 64	The EWMP must be revised to specify which of the regional projects in Tables 3-6 and 3-7 will be implemented, justify why others will not be implemented, and clarify that in the body of the EWMP in section 3.2.4 and elsewhere, as appropriate.	Tables 3-6 and 3-7 were revised to include a bold line. The text was revised to explain the projects above the bold line are the projects that are to be implemented.	Modification is helpful.	Addressed	
24	Regional Board	Table 1-6	Part VI.C.5.c, page 66	Revise Table 1-6 of the draft EWMP to omit the row for SGR Metals and LAR Metals in dry weather. Also revise other applicable sections of the EWMP accordingly.	The schedule and discussions on the dry-weather metals TMDLs were removed from the EWMP.	Table 1-6 revised and I scanned other sections to see if other updates needed (seemed okay).	Addressed	
25	Regional Board	Table 1-6		Add a footnote to Table 1-6 of the draft EWMP to reference Attachment D "Key findings related to the Los Angeles River Nitrogen TMDL" of the draft EWMP.	Footnote was added to Table 1-6.	Footnote added.	Addressed	

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
26	Regional Board	Table 2-9 and Table 2-12	Part VI.C.5.c, page 66 and Part VI.E.3, pages 148-149	Table 2-9 of the draft EWMP indicates that Peck Road Park Lake nutrients (total nitrogen and total phosphorus) are categorized with the Harbor Toxics TMDL "scheduling class." Note that Peck Road Park Lake drains to Rio Hondo Reach 3 which is subject to the Los Angeles River Nitrogen Compounds and Related Effects TMDL (LA River Nutrients TMDL). The LA River Nutrients TMDL requires compliance as of the effective date of the LA County MS4 Permit. Therefore, revise Table 2-9 to substitute "Harbor Toxics TMDL" with "LA River Nutrients TMDL" (or another Lakes TMDL for nutrients) as the scheduling class for Peck Road Park Lake total Nitrogen and total Phosphorus. Table 2-12 proposes March 23, 2032 as a milestone for the USEPA Peck Road Park Lake Nutrients TMDL. The Group must propose a final deadline that is as short as possible taking into account the time since USEPA established the TMDL and the technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the WLAs. If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements with numeric milestones and dates for final compliance. If any changes are made to the proposed milestones for Peck Road Park Lake Nutrients, revise applicable sections of the EWMP accordingly, including Section 2.5.2.1 and Tables 2-11 and 2-12, among others. See Enclosure 2 for additional comments.	Based on discussions with the Regional Board, the Machado Lake timeline will be used instead of the Harbor Toxics, because the watershed/tributary area is more comparable.	Revisions were made to substitute the Machado Lake TMDL scheduling class except for the case of Sawpit Wash where the reference was left to the Harbor Lakes TMDL. Please correct.	The schedule assigned for Sawpit Wash was revised to use the schedule associated with the Machado Lake TMDLs. These revisions were made in Table 2-8 (previously Table 2-9) and throughout Section 2.5 as necessary.	Okay.

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27	Regional Board	Page 149		Specify how funds will be used most effectively (through the analysis of alternatives and the selection and sequencing of actions needed to address human health and water quality related challenges and non-compliance). This could include alignment with CIPs, IRWMP projects, planned park improvements, etc.	A discussion was added right before Section 6.5.1 explaining that the RH/SGRWQG members will attempt to align the goals of the EWMP with other existing efforts, such as CIPs. Currently there are no planned park improvement projects in the area and IRWMP projects were not identified in this area.	Revision adequate.	Addressed	
28	Regional Board	Page xviii		The EWMP must be revised to include non-structural control measure costs. These costs do not seem to be in included in Section 6 Control Measure Implementation Cost. The EWMP states that: "There is not a significant cost increase associated with non-structural control measure implementation; therefore, costs focus on the regional and distributed BMPs." To the extent that these costs will remain constant from the previous iteration of the permit, provide the expenditures by each Permittee specific to MS4 permit implementation (excluding EWMP and CIMP development).	Based on discussions with the Regional Board, the cost associated with the stormwater program implementation (MCMs/institutional/non-structural BMPs) from previous years has been included with a statement that costs will likely increase. The narrative also explains that the increase in cost is small in relation to the other EWMP costs and is not carried through in the totals.	RTC and revision is satisfactory.	Addressed	
29	Regional Board	Section 3.4.2	Part VI.C.5.b.iv.(4)(e), page 65	Provide a table listing the responsible Permittee for each Regional EWMP Project. (Figure 3-33 only identifies the location of each Regional EWMP Project).	The responsible jurisdiction (where the project is located) has been identified along with the contributing jurisdictions in Table 3-23. The text was revised to clarify that the responsible jurisdiction is not necessarily financially responsible.	Revisions are helpful.	Addressed	
30	Regional Board	Section 5		The EWMP must provide a clear connection between the implementation schedules in Section 5 and the applicable TMDL compliance schedules.	The implementation schedule is based on the TMDL compliance schedule. This is stated in the introduction to this section. This was mentioned throughout document.	This connection must be demonstrated in the EWMP through a table or figure.	A new subsection was added to Section 5 (Section 5.4, Scheduling Summary). This section includes a figure and demonstrates the implementation schedule aligns with the TMDL milestones.	Okay.
31	Regional Board	Section 6.5		Update Table 6-7 to include available funds from Prop 1 for stormwater grants and IRWM projects.	Prop 1 information was added to the table and Attachment AA.	Update was made.	Addressed	

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32	Regional Board	Section 6.5		Identify specific sources of funds that are available or will be pursued for near term (at least through 2017) BMP implementation.	Specific opportunities have been identified in Section 6.5.6 that will be pursued and evaluated in the near term (prior to 2017).	While we appreciate that the section entitled "6.5.6 Future Steps" was improved, the concept that all the ideas in this paragraph are for the next two years was not made clear. Please clarify that the entire paragraph is the focus for the next two years.	A statement was added within this section to clarify the information pertains to the next two years specifically (prior to 2017).	Okay.
33	Regional Board	Page 159	Part VI.C.8, pages 68-70	Section 7 of the EWMP states that, "an addendum or amendment will be required for the EWMP two years after the Regional Board Executive Officer approval and every two years thereafter ..." Revisions can be included in an addendum or amendment, but the entire EWMP must be assessed and revised as necessary every two years as part of the Adaptive Management Process.	This was clarified in the EWMP.	Clarification seems to have been made.	Addressed	
34	Regional Board	Figure 7-1,Page 160	Part VI.C.8, pages 68-70	The steps outlined in Figure 7-1 do not appear to follow a logical sequential order. Reconsider the steps and revise the figure for greater clarity.	Figure was simplified and revised based on Regional Board comments.	Steps now seem simple and clear.	Addressed	
	Regional Board	RAA		Table 2-5 on pages 27-28 of the EWMP did not classify water body-pollutant combinations for all creeks and tributaries of the Los Angeles River and San Gabriel River within the EWMP area, including Little Santa Anita Canyon Creek, Santa Anita Wash, and Little Dalton Wash. The EWMP must either be revised to include water body-pollutant classification for these waterbodies and associated planned/proposed BMPs accordingly, or the Group must provide a commitment to update the water quality characterization as more water quality data become available through the CIMP for these waterbodies.	There are no TMDLs or 303(d) listings for Little Santa Anita Canyon Creek, Santa Anita Wash, or Little Dalton Wash. The EWMP was revised to clarify that waterbodies will be re-characterized as necessary once through the adaptive management process. Narrative was added to Section 2.1.1.			

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
	Regional Board	RAA		The Regional Board adopted the San Gabriel River, Estuary and Tributaries Indicator Bacteria, Resolution No. R15-005 on June 10, 2015. The EWMP should be revised to address bacteria in Big Dalton Wash, which was identified as impaired in the TMDL, including proposed watershed control measures, interim and final milestones and dates for their achievement and reasonable assurance analysis.	The EWMP was revised to include the SGR Bacteria TMDL and identify the need to address bacteria in Big Dalton Wash (see comment and response above).			
	Regional Board	RAA		Section 2.1.1 provides a summary of key findings from receiving water data analysis. There are exceedances in Rio Hondo Reach 3 for Benzo(k)Fluoranthene, Bis(2-Ethylhexyl) Phthalate, Diazinon, Dibenzo(a ,h)Anthracene, Dissolved Oxygen, pH, and Indeno(1,2,3-cd)Pyrene (Table 2-3 on pages 24-25; Appendix D). Revise the EWMP to include these water body-pollutant combinations as Category 3 pollutants, or provide an explanation for each regarding why they are not addressed by the EWMP.	See response to comment above. Based on discussions with the Regional Board, the narrative was revised to discuss how the CIMP data will be used to re-evaluate WBPCs, as the exceedance analysis included in the EWMP is based on data downstream. Revisions to the WBPCs will be made through the Adaptive Management Process.			

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
	Regional Board	RAA		EWMP proposes that Peck Road Park Lake Nitrogen, Phosphorus, Mercury, Organochlorine Pesticides and PCBs TMDLs milestone schedule follow that of the Harbor Toxics TMDL with the rationale that control measures to reduce toxics should also significantly reduce the concentration of nutrients (Section 2.5.2.1 on pages 35-36). The scale of measures to control and reduce nutrients, metals, and toxic pollutant discharged to a lake system are significantly different than those control measures anticipated for the Greater Los Angeles and Long Beach Harbors. Therefore, the selection of an implementation schedule based on the implementation schedule for the Dominguez Channel and Greater Los Angeles and Long Beach Waters Toxic Pollutants TMDL is not supportable. Revise the schedules proposed for Peck Road Park Lake in consideration of the nutrient and toxic pollutants TMDLs for lake systems adopted by the Regional Board such as the Machado Lake TMDLs that have suitable control measures and implementation schedules.	See response to comment above.			

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
	Regional Board	RAA Modeling		In addition to linear bias statistics presented in Tables 4-2, 4-4, 4-8, 4-10, 4-13, provide additional explanation and interpretation of the root mean square and coefficient of correlation statistics in these tables, and any differences in the conclusions that can been drawn regarding the hydrology and water quality calibrations based on the three statistics. In addition, the coefficients of correlation between modeled and observed values as shown in Table 4-8, Table 4-10, Table 4-13 of the EWMP report respectively for copper, lead, zinc, fecal coliform, total nitrogen, and total phosphorus are low values for coefficients of correlation. Provide an explanation for these low values. Further, data needed to improve model calibration for these constituents should be identified along with a commitment to collect the necessary data and refine the model calibration through the adaptive management process.	Additional discussion was added on the calibration metrics and conclusions that can be drawn from the results. The low correlation coefficients and the data needs were also discussed.			
	Regional Board	RAA Modeling		The model results of the baseline critical condition in terms of runoff volume, pollutant concentration, and pollutant loading are provided in Table 4-14, Table 4-15, Table 4-17 and Table 4-18. However, the duration curves or frequency curves of runoff volume, pollutant concentration and pollutant loading for the baseline condition at each analysis region for each pollutant of concern should be presented as well to demonstrate that the model results of baseline condition are based on the 90th percentile critical condition.	Frequency curves for volumes, concentrations, and loads were added to demonstrate that the control measures were designed to address the 90th percentile critical condition. This information was added in Section 4.9.			

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
	Regional Board	RAA Modeling		The estimated allowable loads and required load reductions for the LAR and SGR watershed areas appear to be provided in Table 4-14 and 4-15 to demonstrate that the estimated allowable loads and load reductions are obtained from the 90th percentile critical condition of runoff volume and allowable pollutant concentration. It is recommended that the allowable loads and required load reductions are provided in the same duration curves for baseline condition to demonstrate that the estimated allowable loads and load reductions meet the 90th percentile critical condition.	The frequency curves discussed in the response to the previous comment were used to address this comment. The allowable loads were not plotted on figures with the required load reductions because allowable loads are dependent on various conditions and the figure would not convey the appropriate message. The frequency curves included in Section 4.9 demonstrate that the load reductions meet the 90th percentile critical condition.			
	Regional Board	RAA Modeling		In the report, summary statistics of load reduction and percent reduction for different control measures are provided as shown in Table 4-23 and Table 4-24; however some numbers to arrive at the modeled values of load reduction and percentage are not clearly identifiable. Provide the RAA results for the proposed control measures and potential BMPs to demonstrate the effectiveness of the proposed BMPs that would achieve the required pollutant load reductions and load reduction goals in terms of 1) influent volume, concentration and load; 2) treated volume, concentration and load; and 3) effluent volume, concentration and load through the system of BMPs at the downstream point of BMP systems to demonstrate the effectiveness of the proposed BMPs.	Besides the MCMs, the BMPs proposed for this EWMP are all related to infiltration. The influent and effluent quality will be very similar. Load reduction occurs when water is infiltrated into the ground, preventing the constituents from moving downstream. The narrative above Table 4-23 was clarified to explain the load reductions are related to the volume captured and infiltrated. Any flows greater than the storage capacity are passed through the system at full concentration.			

Comment Number	Commenter	Location	MS4 Permit Provision	Comment	CWE Response to Original Comment	Regional Board Response	Back Check Response	RB Check 4/14/16
	Regional Board			Provide an example validation for a representative waterbody within the Rio Hondo/San Gabriel River Watershed Management Area, or in another EWMP area where the same RAA approach is used, that demonstrates that with all proposed BMPs in place, as determined from the initial analysis of the necessary volume and/or pollutant load reduction, will result in achieving the RWLs.	It is not possible to demonstrate that the RWLs at the mass emission station are met because this is only one portion of the watershed. The treatment methods involve infiltration of the constituents rather than dilution; therefore a 90% load reduction can be achieved without changing concentrations of the constituents in the water. We have provided the results of the analysis that show the required load reductions have been met (Tables 4-23 and 4-24, plus Attachment X). The Regional Board confirmed that the frequency graphics discussed above will satisfy the intent of this comment.			