

## Summary of the Revisions to the Proposed Final Staff Report and proposed Final Trash Amendments

For reference, below are the revisions made to the Proposed Final Staff Report and proposed Final Trash Amendments released on December 31, 2014. Minor and non-substantive revisions made to the Proposed Final Staff Report (December 2014) are shown in blue font and double-strikeout/double-underline. Revisions made to the proposed Final Trash Amendments (Appendices D and E) are shown in blue and bolded font and double-strikeout/double-underline. Revisions made to the Draft Staff Report, including the Draft Substitute Environmental Documentation (June 2014), are shown in red font and single-strikeout/single-underline. Revisions made to the proposed Trash Amendments (Appendices D and E) are shown in red font and single-strikeout/double -underline.

No.	Page	Revision(s)
1	Staff Report pp. 5 & 75	Revised the sentence as follows: "The reconsideration would occur for all existing trash TMDLs, except for the Los Angeles River Watershed and Ballona Creek <del>and Wetland</del> Trash TMDLs, because those two TMDLs are approaching final compliance deadlines of <u>September 30, 2016</u> and <del>July 4, 2014 and September 30,</del> 2015, respectively."
2	Staff Report pp. 8-9, 75	Revised the names of the following trash TMDLs as indicated: <ul style="list-style-type: none"> <li>• <del>East Fork</del> San Gabriel River <u>East Fork</u></li> <li>• Ballona Creek <del>and Wetland</del></li> <li>• Malibu Creek <u>Watershed</u></li> <li>• Lincoln Park <u>Lake</u></li> </ul>
3	Staff Report p. 12	Removed the following from Table 1: " <del>Any new development within the MS4 permittee's jurisdiction must be built to immediately comply with Track 1 or Track 2. MS4 permittees designated after the effective date of the implementing permit would be in full compliance ten years after the date of designation.</del> "
4	Staff Report pp. 12-13	Revised the section as follows: To provide consistency statewide with a water quality objective, the Trash Amendments <del>propose</del> <u>would establish</u> the following narrative water quality objectives <u>for the Ocean Plan and the ISWBE Plan.</u>  <u>The narrative water quality objective for the Ocean Plan would be: Trash shall not be present in ocean waters, along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance.</u>  <u>The narrative water quality objective for the ISWBE Plan would be: Trash shall not be present in inland surface waters, enclosed bays, estuaries, and along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance.</u>  <del>no trash Trash shall not accumulate be present in state waters (or in areas adjacent to state waters) in amounts that would either adversely affect beneficial uses, or cause nuisance.</del>

5	Staff Report p. 18	Revised the sentence as follows: “ <u>The reference watershed must be comprised of similar types and extent of sources of trash and land uses (including priority land uses and all other land uses), facilities, or areas as the permittee’s watershed.</u> ”
6	Staff Report p. 19	Revised the sentence as follows: “ <del>New development within a MS4 Phase I and Phase II permittee’s jurisdiction must be built to comply with Track 1 or Track 2, whichever Track was selected by the permittee.</del> ”
7	Staff Report p. 19	Revised the sentences as follows: “ <u>Several of the time schedule provisions in the proposed final Trash Amendments do not apply to MS4 permittees subject to the San Francisco Bay MRP or the East Contra Costa Municipal Storm Water Permit, because those permits already require control requirements substantially equivalent to Track 2.</u> ” “ <u>In order to reduce duplicative efforts, the Trash Amendments’ requirement that MS4 permittees submit implementation plans does not apply to a San Francisco Bay MRP or an East Contra Costa permittee if the San Francisco Bay Water Board or the Central Valley Water Board determines that the Short-Term Trash Load Reduction Plan and Long-Term Trash Load Reduction Plan for that permittee are equivalent to the implementation plan required by the Trash Amendments. Additionally, the pertinent permitting authority for the aforementioned permits may establish an earlier full compliance deadline than the ten-year compliance schedule specified for Track 2.</u> ”
8	Staff Report pp. 27, 189	Revised as follows: CalEPA.
9	Staff Report p. 78	Revised as follows: Ballona Creek <del>Watershed and Wetland</del> .
10	Staff Report p. 83	Revised the sentence as follows: “ <u>At present, the load allocations are implemented through either a conditional waiver from waste discharge requirements or waste discharge requirements.</u> ”
11	Staff Report p. 85	Revised the sentence as follows: “Therefore, this approach is not recommended. <del>for existing developments. However, this alternative is appropriate for new developments in priority land uses where it would be unreasonable to design and construct a development out of compliance with the Trash Amendments and subsequently need to develop a plan to come into compliance.</del> ”
12	Staff Report p. 86	Revised the sentence as follows: “ <b>Staff Recommendation:</b> <u>Require immediate compliance for new developments in priority land uses (Consideration 2).</u> ”
13	Appendix A p. A-15	Revised the sentence as follows: “In the Los Angeles River Watershed, the <del>Santa Clara Valley Urban Runoff Pollution Prevention Program U.S. EPA and Los Angeles Water Board staff</del> performed Rapid Trash Assessment in the lakes, along lakeshores, near fences and at the outlet of storm drains to document the impairment of Los Angeles area lakes.”

14	Appendix A p. A-16	Revised the names of the following trash TMDLs as indicated: <ul style="list-style-type: none"> <li>• <del>East Fork</del> San Gabriel River <u>East Fork</u></li> <li>• Ballona Creek <del>and Wetland</del></li> <li>• Malibu Creek <u>Watershed</u></li> </ul>
15	Appendix A pp. A-24-25	Revised the names of the following trash TMDLs as indicated: <ul style="list-style-type: none"> <li>• <del>East Fork</del> San Gabriel River <u>East Fork</u></li> <li>• Ballona Creek <del>and Wetland</del></li> <li>• Malibu Creek <u>Watershed</u></li> </ul>
16	Appendix D – Ocean Plan Trash Amendment p. D-1	Revised II.C.5 as follows: “Trash* shall not <del>accumulate be present</del> in ocean waters, along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance.”
17	Appendix D – Ocean Plan Trash Amendment p. D-2	Revised Footnote <del>991</del> as indicated: “In the Los Angeles Region, there are fifteen (15) trash TMDLs for the following watersheds and water bodies: Los Angeles River Watershed, Ballona Creek <del>and Watershed Wetland</del> , Malibu Creek Watershed, Santa Monica Bay Nearshore and Offshore, <del>East Fork of the</del> San Gabriel River <u>East Fork</u> , Revolon Slough <del>and</del> Beardsley Wash, Ventura River Estuary, Machado Lake, Lake Elizabeth, Lake Hughes, Munz Lake, Peck Road Park Lake, Echo Park Lake, Lincoln <del>Lake Park Lake</del> and Legg Lake. Three of these were established by the US EPA: Peck Road Park Lake, Echo Park Lake and Lincoln <u>Park Lake</u> .”
18	Appendix D – Ocean Plan Trash Amendment p. D-5-6	Revised Footnote <del>4992</del> as follows: “ <del>The time schedule requirement in Chapter III.L.4.a.1 requiring MS4* permittees to elect Chapter III.L.2.a.1 (Track 1) or Chapter III.L.2.a.2 (Track 2) does not apply to MS4* permittees subject to the Municipal Regional Stormwater NPDES Permit (MRP) for issued by the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board) or the East Contra Costa Municipal Storm Water Permit issued by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) because thatose permits already requires control requirements substantially equivalent to Track 2. The time schedule requirement in Chapter III.L.4.a.1 requiring MS4* permittees to submit an implementation plan does not apply to the MRP above permittees if San Francisco Bay Water Board-pertinent permitting authority* determines that an MRP such permittee has already submitted an implementation plan prior to the effective date of the Trash Provisions* that is equivalent to the implementation plan required by Chapter III.L.4.a.1. In the aforementioned permits, the pertinent permitting authority* may establish an earlier full compliance deadline than that specified in Chapter III.L.4.a.3.</del> ”
19	Appendix D – Ocean	Revised III.L.4.a.2 as follows: “For MS4* permittees that elect to comply with Chapter III.L.2.a.1 (Track 1), <del>the implementing permit shall state that</del> ”

	Plan Trash Amendment p. D-7	full compliance shall occur within ten (10) years of the effective date of the first implementing permit <del>(whether such permit is re-opened, re-issued or newly adopted), along with except</del> <u>compliance for any new development within the MS4 permittee's jurisdiction must be built to immediately comply with Track 1, and</u> as specified in Chapter <del>IVA-5III.L.4.a.5.</del> <u>The permit shall also require these permittees to demonstrate</u> achievements of interim milestones such as an average of ten percent (10%) of the full capture systems* installed every year <u>or other progress to full implementation.</u> "
20	Appendix D – Ocean Plan Trash Amendment p. D-7	Revised III.L.4.a.3 as follows: "For MS4* permittees that elect to comply with Chapter III.L.2.a.2 (Track 2), <u>the implementing permit shall state that</u> full compliance shall occur within ten (10) years of the effective date of the first implementing permit <del>(whether such permit is re-opened, re-issued or newly adopted), along with except</del> <u>compliance for any new development within the MS4 permittee's jurisdiction must be built to immediately comply with Track 2, and</u> as specified in Chapter <del>IVA-5III.L.4.a.5.</del> <u>The permit shall also require these permittees to demonstrate</u> achievements of interim milestones such as average load reductions of ten percent (10%) per year <u>or other progress to full implementation.</u> "
21	Appendix D – Ocean Plan Trash Amendment p. D-13	Revised the Reference Approach example within the definition of full capture system equivalency as follows: " <u>The reference watershed must be comprised of similar types and extent of sources of trash* and land uses (including priority land uses* and all other land uses), facilities, or areas as the permittee's watershed.</u> "
22	Appendix D – Ocean Plan Trash Amendment p. D-14	Revised the definition of equivalent alternate land uses as follows: " <del>(6)</del> <b>Equivalent alternate land uses:</b> An MS4* permittee with regulatory authority over priority land uses* may issue a request to the applicable permitting authority* that <del># the MS4* permittee</del> be allowed to <u>comply under Chapter III.L.2.a.4 substitute a land use identified above</u> with <u>an</u> alternate land uses within <del>its the MS4* permittee's</del> jurisdiction that generates <u>s</u> rates of trash* that <del>are is</del> equivalent to or greater than the priority land use* being substituted <u>one or more of the high density residential, industrial, commercial, mixed urban, and/or public transportation station sites, facilities, or land uses defined above.</u> "
23	Appendix E – ISWEBE Part 1 p. E-1	Revised III. <del>BA</del> as follows: "TRASH shall not <del>accumulate be present in</del> <u>inland</u> surface waters, <u>enclosed bays, estuaries, and</u> along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance."
24	Appendix E – ISWEBE Part 1 p. E-1-2	Revised Footnote <del>4021</del> as indicated: "In the Los Angeles Region, there are fifteen (15) trash TMDLs for the following watersheds and water bodies: Los Angeles River Watershed, Ballona Creek <del>and Watershed Wetland</del> , Malibu Creek Watershed, Santa Monica Bay Nearshore and Offshore, <u>East Fork of the</u> San Gabriel River <u>East Fork</u> , Revolon Slough <del>and</del> Beardsley Wash, Ventura River Estuary, Machado Lake, Lake Elizabeth, Lake Hughes, Munz Lake, Peck Road Park Lake, Echo Park Lake, Lincoln <del>Lake-Park Lake</del> and Legg Lake. Three of these were established by the US-EPA: Peck Road Park Lake, Echo Park Lake and

		Lincoln <u>Park Lake.</u> ”
25	Appendix E – ISWEBE Part 1 p. E-5	Revised IV.A.4. as follows: “A PERMITTING AUTHORITY may require dischargers <u>described in Chapter IV.A.2.c or Chapter IV.A.3.d</u> , that are not subject to Chapter IV. <del>CA</del> .3 herein, to implement <u>any appropriate TRASH</u> controls in areas or facilities that may generate TRASH.”
26	Appendix E – ISWEBE Part 1 p. E-5	Revised Footnote <u>4032</u> as follows: “ <u>The time schedule requirement in Chapter IV.A.5.a.1 requiring MS4* permittees to elect Chapter IV.A.3.a.1 (Track 1) or Chapter IV.A.3.a.2 (Track 2) does not apply to MS4* permittees subject to the Municipal Regional Stormwater NPDES Permit (MRP) for issued by the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board) or the East Contra Costa Municipal Storm Water Permit issued by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) because those permits already requires control requirements substantially equivalent to Track 2. The time schedule requirement in Chapter IV.A.5.a.1 requiring MS4 permittees to submit an implementation plan does not apply to the <del>MRP</del>above permittees if the <del>San Francisco Bay Water Board</del> pertinent PERMITTING AUTHORITY determines that <del>an MRP such</del> permittee has already submitted an implementation plan prior to the effective date of the TRASH PROVISIONS that is equivalent to the implementation plan required by Chapter IV.A.5.a.1. In the aforementioned permits, the pertinent PERMITTING AUTHORITY may establish an earlier full compliance deadline than that specified in Chapter IV.A.5.a.3.</u> ”
27	Appendix E – ISWEBE Part 1 p. E-7	Revised IV.A.5.a.2 as follows: “For MS4 permittees that elect to comply with Chapter IV. <del>BA</del> .3.a.1 (Track 1), <u>the implementing permit shall state that full compliance shall occur within ten (10) years of the effective date of the first implementing permit (whether such permit is re-opened, re-issued or newly adopted), along with except compliance for any new development within the MS4 permittee’s jurisdiction must be built to immediately comply with Track 1, and</u> as specified in Chapter IV.A.5.a.5. The permit shall also require these permittees to demonstrate achievements of interim milestones such as an average of ten percent (10%) of the full capture systems installed every year <u>or other progress to full implementation.</u> ”
28	Appendix E – ISWEBE Part 1 p. E-7	Revised IV.A.5.a.3 as follows: “For MS4 permittees that elect to comply with Chapter IV. <del>BA</del> .3.a.2 (Track 2), <u>the implementing permit shall state that full compliance shall occur within ten (10) years of the effective date of the first implementing permit (whether such permit is re-opened, re-issued or newly adopted), along with except compliance for any new development within the MS4 permittee’s jurisdiction must be built to immediately comply with Track 2, and</u> as specified in Chapter IV.A.5.a.5. The permit shall also require these permittees to demonstrate achievements of interim milestones such as average load reductions of ten percent (10%) per year <u>or other progress to full implementation.</u> ”
29	Appendix E – ISWEBE	Revised the sentence as follows: “ <u>Where a PERMITTING AUTHORITY makes a determination pursuant to Chapter IV.A.43.d that a specific land</u>

	Part 1 p. E-8	<u>use generates a substantial amount of TRASH, that permitting authority has discretion to determine the time schedule for full compliance.”</u>
30	Appendix E – ISWEBE Part 1 p. E-12	Revised the Reference Approach example within the definition of full capture system equivalency as follows: <u>“The reference watershed must be comprised of similar types and extent of sources of TRASH and land uses (including PRIORITY LAND USES and all other land uses), facilities, or areas as the permittee’s watershed.”</u>
31	Appendix E – ISWEBE Part 1 p. E-13	Revised the definition of equivalent alternate land uses as follows: <u>“(C) <b>Equivalent alternate land uses:</b> An MS4 permittee with regulatory authority over PRIORITY LAND USES may issue a request to the applicable PERMITTING AUTHORITY that <del>the MS4 permittee</del> be allowed to <del>comply under Chapter IV-BA-3.a.1</del> <u>substitute a land use identified above</u> with <u>an</u> alternate land uses within <del>the MS4 permittee’s</del> jurisdiction that generates rates of TRASH that <del>are</del> <u>is</u> equivalent to or greater than the PRIORITY LAND USE being substituted <del>one or more of the high density residential, industrial, commercial, mixed urban, and/or public transportation station sites, facilities, or land uses defined above.”</del></u>