

Los Angeles Regional Water Quality Control Board

October 05, 2015

Permittees of the Upper Santa Clara River Watershed Management Group¹
(See Distribution List)

REVIEW OF THE UPPER SANTA CLARA RIVER WATERSHED MANAGEMENT GROUP'S DRAFT ENHANCED WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART IV.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees of the Upper Santa Clara River Watershed Management Group:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the draft Enhanced Watershed Management Program (EWMP) submitted on June 25, 2015 by the Upper Santa Clara River Watershed Management Group (Group). This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop an EWMP to implement the requirements of the Los Angeles County MS4 Permit on a watershed scale through customized strategies, control measures, and Best Management Practices (BMPs). Participation in an EWMP is voluntary.

The purpose of an EWMP is for Permittees to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. Additionally, an EWMP comprehensively evaluates opportunities, within the participating Permittees' collective jurisdictional area (within the Watershed Management Area), for collaboration among Permittees and other partners on multi-benefit regional projects that, wherever feasible, retain all non-storm water runoff and all storm water runoff from the 85th percentile, 24-hour storm event for the drainage areas tributary to the projects, while also achieving other benefits including flood control and water supply.

¹ Permittees of the Upper Santa Clara River Watershed Management Group EWMP include the City of Santa Clarita, County of Los Angeles, and Los Angeles County Flood Control District.

If Permittees opt to develop an EWMP, the EWMP must meet all requirements of Part VI.C (Watershed Management Programs) of the LA County MS4 Permit. This in part, requires Permittees to include multi-benefit regional projects to ensure that MS4 discharges achieve compliance with all final WQBELs set forth in Part VI.E and do not cause or contribute to exceedances of receiving water limitations. An EWMP must be approved by the Los Angeles Water Board, or by its Executive Officer on behalf of the Board.

As stated above, on June 25, 2015, the Group submitted a draft Enhanced Watershed Management Program (EWMP) for their entire jurisdiction to the Los Angeles Water Board pursuant to Part VI.C.4.c.iv of the LA County MS4 Permit.

Public Review and Comment

On July 1, 2015, the Board provided public notice and a 61-day period to allow for public review and comment on the draft EWMPs. A separate notice of availability regarding the draft EWMPs was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received two letters that contained comments specific to the Group's draft EWMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper and the other letter was from Construction Industry Coalition on Water Quality (CICWQ). On July 9, 2015, the Board held a workshop at its regularly scheduled Board Meeting on the draft EWMPs. During the review of the draft EWMPs, the Los Angeles Water Board considered those comments applicable to the Group's draft EWMP.

Los Angeles Water Board Review

Concurrent with the public review, the Los Angeles Water Board reviewed the draft EWMP. During its review, staff of the Los Angeles Water Board had a meeting on September 15, 2015, telephone exchanges, and email exchanges with the Group's representatives and consultants to discuss the Board staff's questions, tentative comments and potential revisions to the draft EWMP.

The Los Angeles Water Board has reviewed the draft EWMP and has determined that, for the most part, the draft EWMP includes the elements and analysis required in Part VI.C of the LA County MS4 Permit. However, some revisions to the Group's draft EWMP are necessary. The Los Angeles Water Board's comments on the draft EWMP, including detailed information concerning revisions to the RAA, are found in Enclosure 1 and Enclosure 2, respectively. The LA County MS4 Permit includes a process through which necessary revisions to the draft EWMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final EWMP, revised to address Los Angeles Water Board comments identified in the enclosures, must be submitted to the Los Angeles Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revision to the draft EWMP as identified in the enclosures to this letter and submit the revised EWMP as soon as possible and no later than **January 04, 2015**.

October 05, 2015

The revised EWMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Upper Santa Clara River EWMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Erum.Razzak@waterboards.ca.gov.

If the necessary revisions are not made and the Group does not ultimately receive approval of its EWMP within 40 months of the effective date of the LA County MS4 Permit, the Group will be subject to the baseline requirements in Part VI.D and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment L pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

Until the draft EWMP is approved, the Group is required to:

- (a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv).
- (b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii);
- (c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters; and
- (d) Where possible, implement watershed control measures, from existing TMDL implementation plans, to ensure that MS4 discharges achieve compliance with interim and final trash WQBELs and all other final WQBELs and receiving water limitations pursuant to Part VI.E and set forth in Attachments L through R by the applicable compliance deadlines occurring prior to approval of an EWMP.

If you have any questions, please contact Ms. Erum Razzak of the Storm Water Permitting Unit by electronic mail at Erum.Razzak@waterboards.ca.gov or by phone at (213) 620-2095. Alternatively, you may also contact Mr. Ivar Ridgeway, Storm Water Permitting, at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures: Enclosure 1 – Comments and Necessary Revisions to Draft EWMP
Enclosure 2 – Comments on the Reasonable Assurance Analysis
Upper Santa Clara River Watershed Management Group Distribution List

Los Angeles Regional Water Quality Control Board

Enclosure 1 – Summary of Comments and Necessary Revisions to Draft EWMP

Upper Santa Clara River Watershed EWMP Group

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
General		
Section 7.3	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>The final due date for limiting pollutants including bacteria (dry – 2023, and wet – 2029) are well defined in Section 7.3 “Scheduling of Control Measures and EWMP Milestones”. However, a final milestone of 2035, which is after the 2029 bacteria TMDL compliance milestone, is proposed with little clarification on why the 2035 deadline is included. The language on page 7-14 stating that, “A final deadline of 2035 is included for any additional control measures needed to address metals after the controls to address bacteria and other constituents are implemented. This final date was determined to be as soon as possible given the additional structural control measures that may need to be implemented” is not sufficient. Please include more information to support the proposed final milestone of 2035 (e.g., economic/ technological justification, specific set of BMPs proposed to address metals, etc.) and to provide clarity regarding the scope of the deadline (i.e., for the South Fork subwatershed to achieve metals RWLs). Additionally, the deadline of 2035 to address effectively prohibited non-stormwater flows is not adequately justified (page 7-14). Alternatively, without additional justification, the final milestone to address all water quality priorities should be set at 2029 to match the final compliance date for bacteria and the Group can propose additional time if needed during the adaptive management process.</p>
Water Body Pollutant Classification		
Section 3.1		<p>For clarity, include a description of the Santa Clara River reaches, tributaries and lakes within the EWMP area, and label these on Figure 1 or include a separate figure that shows these waterbodies relative to the EWMP boundary.</p>
Table 3-2	Part VI.C.5.a.ii.(1) (page 60)	<p>Revise Table 3-2 of the draft EWMP to address the following comments:</p> <ul style="list-style-type: none"> • Add a footnote to Reach 4B in the list of waterbodies for the Bacteria TMDL to indicate that this reach is located in Ventura County, but considered for the purposes of understanding downstream water quality. • Revise footnote 4 and 5 to specify that the exceedance days apply to daily sampling.

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<ul style="list-style-type: none"> Also include interim and final WQBELs for bacteria, based on weekly sampling, as listed in the LA County MS4 Permit, Attachment L Part D.3.a-b (page L-2).
Table 4-4, 4-5 & Appendix A1 Table A1-13		Reach 4B is outside the jurisdictional boundary of the Group and falls in Ventura County. Please clarify in a footnote for Reach 4B in Table 4-4 and 4-5, and Appendix A1 Table A1-13 of the draft EWMP that Reach 4B is located in Ventura County but was considered for the purposes of understanding downstream water quality.
Table 4-4	Part VI.C.5.a.ii.(1) (page 60)	Revise Table 4-4 and Appendix A1 Table A1-13 of the draft EWMP as follows: <ul style="list-style-type: none"> For Category 1 pollutants, Reach 7, omit chloride, ammonia, nitrate, and nitrite. For Category 1 pollutants, Reach 6, omit ammonia, nitrate, and nitrite.
Appendix A1 Table A1-6	Part VI.C.5.a.ii.(1) (page 60)	Revise Appendix A1 Table A1-6 of the draft EWMP as follows: <ul style="list-style-type: none"> For Reach 6, omit ammonia, nitrite, and nitrate. For Reach 7, omit chloride.
Source Assessment		
Appendix A1 Section A1-4.3 & Figure A1-8	Part VI.C.5.a.iii.(1). (b) (page 61)	Appendix A1 Section A1-4.3 of the draft EWMP states that a "major outfall is defined in Attachment A to the Permit as an outfall that discharges from a pipe with an inside diameter of 36 inches or more." In addition to the aforementioned definition, Attachment A of the LA County MS4 Permit also states that for MS4s that receive stormwater from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), a major outfall is an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 2 acres or more). (40 CFR § 122.26(b)(5)) Please revise Appendix A1 Section A1-4.3 to include the aforementioned definition and include any additional applicable major outfalls to Appendix A1 Figure A1-8.
Section 4.2.2	Part VI.C.5.a.iii.(1). (a).(vii) (page 61)	Section 4.2.2 of the draft EWMP notes that stormwater and non-stormwater discharges have not been well characterized within the watershed and therefore no outfall data were available for water quality characterization. While outside of the EWMP area in LA County, there are MS4 outfall monitoring sites at various locations within the Santa Clara River Watershed, which are monitored under the Ventura County MS4 Permit. The Group should evaluate these data and include them, if reasonably representative of the EWMP area.
Prioritization		
Table ES-1, 4-6, & Appendix A1 Table A1-14	Part VI.C.5.a.iv (page 61-62)	Section 4.5 of the draft EWMP states that "[c]ategories without recent exceedances and WBPCs located in areas where MS4s are not a source contributing to the exceedances (categories 1D, 1E,

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p><i>2C, 2D, 3C) are not considered to be priorities for the EWMP.</i>"</p> <p>However, the draft EWMP also notes in Section 4.2.2 that stormwater and non-stormwater discharges have not been well characterized within the watershed and therefore, no outfall data were available for water quality characterization. Hence, all category 1 and 2 pollutants should be a priority 1 or 2 pollutant. During the adaptive management process, WBPCs can be re-prioritized based on outfall data obtained from the CIMP. Therefore, please revise the draft EWMP to address the following comments on Table ES-1, 4-6, and Appendix A1 Table A1-14:</p> <ul style="list-style-type: none"> • Add nitrogen compounds for SCR Reach 5 as Priority 1. • Correct typographical error to omit superscript "(1)". • Substitute "F" with "X". • Make necessary changes to reflect that the Chloride TMDL only applies to Reaches 5 & 6 and not Reach 7. • Lake Elizabeth Trash TMDL is missing. • Please clarify in a footnote that Reach 4B is in Ventura County but was considered for the purposes of understanding the downstream water quality. • Reach 5, priority 2: Only iron is on the current 303(d) list. Therefore, please clarify in a footnote the basis for including copper, mercury, and TDS as priority 2. • Reach 6, priority 2: Only copper and iron are on the current 303(d) list. Therefore, please indicate in a footnote the basis for including mercury, zinc, selenium, and cyanide as category/priority 2. (It appears that, for cyanide, there are sufficient exceedances for potential 303(d) listing per Table A1-9, but this is not true for the other pollutants.) • Reach 6, priority 2: Add Chlorpyrifos, diazinon, and toxicity for consistency with Table A1-8. • Reach 7, priority 2: Please indicate in a footnote the basis for including copper, mercury, and cyanide in priority 2. <p>For additional guidance, please refer to Attachment L of the LA County MS4 Permit. Also note that Santa Clara River reach numbering has changed since the numbering in the 2002 303(d) list where Reach 7 became Reach 5, Reach 8 became Reach 6, and Reach 9 became Reach 7. Attachment L of the LA County MS4 Permit accounts for this (see Attachment L footnote 1).</p>
Minimum Control Measures and Non-Stormwater Discharge Measures		
Table 5-1	Part VI.C.5.b.iv.(1). (a).(v) (page 63)	Indicate which pollutants and pollutant sources will be targeted under the Group's Public Information and Participation Program.
Table 5-1	Part	In Table 5-1 of the draft EWMP under Industrial/Commercial

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
	VI.C.5.b.iv.(1). (a).(ii) (page 63)	Facilities, one of the proposed modifications is as follows: <i>“Inspection frequencies will be modified based on potential for facility to be a source of pollutants identified as water quality priorities.”</i> Please clarify how the inspection frequencies will change (e.g., what is the frequency for facilities with a potential to be a source of pollutants identified as water quality priorities versus other facilities which are least likely to be potential sources of pollutants identified as water quality priorities). Also clarify how the determination is made on what facilities will be targeted.
Section 5.3	Part VI.C.5.b.ii.(1) (page 62)	For specificity, please state in Section 5.3 of the draft EWMP that institutional control measures proposed for non-stormwater discharges meet the requirements for these measures as set forth in Part III.A of the LA County MS4 Permit.
Appendix B2	Part VI.C.5.b.iv.(1). (a).(i) (page 63)	<p>Table 5-1 of the draft EWMP states that <i>“prioritized inspection process will be developed based on the potential for site to be a source of pollutants identified as water quality priorities.”</i> Therefore, Appendix B2 under the Development Construction section, row 2 and 3 and applicable columns for “Water Quality Priority Pollutants” should indicate (e.g. with an “X”) that facilities that are potential sources of water quality priorities identified in the draft EWMP (category 1, 2, and 3 pollutants) will be inspected.</p> <p>Additionally, the table in Appendix B2 under row “Development Construction” and column “Water Quality Priority Pollutants” does not seem to be consistent with Appendix C8. Please ensure that the tables Appendix B2 and Appendix C8 of the EWMP are consistent.</p> <p>Table 5-2 of the draft EWMP states that the SOPs/inspection checklist will be developed/modified <i>“to explicitly address watershed priorities and associated sources”</i>. Therefore, Appendix B2 under Development Construction, row titled “Develop/implement SOPs/inspection checklist” should indicate (e.g. with an “X”) the water quality priorities identified in the draft EWMP (category 1, 2, and 3 pollutants).</p>
Selection of Watershed Control Measures		
Executive Summary		The Executive Summary identifies two overarching categories of BMPs in the EWMP, and describes Structural BMPs as those that divert or treat stormwater and non-stormwater. Please clarify that these Structural BMPs may retain , divert or treat stormwater and non-stormwater. Align with Section 5.1 of draft EWMP.
Tables 6-4 & 7-5, Appendix D1 Tables D1-1 to D1-14		Provide clarification on the relationship between the Exceedance Volumes in Table 6-4 and the Control Measure Capacities in Table 7-5 and Appendix D1 Tables D1-1 to D1-14.

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
Section 7.3.1 & Table 7-5	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>Section 7.3.1 and Table 7-5 of the draft EWMP specify that MCMs from the LA County Permit, Enhanced MCMs, non-stormwater control measures, and full capture devices for Lake Elizabeth (by 2016) will be implemented during the current permit cycle by the 2017 milestone. The residential LID program will also begin in 2017. Please address the following comments:</p> <ul style="list-style-type: none"> • Please include interim milestones for enhanced MCMs. • Please include, in Section 7.3.1 of the draft EWMP, interim milestones within this permit term for planning and design steps for structural projects to be completed in the next permit term. • For the Lake Elizabeth Trash TMDL, please state if interim deadlines/WQBELs (March 6 in 2012, 2013, 2014, and 2015) were met. If interim milestones were not met, please provide the status on the installation of full capture devices.
Enhanced Watershed Management Program Provisions		
Section 8	Part VI.C.1.g.ix (page 50)	Please update Section 8 of the draft EWMP to include any additional sources of funding that were secured for any proposed BMPs (if any are secured prior to the submittal of the revised EWMP).
Table ES-2 & 8-1	Part VI.C.1.g.ix (page 50)	<p>For clarity on how to read and interpret Table ES-1 and Table 8-1 of the draft EWMP, please address the following comments by adding footnotes to the table:</p> <ul style="list-style-type: none"> • Explain how the bolded numbers are cumulative costs by giving an example (e.g., for City of Santa Clarita, Residential column: \$1.3M + 0.9M = \$2.2 (2022); \$2.2M + 3.1M = \$5.3M (2029); \$5.3M + \$0 = \$5.3M (2035)). • Specify that the bolded numbers in the row for 2035 are added to get the total cost per jurisdiction. • Specify that numbers in the last row are sums of the bolded numbers in each column. • Clarify that \$623.7M is the total cost.
Appendix C5 Table C5-2	Part VI.C. 4.b.iii.(5), page 56	Appendix C5 Table C5-2 of the draft EWMP gives a completion date of 7/1/15 for trash removal BMPs. Move these BMPs to Table C5-1 as they will be Existing Distributed BMPs upon submission of the revised EWMP. The Group may indicate in the "Comments and Notes" field of Table C5-1 that these BMPs were the Group's Early Action project per the permit provision, Part VI.C.4.b.iii(5).
Reasonable Assurance Analysis (RAA)		
Executive Summary		For clarity, revise the discussion on page ES-4 to state that the purpose of the RAA is to demonstrate that the selected WCMs will result in compliance with applicable water quality-based effluent limitations and receiving water limitations in Parts V.A and VI.E and Attachment L of the permit.

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>Please note that if land uses in the portion of the City of Santa Clarita within the Los Angeles River watershed change in the future, including the construction of any MS4 infrastructure, the EWMP must be modified to address MS4 discharges from this area to the LA River, including but not limited to requirements pertaining to MS4 discharges in Attachment O of the LA County MS4 Permit.</p>
Table 6-3	Attachment L Part D (page L-2 to L-3)	<p>Table 6-3, footnote 1, states that “dry weather target based on 30-day geometric mean WQO while wet weather target is based on single sample maximum WQO.” Due to the challenges inherent in conducting a RAA under dry weather conditions and for non-stormwater discharges, the simulation of a 30-day critical dry period is an acceptable approach for the dry weather RAA. However, the RAA must acknowledge that Attachment L of the permit includes water quality based effluent limitations and receiving water limitations, applicable in dry weather, that are based on a single sample maximum threshold, as well as the geometric mean limitation.</p>
Table 6-3	Attachment L Part A.2 (page L-1)	<p>For Table 6-3 of the draft EWMP, a footnote should be added to nutrients to acknowledge the existing TMDL indicating a 1-hr average and a 30-day average effluent limitation for ammonia and a 30-day average effluent limitation for nitrite+nitrate.</p>
Table 6-6	Part VI.C.5.b.iv.(5) (page 65)	<p>Table 6-6 of the draft EWMP specifies a runoff volume retention approach for E. coli and non-metals water quality priorities. Please explicitly indicate which non-metals water quality priorities are addressed. Specifically, indicate each category 1 (nitrogen compounds, salts) and category 2 and 3 pollutant that will be addressed by the bacteria control measures. If a non-metal pollutant is not addressed by the bacteria control measures, provide justification for why it does not need to be addressed. For example, if data indicate that MS4 discharges are achieving WQBELs and Receiving Water Limitations for nitrogen compounds and salts, include this finding and support for it in the EWMP.</p>
Section 6 & Appendix C	Part VI.C.5.b.iv.(5) (page 65)	<p>See additional comments in Enclosure 2.</p>

Los Angeles Regional Water Quality Control Board

Enclosure 2 – Summary of Comments and Necessary Revisions for the Reasonable Assurance Analysis (RAA)

Upper Santa Clara River Watershed Enhanced Watershed Management Program (EWMP)

Prepared by: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen

This memorandum contains the comments on Section 6, Reasonable Assurance Analysis (RAA) of the draft Enhanced Watershed Management Program (EWMP) or the Upper Santa Clara River Watershed dated June 2015.

1. The EWMP separately defines critical conditions for the two limiting pollutants, bacteria and zinc. For zinc and other metals, the critical condition is defined as the 90th percentile Exceedance Volume (EV) as explained in Section 6.2.3.1. 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 (zinc) load to account for conditions in which flow may be high but concentration may not exceed the RWL.
2. Please provide the model results for the baseline condition in terms of runoff volume, pollutant concentration and pollutant loading, as well as the estimated allowable loads and required load reductions, based on the 90th percentile critical condition of runoff volume and pollutant concentration, for each modeled subbasin for each pollutant modeled.
3. In the report, a summary statistic of percent reduction is provided, however some numbers to arrive at calculating the percentage are missing. Per the RAA Guidelines, the model results for the proposed control measures and potential BMPs should be provided to demonstrate the effectiveness of the proposed BMPs that would achieve the required reductions as described in Sections 6 and presented in Table 6-6. As such, the detailed reasonable assurance analysis (RAA) for the proposed BMPs specifically for analysis regions South Fork SCR, SCR at County Line, Bouquet Creek, Mint Canyon and Castaic Creek in terms of influent volume and concentration, treated volume and concentration, and effluent volume and concentration through BMPs should be provided in the EWMP report to demonstrate the BMP effectiveness as indicated in Table C4-7 and Table C8-1 and C8-2 and the compliance with final water quality limits.
4. Finally, please provide an example validation for a representative waterbody within the USCR or in another EWMP area 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.

Upper Santa Clara River EWMP Group

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