

## Los Angeles Regional Water Quality Control Board

October 26, 2015

Permittees of the Santa Monica Bay Jurisdictional Group 2 and 3<sup>1</sup>  
(See Distribution List)

### **REVIEW OF THE SANTA MONICA BAY JURISDICTIONAL GROUP 2 AND 3 DRAFT ENHANCED WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.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 Santa Monica Bay Jurisdictional Group 2 and 3:

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 Santa Monica Bay Jurisdictional Groups 2 and 3. 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.

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<sup>1</sup> Permittees of the Santa Monica Bay Jurisdictional Group 2 and 3 EWMP include the City of Los Angeles, the County of Los Angeles, the Los Angeles County Flood Control District, the City of Santa Monica and the City of El Segundo.

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 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 comment letters that were applicable 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.

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 26, 2016**.

The revised EWMP must be submitted to [losangeles@waterboards.ca.gov](mailto:losangeles@waterboards.ca.gov) with the subject line "LA County MS4 Permit – Revised Santa Monica Bay Jurisdictional Groups 2 and 3 EWMP" with a copy to:

[Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) and [Deborah.Brandes@waterboards.ca.gov](mailto:Deborah.Brandes@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 Mrs. Deborah Brandes of the Storm Water Permitting Unit by electronic mail at [Deborah.Brandes@waterboards.ca.gov](mailto:Deborah.Brandes@waterboards.ca.gov) or by phone at (213) 620-6688. Alternatively, you may also contact Mr. Ivar Ridgeway, Storm Water Permitting, at [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,

  
Samuel Unger, P.E.  
Executive Officer

Enclosures: Santa Monica Bay Jurisdictional Groups 2 and 3 Distribution List  
Enclosure 1 – Comments and Necessary Revisions to Draft EWMP  
Enclosure 2 – Comments on the Reasonable Assurance Analysis

Los Angeles Regional Water Quality Control Board

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

Santa Monica Bay Jurisdictional Groups 2 & 3

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
<b>General</b>		
EWMP, page 12		Correct omission of REC-1 and REC-2 designations in Table 2-1 Beneficial Uses of Water Bodies and Coastal Features Designed [sic] in the Basin Plan for Santa Monica Bay – Nearshore Zone, which should have been assigned “E” for the REC-1 and REC-2 beneficial uses.
EWMP, page 54		On Figures 4-12 to 4-14 (EWMP, pages 54-56) there are two colors of blue in the key and it is hard to differentiate in the figure which of the two blues is being used and if there is an overlap of colors. Revise maps for clarity. Also, storm drain/line labels on some maps are hard to read due to the font size & color. Please check other figures for legibility as well.
Appendix G		Proofread and correct grammatical and punctuation errors in Appendix G.
EWMP, page 68		Correct the header on pages 69-76. It says “EWMP Implementation Costs and Financial Strategy,” but that section is Section 7, which begins on page 77.
EWMP, page 73		Under Section 5.5, for clarity, create a sub-header for compliance with the debris TMDL and one for the SMB TMDL for DDTs and PCBs.
EWMP, All Appendices		Put appendix letter in either footer or header so it is easier to find the appendix the reader needs. It is very difficult to navigate as is. In addition (if possible) please put in page numbers within each Appendix (e.g. for Appendix A, A-1, A-2, etc.) so that pages can be referenced in the review process.
EWMP, Appendix A, page 31 and other pages with similar maps		The drainage area of RBMP23 2-2 Parking Lot is very hard to distinguish (Figure 7, Appendix A, page 31). Check all maps with this same color coding for legibility (i.e., a light orange).
EWMP, Appendix A, section 4.3, page 59		Regarding debris, the XXX should be replaced with actual numbers of catch basins.
EWMP, page 7	NA	Regarding page 7 of the EWMP, the first and second paragraph discuss the compliance deadlines associated with the Trash and Bacteria TMDLs. Reference or provide these dates and specify whether the dry weather bacteria TMDL compliance dates are for

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		summer or winter. Table 2-3 should also be referenced for completeness. In addition, eliminate redundancy in paragraphs 1 and 2 regarding the discussion of final compliance. Additionally, correct the title of Table 1-3.
EWMP, Table ES-5, page xvi; EWMP, Table 2-3, page 13; and EWMP, Appendix A, Table 1	NA	In Table ES-5 (EWMP, page xvi), Table 2-3 (EWMP, page 13) and Table 1 in Appendix A correct the Winter dry weather bacteria final compliance date to read November 1, 2009 and not July 15, 2009. (Final Basin Plan Amendment Santa Monica Bay Beaches Bacteria of Resolution R12-007 (page 8)). Also, correct footnote 2 in each and the discussion on page xiii; the TMDL revisions became effective on July 2, 2014.
<b>Water Quality Characterization</b>		
EWMP, pages 14-16	Part VI.C.5.a.i.	The EWMP provides some information on the sources of bacteria, PCBs & DDTs, and lead, and the relative contribution of these sources, but the EWMP does not provide any numeric information in terms of loading or concentration data. Where data or studies are cited and contain loading or concentration data, a summary of the data must be provided.
EWMP, Figure 2-1, page 11	Part VI.C.5.a.iii.(1)(b)	More clearly delineate the boundaries of J2/J3 in Figure 2-1 Receiving Waters in the SMB EWMP Group Area). A dark black outline around the borders of the J2/J3 boundaries would be helpful.
<b>Water Body Pollutant Classification</b>		
EWMP, pages 10-16	Part VI.C.5.a.ii.	It is not clear from the EWMP what analysis was conducted to identify potential Category 3 pollutants (those which are not 303(d)-listed, but which exceed applicable receiving water limitations contained in the Permit and for which MS4 discharges may be causing or contributing to the exceedance). Explain what process/analysis was used to reach the conclusion that there were no pollutants to be placed in category 3.
<b>Source Assessment</b>		
EWMP, page 16	Part VI.C.5.a.iii.(1)(a)(v)	<p><u>DDT and PCB</u></p> <p>The EWMP states:                      “With respect to stormwater, the TMDL does not specifically characterize MS4 loadings, though it does recognize that “DDT and PCBs are no longer detected in routine stormwater sampling from Ballona Creek or Malibu Creek.” However, the TMDL also states that current detection limits<sup>1</sup> used to analyze DDT and PCB concentrations are too high to appropriately assess the water quality. Stormwater inputs are assumed to come from urban areas, as the TMDL specifically states that rural areas in NSMBCW are not likely to be a major source of PCBs or DDT (USEPA, 2012).”</p>

<sup>1</sup> Current detection limits refers to detection limits at the time the TMDL was written. Since that time, new methods are able to detect much lower levels of DDT and PCBs.

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>Provide justification why DDT and PCB do not need to be addressed based on USEPA's Santa Monica Bay Total Maximum Daily Loads for DDTs and PCBs (Pages 32-34 and 37).</p> <p>Data that must be considered from the USEPA TMDL are:</p> <ol style="list-style-type: none"> <li>1. Sampling data at MS4 monitoring sites located at Ballona Creek (since 1994) and Malibu Creek (since 1997).</li> <li>2. DDT and PCB loading data from the early 70s through around 2006. Report the average concentrations estimated by Curren et al. (2010) - 6.2 g for DDT and 32.9 g for PCBs. (Both of these estimates are for Ballona Creek only, which is adjacent to SMB J2/J3).</li> <li>3. Use the estimated loads of DDT and PCBs from all urban areas to Santa Monica Bay calculated by USEPA's DDT/PCB TMDL for Santa Monica Bay (28 g/yr for DDT and 145 g/yr for PCBs) as a guide in developing the appropriate loads to the J2/J3 area.</li> <li>4. Sediment data from the, the City of LA presented in Table 4-3 (page 34 of the SMB DDT and PCBs TMDL). (in conjunction with the method outlined in #5 above) to estimate the PCB and DDT average loads to J2/J3.</li> </ol> <p>(#1-4 above came from the Santa Monica Bay Total Maximum Daily Loads for DDTs and PCBs, pages 32-34)</p> <p>Because of the conclusion in the USEPA SMB TMDL for DDTs and PCBs, as indicated above, the EWMP group must collect data under its CIMP to assess contributions of DDTs and PCBs from the J2 &amp; 3 EWMP area to Santa Monica Bay, and re-evaluate the categorization and prioritization of DDTs and PCBs on the basis of the CIMP data. See also comments on RAA regarding DDTs and PCBs, below.</p>
EWMP, page 16	Part VI.C.5.a.iii.(1)(a)(v)	<p>Lead must continue to be monitored under the CIMP to assess whether it is meeting WQBELs. While lead is a Category 2 pollutant in Santa Monica Canyon Channel and it was determined through an RAA calculation to require a TLR of 0, it is a metal that is characteristically derived from urban watersheds.</p> <p>Reference the TMDL for Metals in Ballona Creek and the following findings which may be applicable to the SMB J2&amp;J3 EWMP area:</p> <ol style="list-style-type: none"> <li>1. During wet weather, runoff from industrial sites has the potential to contribute metals loadings to the creek. This finding is supported by Stenstrom et al. in their final report on the industrial storm water monitoring program under the existing general permit. The report found that the mean value for lead was 2960 ug/L (Stenstrom et al.,</li> </ol>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		2005). 2. The most prevalent metals in urban stormwater are consistently associated with suspended solids (Sansalone and Buchberger 1997, Davis et al. 2001). These metals are typically associated with fine particles in storm water runoff (Characklis and Wiesner 1997, Liebens 2001), and have the potential to accumulate in estuarine sediment posing a risk of toxicity (Williamson and Morrissey (2000)). 3. During 1991-1996 92% of lead annual watershed loads came from wet-weather runoff. (Ballona Creek Metals TMDL, pages 27-28)
NA	Part VI.C.5.a.iii.(1)(a)(vii)	Include all available data and conclusions on DDTs or PCBs from Permittee(s)' monitoring programs.
<b>Selection of Watershed Control Measures</b>		
EWMP, page 30	Part VI.C.5.b	Clarify the relationship between Section 4.1 and Appendix F, Section 6 and reference Appendix F, Section 6 as appropriate in the main body of the EWMP. In addition, clarify whether the bulleted items on pages 33-34 of Appendix F of the EWMP are meant to summarize the MCMs required <i>until the EWMP is approved</i> (2001 MCMs) or the MCMs required <i>after the EWMP is approved</i> (2012 MCMs). If the former, add a parallel bulleted list that summarizes the additional MCM elements that will be implemented after EWMP approval.
EWMP, page 39	Part VI.C.5.b.iv.(4)(a), page 64	A total of 36 regional/centralized BMPs required for compliance were outlined in Table 4-6.  Of the 36 projects, it appears that 17 were mentioned in the SMB Bacteria TMDL Implementation Plan, while 10 do not appear in the Plan and it is uncertain whether 9 appear in the plan or not. Indicate which of the projects were derived from the SMB Bacterial TMDL Implementation Plan and which are newly identified projects.
Various	Part VI.C.5.b.iv.(4)(e)	Ensure that the plan clearly identifies the responsibilities of each participating permittee for each watershed control measure, including non-structural BMPs (e.g., programmatic, institutional, source control, etc.).
EWMP, Appendix A, page 17	Part VI.C.5.b.iv.(5)(c)	Show work for deriving the modeled 90th percentile daily concentration of 21 µg/L for lead.
<b>Adaptive Management Provisions</b>		
Section 6		Itemize specific analyses that will be reevaluated as data become available and during adaptive management, which may include but

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		are not limited to: water quality calibration; PCB baseline loading and target load reductions; and Pb baseline loading and target load reductions in Santa Monica Canyon.
<b>Enhanced Watershed Management Program Provisions</b>		
Section 4.2.4		Provide a description/itemization of the anticipated multiple benefits of each of the eight regional BMPs.
EWMP, page 20, EWMP, Appendix A, page 4	Part VI.C. 1.g.iv, page 49	As the RAA approach for dry weather relies on a demonstration of certain conditions at CMLs and their drainage areas, such as “there are no MS4 outfalls owned by the SMB EWMP Group agencies within the CML’s drainage area” and “there are no non-stormwater MS4 outfall discharges within the CML’s drainage area,” substantiate these findings for each CML with a map of the drainage areas associated with each CML that includes all MS4 outfalls (major and minor) and observations conducted at CMLs and MS4 outfalls.
EWMP, page 20	Part VI.C. 1.g.iv, page 49	Ensure that the CMLs subject to the antidegradation provisions per the SMB Beaches Bacteria TMDL (Resolution No. R12-007) are clearly identified in the EWMP.
EWMP, Appendix F, page 29	Part VI.C. 1.g.vi, page 50	Table 5-1 - Regional Project Evaluation Criteria, in a memo entitled “Existing and Potential Control Measures Technical Memorandum” provides different criteria for consideration in evaluating the Regional projects to propose. Criteria include: cost effectiveness (capital cost, funding options), stormwater capture goals (water quality, volume of water captured), environmental, public policy institutional issues (political constraints, partnerships), land ownership (public vs. private), ease of implementation (permitting, constructability). Provide ranking of potential regional projects, including those proposed in the EWMP and others that were evaluated but not selected for inclusion in the EWMP, if any, per these evaluation criteria.
NA	Part VI.C.1.g.viii, page 50	Provide a clear discussion of how the program ensures that existing requirements to comply with technology based effluent limitations and core requirements (e.g., prohibiting non-stormwater discharges of pollutants through the MS4 and controls to reduce the discharge of pollutants in stormwater to the MEP) are not delayed.
EWMP, pages 79-80	Part VI.C.1.g.ix, page 50	Document existing sources of funding more precisely at the Permittee level (see Table 7-4). Include data/information for El Segundo, which is currently missing from Table 7-4. In addition, clarify the column “Existing Utility” in Table 7-4.
EWMP Section 7.1		Provide documentation on how centralized and distributed projects will be integrated into, or aligned with, existing CIPs for each Permittee. Indicate whether this alignment could off-set capital costs (such as for green streets) and, if so, by how much.

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
EWMP Section 7.4.4		Provide a timeframe(s) for developing a more detailed financial plan to implement the EWMP.
EWMP, Table 4-6	Part VI.C. 4.b.iii.(5), page 56	Clarify the completion date for RBMP10_PenmarPh2 and define the "*" associated with this project in Table 4-6.
EWMP page 6	NA	In Table 1-2 303(d) – Listed Water Bodies in the SMB Watershed (EWMP, page 6) it says the pollutant "debris" in Santa Monica Bay Offshore/Nearshore is addressed by the "Trash TMDL". Revise the last column "Notes" for accuracy to state that it is addressed by the "Debris TMDL."
<b>Reasonable Assurance Analysis (RAA)</b>		
Executive Summary	Part VI.C.5.b.iv.(5) (page 65)	<p>The draft EWMP, in Section 5.5, states the following: <i>"Therefore, consistent with the TMDL, it is assumed that there is a zero load reduction required for PCBs and DDTs in MS4 discharges, and reasonable assurance is demonstrated."</i></p> <p>However, the SMB DDTs/PCBs TMDL on page 49 states the following: <i>"The estimates of total suspended solids (TSS) are based on LSPC model outputs for the years 2000 to 2010 based on Ackerman and Schiff (2003). Using this method the theoretical maximum allowable stormwater loads would be 506 g/yr for DDT and 154 g/yr for PCBs (Table 6-3). However, estimates of current stormwater loads are much lower. Estimates based on the median value from Curren et al. (2011) extrapolated to the other watersheds based on percent urban area were 28 g/yr for DDT and 145 g/yr for PCBs. The highest loadings were from Ballona Creek, Hermosa Beach and Santa Monica Canyon watersheds. These three watersheds are highly urbanized and combined they represent 94% of the developed area draining to Santa Monica Bay. With the exception of PCBs from these three watersheds, all other estimates of current loading are lower than the allowable loadings."</i></p> <p>For PCBs, an RAA must be conducted to estimate the pollutant load reduction for PCBs. Using TSS as a surrogate pollutant for PCBs is an acceptable approach for the purposes of conducting an RAA. Note that the WLA for PCBs (140.25 g/yr) applies to the entire Santa Monica Bay Watershed. The Group is subject to a proportional percentage of the WLA relative to the percent area within the watersheds draining to Santa Monica Bay. If a pollutant load reduction is required for PCBs, additional BMPs must be proposed to address it. Revise relevant tables and text as applicable.</p> <p>The Group must also, during the adaptive management process, commit to re-evaluating DDT and PCB loadings using data from the</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		CIMP (from receiving water and/or outfall monitoring sites) and subsequently conducting an RAA with the available data.
Appendix F, Section 5		Include full citation for Thoe et al. 2015 in Reference section, or correct date of publication. Citation on page 4 of Appendix F does not match citation in Reference section.
Appendix F, Figure 1		Clarify distinction between S-2-15 and SMB-2-15 and W-2-01 and SMB-2-01 analysis regions.
Appendix F, Table 15, footnote **		Fill in dates of observations in table note "***".
Appendix F, Table C-4		Correct title of table.

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Los Angeles Regional Water Quality Control Board

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

**Santa Monica Bay Jurisdictional Group 2 and 3  
Enhanced Watershed Management Program (EWMP)**

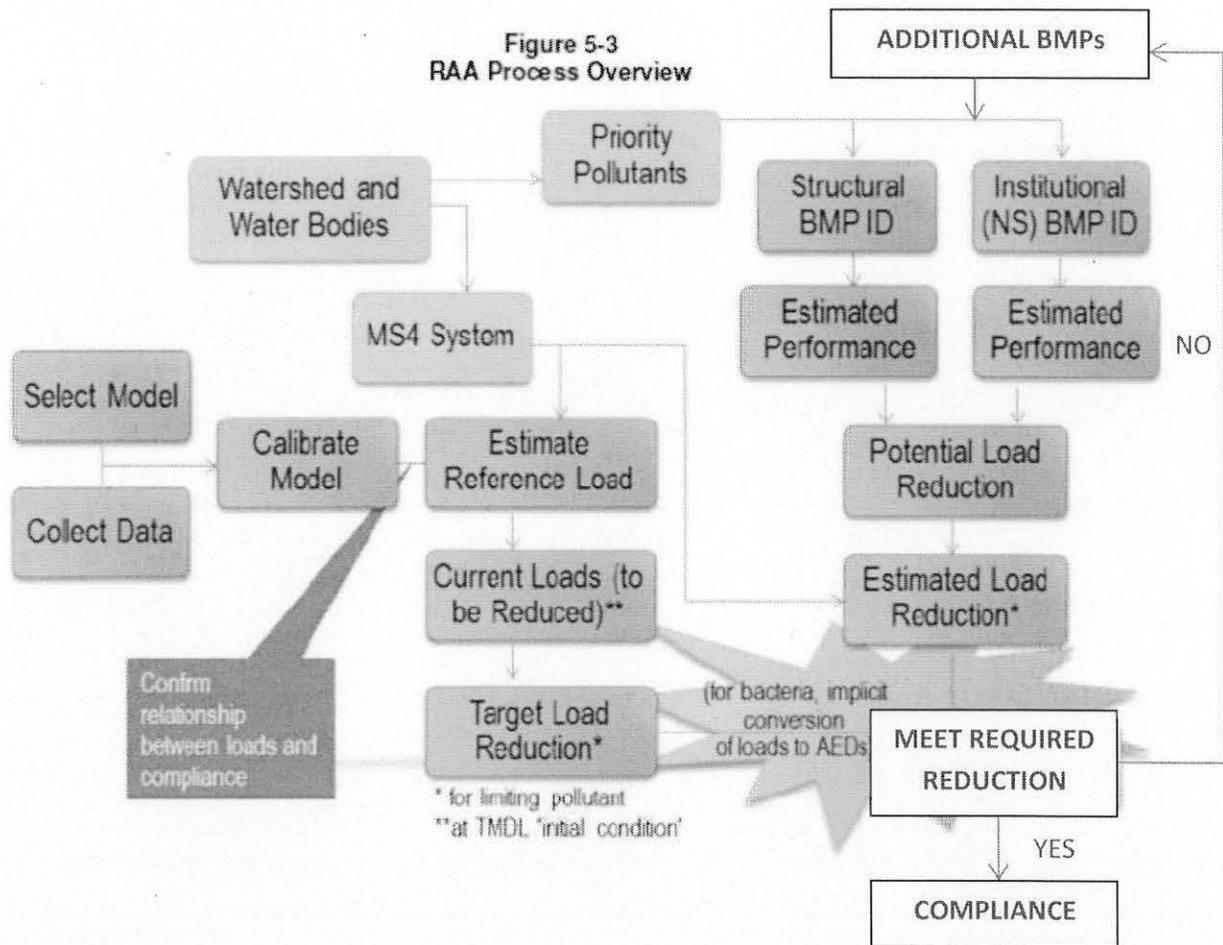
Prepared by: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen

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This memorandum contains the comments on Section 3, Reasonable Assurance Analysis (RAA) in the draft Enhanced Watershed Management Program (EWMP) for Santa Monica Bay Jurisdictional Group 2 and 3 dated June 29, 2015.

General comments on the Section 3, RAA:

1. Section 3.1 Modeling System to be used for RAA and BMP Selection
  - In Section 3.1 of the main body of the EWMP, provide reference to Appendix A, section 2.3.3, including Tables 3 and 4 and Figure 4, which describes the analysis conducted to select the critical condition for the RAA.
  - Model simulation integrates Monte Carlo methods that rely on repeated random sampling to calculate a distribution of outcomes. Describe how this is used relative to evaluation of required water quality outcomes under critical conditions as well as average conditions.
2. Revise the RAA process described in Section 3.2.2 of the draft EWMP consistent with the revised Figure (from the EWMP Work Plan) to provide a clear RAA process to ensure required reductions shall be met.



RAA Modeling comments:

1. Provide a graph of the time series results, between 2001 and 2012, of modeled runoff volumes with observed runoff volumes and a statistical analysis of the comparison of modeled and observed values for runoff volume.
2. The model results of the baseline condition (loads are included in Table 10 of Appendix A) in terms of runoff volume and pollutant concentration are not provided in the EWMP. Per the RAA Guidelines, present the model results of the baseline condition for runoff volume, pollutant concentration and pollutant loadings (based on the 90th percentile critical condition at each analysis region for each pollutant of concern).
3. 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 pollutant load reductions and load reduction goals (as described in Appendix A and presented in Table 11 and Table 12). As such, the detailed reasonable assurance analysis (RAA) results for the proposed BMPs specifically for each analysis region should be provided in terms of 1) influent volume, concentration and load; 2) treated volume, concentration and load; and 3) effluent

volume, concentration and load through BMPs in the EWMP report to demonstrate the effectiveness of the proposed BMPs.

4. An example illustrating the modeling results of the bacteria in the receiving water at the downstream outlet of the watershed system should be presented to demonstrate the effectiveness of all BMPs in place (when compared with those of the baseline condition, for which all BMPs are not in place) and to demonstrate the compliance with final water quality limits (WQL) under the selected critical year.