



September 14, 2015

By E-Mail

Mr. Wayne Chiu
California Regional Water Quality Control Board, San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108

Dear Mr. Chiu

The County of Orange, as Principal Permittee of the Orange County Stormwater Program, and the Orange County Flood Control District (collectively, "County"), appreciate the opportunity to provide comments on Tentative Order No. R9-2015-0100 ("Tentative Order") proposing to amend the National Pollutant Discharge Elimination System (NPDES) Permit for *Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region, Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 (Regional MS4 Permit)* ("Regional MS4 Permit" or "Permit"). In addition to the County, the Cities of Dana Point, Laguna Beach, Laguna Hills, Laguna Niguel, Mission Viejo and San Juan Capistrano (collectively, "Permittee") were involved in the development of these comments and hereby concur with the issues herein. Where a Copermittee has more specific comments relevant to its jurisdiction, these will be expressed in separate written comments provided by the individual Copermittee.

The County supports vigorous implementation of programs and projects that will further water quality improvements in south Orange County. The County hereby submits these comments in belief that modifications to the Regional MS4 Permit are needed in order to better effectuate improvements to water quality as well as balance the role and obligations of the MS4s under the Clean Water Act and Porter-Cologne Water Quality Control Act.¹

¹ In addition to these supplemental comments, the County by this reference incorporates all prior letters, comments, reports, presentations, oral and written testimony, data, communications, and other evidence made by, on behalf of, and in support of the County and the Permittees during the various workshops, hearings, and meetings relevant to the adoption of Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Tentative Order No. R9-2015-0100. The County and Permittees reserve the right to provide further comment as applicable.

I. Stakeholder Workshops Have Been Effective.

The Permittee laud the efforts of Regional Board staff to collaboratively engage the Permittee and other stakeholders through the use of mediated, roundtable workshops. This manner of comment has worked well in allowing all viewpoints to be expressed with sufficient time provided to allow for vigorous discussion of issues regarding the Regional MS4 Permit.

II. The Alternative Compliance Pathway for Prohibitions and Limitations Is Necessary, But It Must Contain Compliance During the Planning Period Along With Workable Implementation Milestones.

The Tentative Order proposes to include an alternative compliance pathway that would offer the Permittees compliance with the prohibitions and limitations provisions of the Regional MS4 Permit. The Permittees generally support this approach, and believe that an alternative compliance pathway is necessary in light of the difficulties in achieving water quality standards, the strict liability regime created by the Ninth Circuit's decision in *Los Angeles County Flood Control District v. NRDC*,² and recent clarification on receiving water limitations language by the State Water Resources Control Board ("State Board") on the LA MS4 Permit.³

As has been stated in prior comments by the Permittee, federal law does not require MS4 dischargers to strictly comply with water quality standards. In the Ninth Circuit Court of Appeals decision in *Defenders of Wildlife v. Browner*,⁴ the court held that Congress only intended MS4 dischargers to meet the maximum extent practicable standard and that compliance with numeric effluent limitations was not required.⁵ In fact, EPA has not promulgated any binding regulation requiring strict compliance with numeric limits, but has only issued guidance

¹In addition, for the reasons provided by the Permittees in prior oral and written comments, the Permittees continue to assert that the Regional Board has no system-wide, jurisdiction-wide, watershed or other basis by which to enroll the Permittees in the Regional MS4 Permit. By virtue of filing this comment letter, the Permittees do not waive any argument with respect to this issue, and have enrolled in the Regional MS4 Permit under protest.

² *NRDC v. County of Los Angeles* 673 F.3d 880, 886 (9th Cir. 2011) (revd. on other grounds and remanded by *Los Angeles County Flood Control District v. Natural Resources Defense Council* (133 S.Ct. 710 (2013)) ("NRDC II).

³ Order WQ 2015-0075, *In the Matter of Review of Order No. R4-2012-0175, NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4*. ("State Board Order").

⁴ 191 F.3d 1159 (9th Cir. 1999); *see also* 33 U.S.C. § 1342(p)(3)(B).

⁵ This interpretation of the Clean Water Act has recently been upheld in the State of Maryland, and is thus, not unique to the Ninth Circuit. *Chesapeake Bay Foundation v. Md. Dep't of the Env't.*, Case No. 02-C-14-186144 (Anne Arundel Cir. Ct., Dec. 2, 2014); *In re Baltimore County MS4 Permit*, Case No. 03-C-14-000761 (Baltimore Cir. Ct., Oct. 7, 2014).

encouraging EPA regions and the States to adopt and require strict compliance with numeric effluent limits where feasible.⁶ Thus, compliance with receiving water limitations is a State and Regional Board requirement. To further emphasize this point, the Ninth Circuit Court of Appeals in *NRDC II* interpreted the LA MS4 Permit's receiving water limitations language as a contract requiring the LA permittees to strictly meet numeric standards in that any exceedance was a violation of the permit.⁷

Regional Board staff has interpreted the Regional MS4 Permit as requiring strict compliance with water quality standards, noting at the Regional Board's May 8, 2013 adoption hearing on Order No. R9-2013-0001 that the Permittees were in immediate noncompliance with the Permit and that compliance would not be achieved within the 5-year Permit term.⁸ The State Board, too, has clarified and mandated that regional water boards require strict compliance with water quality standards.⁹

As noted in Comments 13 through 15 in the County's November 19, 2014 comment letter and in various presentations by the Permittee and others throughout the adoption proceedings for the Permit, the Permittee have demonstrated that compliance with certain of the Permit's prohibitions, receiving water limitations and numeric effluent limits is not yet achievable, and may not be achievable in certain environmental conditions. This is due to the long-time urbanization of certain watersheds, the need to extensively retrofit this urbanization, the nature of stormwater transport, the lack of control municipalities have over certain pollutants, the technical and economic infeasibility of meeting certain numeric standards, and the need to change certain standards. Indeed, the Permittee have previously noted in testimony the key finding in *Pathogens In Urban Stormwater Systems* (American Society of Civil Engineers, 2014) that current recreational water quality criteria may likely be unattainable in wet weather. Therefore, in light of the State's mandate that water quality standards be strictly adhered to and the difficulties in attaining standards, an alternative compliance pathway is needed so that the

⁶ See, e.g., Letter from Andrew D. Sawyers, Office of Wastewater Management, and Benita Best-Wong, Office of Wetlands, Ocean and Watersheds, United States Environmental Protection Agency, to Water Division Directors, Regions 1-10, United States Environmental Protection Agency, *Revisions to the November 22, 2002 Memorandum "Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on LAs"* (Nov. 26, 2014) ("EPA recommends . . . where feasible and appropriate, numeric requirements that attempt to maintain pre-development runoff conditions." "This memorandum is guidance. It is not a regulation and does not impose legally binding requirements on EPA or States.").

⁷ *NRDC v. County of Los Angeles*, 673 F.3d at 892.

⁸ Transcript vol. II, 75:15-19 (May 8, 2013).

⁹ Order WQ 2015-0075, *In the Matter of Review of Order No. R4-2012-0175, NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4*. ("State Board Order").

Permittee can continue to diligently plan, fund and rigorously implement their watershed programs without the trepidation of open-ended enforcement that follows from a strict liability regime. If the Regional Board is to require strict compliance with the prohibitions and limitations provisions of the Regional MS4 Permit, the Permittee support the addition of an alternative compliance pathway where it is robust, provides for regulatory certainty, and its implementation is technically and economically feasible.

A. The Permittee Support The Flexibility Of The Alternative Compliance Pathway

The proposed alternative compliance pathway at Provision B.3.c provides flexibility

B. Alternative Compliance Should Be Provided During The WQIP Planning Process.

The Permittees fundamental issue with the proposed alternative compliance pathway is that it does not address compliance during the WQIP planning process. It is only after a plan has been submitted and approved by the Executive Officer of the Regional Board that a Permittee is in compliance with the Permit's prohibitions and limitations.¹⁰ This is directly contrary to the State Board's Order directing regional water boards to establish alternative compliance pathways and is in conflict with the findings and conclusions on which the Order is predicated. It also raises questions of the Permit's fairness as well as its legal validity. The Permittees request that the Regional Board include a provision that allows compliance during the planning phase of the WQIP consistent with the State Board Order.

In the State Board Order, the State Board recognized that strict compliance with receiving water limitations "may result in many years of permit noncompliance, because it may take years of technical efforts to achieve compliance with the receiving water limitations, especially for wet weather discharges."¹¹ This statement is also referenced in the Tentative Order.¹² In recognizing the difficulties with attaining water quality standards, the State Board not only directed regional water boards to adopt alternative compliance pathways, it also upheld the interim compliance provisions of the LA Permit that allow the LA County Permittees to maintain compliance during the planning process for the WMP/EWMP (the functional equivalent of the Regional MS4 Permit's WQIP), so long as the planning process "is clearly constrained in a manner that sustains incentives to move on to approval and implementation and is structured with clear, enforceable provisions."¹³ In fact, the State Board thought that there should have been more flexibility during the planning period than what was initially in the LA Permit, and allowed interim compliance

¹⁰ Tentative Order, Provision B.3(c)(2).

¹¹ State Board Order, pg. 15.

¹² Tentative Order, Finding 10, pg. 4. The Tentative Order attributes this to the Permittees, but it is actually a direct quote from the State Board Order. The Permittees assert there are broader grounds by which strict compliance is unwarranted and, in some cases, unachievable.

¹³ State Board Order, pp. 48-50.

even when there were deviations to the development schedule.¹⁴ The State Board went even further and directed regional water boards to consider and adopt the WMP/EWMP approach unless regional differences dictated variances.¹⁵

The Tentative Order does not incorporate interim compliance during the planning phase of a WQIP, and the accompanying Fact Sheet does not indicate any region-specific or permit-specific reason why a material variance is warranted. The only justification that has been given during workshops on the alternative compliance option is that EPA has supported San Diego's proposed approach and that the San Diego Region "is not L.A." This insufficiently addresses the issue of why the Permittee should not be afforded a basic threshold of compliance during the 18-month planning period. It is also in direct conflict with the State Board Order, which describes in detail the issues with meeting water quality standards and the need for compliance over time. It is also the County's understanding that other regional water boards are following the State Board Order's compliance directive, such as the forthcoming MS4 permit by the Santa Ana Water Board for North Orange County where staff has indicated that the alternative compliance option will allow for interim compliance.

The absence of interim compliance when a Copermittee is diligently undergoing WQIP planning is patently unfair. As explained above, it undermines the State Board Order as well as the Tentative Order's recognition that compliance with water quality standards may take years to achieve.¹⁶ It is unreasonable to insist on strictly meeting water quality standards and establishing a compliance pathway, but not extending such compliance to the point at which a Copermittee most needs it.

The WQIP planning process is a significant financial undertaking. In Los Angeles County, preparation of equivalent watershed management plans has cost approximately \$250,000 per watershed and these plans have identified final implementation costs per watershed in the range of \$300 million to \$6 billion.¹⁷ It also unnecessarily exposes the Permittee to potentially

¹⁴ *Id.* at pg. 50 (adding Part VI.C.4.g. to the LA Permit allowing deviation from the WMP/EWMP development schedule).

¹⁵ *Id.* at pg. 51 ("We direct all regional water boards to consider the WMP/EWMP approach to receiving water limitations compliance when issuing Phase I MS4 permits going forward. In doing so, we acknowledge that regional differences may dictate a variation on the WMP/EWMP approach, but believe that such variations must nevertheless be guided by a few principles. We expect the regional water boards to follow these principles unless a regional water board makes a specific showing that application of a given principle is not appropriate for region-specific or permit-specific reasons.").

¹⁶ State Board Order, Conclusion 2, pg. 76. ("However, we find that municipal storm water dischargers may not be able to achieve water quality standards in the near term and therefore that it is appropriate for municipal storm water permits to incorporate a well-defined, transparent, and finite alternative path to permit compliance that allows MS4 dischargers that are willing to pursue significant undertakings beyond the iterative process to be deemed in compliance with the receiving water limitations.").

¹⁷ County of Los Angeles Cost Study, *Projected WMP/EWMP Implementation Costs* (attached hereto).

unnecessary enforcement when significant resources and expenditures are underway to develop a long-term plan to improve water quality, particularly when a pollutant that is being addressed through the planning process is now the subject of an enforcement action or third party challenge. In other words, it would be unjustifiable to allow enforcement of a standard when the plan for attaining that standard is being developed and being reviewed by Regional Board staff. Furthermore, if the Regional MS4 Permit does not contain interim compliance, for the reasons set forth in the County's prior comments on the Regional MS4 Permit, it is unlawful. A permit that does not contain a compliance pathway or that is impossible to comply with is not in accordance with federal and state law.¹⁸

C. The Annual Milestone Requirement in the Alternative Compliance Pathway Is Arbitrary and Unworkable, and Should be Modified to Correspond to the Term of the MS4 Permit.

The alternative compliance pathway proposed in the Tentative Order includes Provision B.3.c(1)(a)(vii), recommended by certain stakeholders, requiring an annual milestone in the WQIP for each numeric goal. The Permittee believe that an annual milestone requirement is arbitrary, unworkable and may put the Permittee in a position to violate the California Constitution.

As has been expressed by the Permittee and Regional Board staff in the workshops leading up to the Tentative Order, the proposed alternative compliance pathway essentially requires the Permittee to develop an implementation plan and time schedule for each and every waterbody pollutant combination that exceeds or is likely to exceed a numeric limit. Thus, the alternative compliance pathway essentially requires the Permittee to develop a total maximum daily load (TMDL) and be under a Time Schedule Order for each pollutant to be deemed in compliance with the Permit.¹⁹ When EPA or the State establish a TMDL, Section 303(d) of the Clean Water Act does not require implementation plans, but instead, implementation plans are left to a State's discretion as to whether one will be established as part of the MS4 permit. When an implementation plan is established by a State, it is a document or section of a document detailing the suite of corrective actions needed to reduce pollution and remediate an impaired waterbody.²⁰

¹⁸ See County Comment Letter, Comments 13-15. See also, *Atlantic States Legal Fdn., Inc. v. Eastman Kodak Co.* 12 F.3d 353, 357 (2nd Cir, 1994); *Hughey v. JMS Development Corp.* 78 F.3d 1523, 1530 (11th Cir. 1996); *Divers Env't Conservation Organization v. State Water Resources Control Board*, 145 Cal.App.4th 246, 256 and 258 (2006).

¹⁹ The County has previously commented on the Regional MS4 Permit that the imposition of an implementation plan and a time schedule sidesteps the procedures called for in the Clean Water Act and shifts the Regional Board's regulatory obligations to the Permittees. See County Comments, Comment 17, pg. 26, fn. 35 (Jan. 11, 2013).

²⁰ US EPA, Total Maximum Daily Loads, Glossary <http://water.epa.gov/lawsregs/lawsguidance/cwa/tmdl/glossary.cfm#implementationplan> ("Current 303(d)

Section 130.33(b)(10) of the Code of Federal Regulations sets forth certain criteria that an implementation plan must include, such as a description of actions and/or management measures and a general timeline for implementing those actions or measures along with interim milestones. There is no federal (or state) legal requirement, or EPA guidance, regarding the specific timing of the milestone or even that the milestone be anything more than a suggested target to attain.

It has been consistently recognized that the WQIPs will develop plans over a multi-year period that may span 10, 20 or 30 years in order to attain standards. It is inconceivable that an implementation plan will contain 20 annual milestones or even that a Copermittee could identify what that milestone might be in year 16, for example, in either the development or early implementation of the plan. WQIPs will focus on studies, monitoring, and review of data to inform the Copermittee as to what corrective actions are necessary, which will result in revisions to the plan. To imbed a milestone into a WQIP for each and every year is arbitrary. It is simply not how project or program development works from a planning perspective. For instance, in developing a project for the benefit of multiple MS4s across a watershed, a few years can be spent applying for grant funding and encumbering monies for the project. Oftentimes, environmental studies and the design of a project are being prepared concurrent with funding planning. A watershed-based program or project involves the letting of multiple contracts with various partners and stakeholders. Contracts include grant agreements; right-of-way dedications and other real property agreements; cooperative agreements with state, municipal and developer partners; architect-engineer agreements; construction contracts; operations and maintenance agreements; and procurement contracts. Although a general schedule is put together, project milestones often span multiple years and can fluctuate as new information is obtained or in the event of changing circumstances. Based on the robustness of the planning and development process, it is simply arbitrary to imbed an annual milestone for each and every numeric goal into an enforceable regulatory document. It also has Regional Board staff micro-managing the implementation process whereby unnecessary time will be spent developing an annual milestone and getting Regional Board staff's re-approval for any slippage in the timeline.

In many cases, WQIPs will be predicated on finding the necessary funds for carrying out implementation. The costs to address the numeric goals contemplated in a WQIP will be significant. Many of years of planning funding will go into even one numeric goal where monies will be allocated by the legislative body on a fiscal year basis and encumbered over many years. In addition to outside grant funds, a program or project's source of revenue will also be derived from taxes and fees, which fluctuate annually depending on factors like the market, inflation and cost indices, income, development, and other factors. Taxes and fees are further constrained in California by Propositions 218 and 26. Most fee programs, for instance, are designed for 10 or

regulations do not require implementation plans, though some state regulations do require an implementation plan for a TMDL."); *see also*, 40 CFR § 130.

more years of fee collection in order to fund the necessary infrastructure or housing improvements needed. Therefore, a long-term implementation plan utilizing rigid annual milestones that include the funding and financing of projects is unworkable.

While an annual milestone may be the norm for a 5-year TSO that focuses on BMPs for a specific pollutant where final numeric limits are close to being attained, as demonstrated above, annual milestones for a 10 or 20-year plan for a difficult regulatory problem are arbitrary and unworkable. Instead, the Regional Board should consider a time period already used by state and federal law, which is the 5-year term of the Permit. When a TMDL implementation plan is developed, the plan is reported on in the annual report and then again in the Report of Waste Discharge. The next permit is fashioned based on the progress the Copermittee has made in that 5-year permit term.²¹ The Regional Board should not deviate then from the established timelines already set forth in the law as the appropriate place to review progress is at the renewal of the Regional MS4 Permit. Compliance should not hinge on whether an individual action has occurred, but should be predicated on the collective actions of the Permit term, such that a Copermittee can demonstrate that reasonable progress has been made in attaining water quality standards.

D. The Prohibitions and Limitations Language of Provision A Should Specify That Compliance Can Be Determined By Utilizing The Alternative Compliance Pathway At Provision B.3.c.

The Prohibitions and Limitations language in Provision A should be aligned with the Water Quality Improvement Planning process described in Provision B. The Permittee appreciate the efforts to clarify the compliance determination in Provision B.3.c by linking it back to Provision A. However, as currently incorporated into the Tentative Order, Provision A makes no reference to Provision B.3.c, and thus, the Prohibitions and Limitations language may still be interpreted as stand-alone provisions that could subject the Permittee to state and federal enforcement actions as well as third party actions under the Clean Water Act's citizen suit provisions. To prevent this from occurring, a clear linkage between the compliance provisions in Provision B and the prohibitions, receiving water limitations, and effluent limitations must be established. Compliance with Provisions A.1, A.2 and A.3 should be linked to Provision B so that it is clear that the compliance mechanism for A.4 is the Water Quality Improvement Plan (Provision B) and/or the TMDL (Attachment E), as applicable. Permits are construed as contracts, and such a change would be a routine matter of contract drafting whereby contract provisions refer to one another for ease of reading and interpretation.

This change has been requested throughout the workshop and adoption proceedings for the Regional MS4 Permit, but no reason has been given for why this change could not be made. The

²¹ This is also how air quality laws work under the Clean Air Act where a state implementation plan must demonstrate reasonable progress towards national ambient air quality standards, and is revisited on an 8-year basis.

Provision A language is not sacrosanct, and could be modified accordingly without changing the substance of the prohibitions and limitations set forth therein.

III. Provision E.2 Should Be Clarified That Implementation of A Copermittee's Illicit Discharge Detection and Elimination Program Constitutes Compliance with Effectively Prohibiting Non-Stormwater Discharges.

Section 402(p)(3)(B)(ii) of the Clean Water Act imposes a requirement to “effectively prohibit” non-storm water discharges. The State Board Order acknowledged that preventing all non-stormwater runoff into an MS4 can be a nearly impossible standard to meet at times, since third parties—such as residents watering their lawns in a reasonable manner—are likely to cause at least some incidental runoff to enter a Copermittee's MS4.²² Other regional water boards have determined that Permittee are in compliance with the Clean Water Act's mandate to “effectively prohibit” all dry weather discharges when the Copermittee is implementing its illicit discharge prevention program. However, the Tentative Order in Provision E.2 could be interpreted to impose strict liability on the Permittee even where: (1) all or most dry weather flows are diverted before the water reaches a water of the State, (2) the discharge to the MS4 resulted from actions that the Copermittee may have very limited ability to control, and (3) the Copermittee was fully implementing its illicit discharge prevention program.

Provision E.2 of the Tentative Order should be amended to clarify that implementation of a Copermittee's illicit discharge, detection and elimination constitutes compliance with the requirement to effectively prohibit non-stormwater discharges.

IV. Compliance Dates For The Bacteria TMDL Should Be Changed.

Attachment E notes that the Responsible Permittee for MS4 discharges to waterbodies listed in Table 6.0 must be in compliance with final TMDL compliance requirements. However, the TMDL includes language stating that specific waterbody or beach segments included in the TMDL that have been delisted from the 2008 303(d) list are not subject to any further action as long as monitoring data continues to support compliance with water quality standards. Thus, the language in Attachment E is in conflict with the TMDL, and should be revised to reflect that no action is needed for delisted waterbody segments.

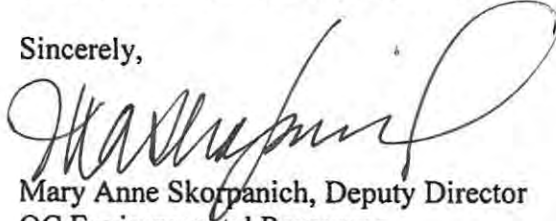
V. Exemption For Self Remediating Priority Development Projects

The list Priority Development Exemptions (Section E.3.b.(3)) should be revised to include projects that are effectively self remediating (i.e. all rainfall is retained) including, but not limited to, reservoirs and swimming pools.

²² State Board Order, pg. 48, fn. 133 (“We recognize that even the most comprehensive efforts to address unauthorized non-storm water discharges may not eliminate all such discharges.”).

Thank you for your attention to our comments. Please contact each of the undersigned directly if you have questions. For technical questions please also contact Chris Crompton at (714)955-0630 or Richard Boon at (714)955-0670.

Sincerely,



Mary Anne Skorpanich, Deputy Director
OC Environmental Resources



Ryan Baron, Senior Deputy County Counsel
Office of the County Counsel

Attachments: A - Summary of Projected WMP/EWMP Costs

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Watershed	Project Type	Capital Costs	O/M Costs	TOTAL
Upper Santa Clara River	EWMP	\$623.7 Million	-	\$623.7 Million
Upper LA River	EWMP	\$6.097 Billion	\$210.84 Million (Annually)	\$6.308 Billion
Rio Hondo/San Gabriel River	EWMP	\$1.417 Billion	-	\$1.417 Billion
Upper San Gabriel River	EWMP			\$2.14 Billion
Malibu Creek	EWMP	\$194.6 Million	\$3.7 Million	\$198.3 Million
Marina Del Rey	EWMP	\$347.4 Million	\$44.5 Million (Total)	\$391.9 Million
North Santa Monica Bay Coastal Watersheds	EWMP	\$32.5 Million	\$21.7 Million (20-year life cycle)	\$52.2 Million (20-year life Cycle)
Santa Monica Bay Jurisdictions 2 & 3	EWMP	\$648.7 Million	\$94.7 Million (20-year life cycle)	\$743.4 Million
Santa Monica Bay and Dominguez Channel (Beach Cities)	EWMP	\$89 Million	\$3.1 Million (Annually)	\$150 Million (20-year life cycle)
Palos Verdes Peninsula Agencies	EWMP	\$129.5 Million	\$1.52 Million (Annually)	\$131.02 Million
Ballona Creek	EWMP	\$2.723 Billion (by year 2021)	\$77.74 Million (annually)	\$2.8 Billion
Dominguez Channel	EWMP	\$1.294 Billion	\$12.4 Million (in year 2041)	\$1.3064 Billion
Los Angeles River Upper Reach 2	WMP	\$311 Million	-	\$311 Million
Lower Los Angeles River	WMP	\$293 Million	-	\$293 Million
East San Gabriel Valley	WMP	\$646.5 Million	-	\$646.5 Million
Lower San Gabriel River	WMP	\$64.63 Million	-	\$64.63 Million
Los Cerritos Channel	WMP	\$332 Million?		\$332 Million?