

Los Angeles Regional Water Quality Control Board

October 16, 2015

Permittees of the Upper San Gabriel River EWMP Group¹
(See Distribution List)

REVIEW OF THE UPPER SAN GABRIEL RIVER EWMP GROUP'S 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 Upper San Gabriel River EWMP 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 and the Addendum submitted on August 31, 2015 by the Upper San Gabriel River EWMP 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 San Gabriel River Group EWMP include the County of Los Angeles, and Los Angeles County Flood Control District, and the Cities of Baldwin Park, Covina, Glendora, Industry, La Puente, and West Covina.

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. On September 03, 2015, the Board provided public notice and a 32-day period to allow for public review and comment on the revisions to the draft EWMP pertaining to the addition of the jurisdictional area of the City of West Covina (mainly appendix E). The Board received one joint letter from Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper. 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 October 06, 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 14, 2015**.

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

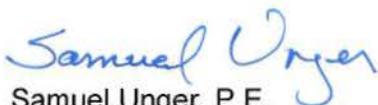
If the necessary revisions are not made and the Group does not ultimately receive approval of its EWMP within 40 months of the effective date of the LA County MS4 Permit, the Group will be subject to the baseline requirements in Part VI.D and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment P 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 final WQBELs and receiving water limitations pursuant to Part VI.E. and set forth in Attachment P 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: Upper San Gabriel River EWMP Group 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

Upper San Gabriel River EWMP Group

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
General		
Executive Summary		The Executive Summary of the draft EWMP states “ <i>The USGR EWMP highlights 10 multi-benefit regional projects, some of which will retain the stormwater volume from the 85th percentile, 24-hour storm for the drainage areas tributary to the multi-benefit regional projects.</i> ” As per Appendix B-1 and Appendix E of the draft EWMP, there are a total of 11 multi-benefit regional projects, including Cortez Park in West Covina, and all proposed regional projects appear to be designed to retain the stormwater volume from the 85th percentile, 24-hour storm for the drainage areas tributary to the projects. Revise the Executive Summary accordingly.
Section 3.2.1.2		Section 3.2.1.2 of the draft EWMP states that “ <i>based on the extensive initial screening process and through coordination with the Group Members, 10 “signature” or example regional EWMP project sites were selected for conceptual design and inclusion in the EWMP plan.</i> ” The phrase “ <i>example regional EWMP project sites</i> ” is used throughout the draft EWMP. Clarify the usage of the word “ <i>example</i> ” (i.e., either the proposed project will be implemented, or may be substituted with an equivalent multi-benefit regional project capable of retaining the specified water quality design volume within the same sub-basin and/or jurisdiction).
Appendix C-3 Section C-3.1		Appendix C-3 Section C-3.1 of the draft EWMP states that “ <i>Appendix C-6 lists the identified projects as presented in the Work Plan.</i> ” However, the EWMP Work Plan submitted to the Regional Board in June 2014 does not list any of the projects listed in Appendix C-6 of the draft EWMP. In the aforementioned sentence, substitute “ <i>as presented in the Work Plan</i> ” with “ <i>through data request</i> ” or alternatively, clarify what Work Plan is being referred to. Additionally, clarify in the notes section of Appendix C-6 what IRWMP is an abbreviation for.
Appendix C-6 Table C-6-2		The following projects listed in Appendix C-6 Table C-6-2 of the draft EWMP lists service start dates indicating that BMPs are already in place and therefore should be moved to Appendix C-6

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		Table C-6-1 of the draft EWMP where the existing regional BMPs are listed: <ul style="list-style-type: none"> • Walnut Creek Spreading Basin Pump Station Project (1/17/14) • Big Dalton spreading grounds improvements (1/1/15) • Live Oak spreading ground improvements (8/23/13)
Appendix C-6 Table C-6-4		The Avocado Heights Multi-Use Trail listed in Appendix C-6 Table C-6-4 of the draft EWMP should be moved to Appendix C-6 Table C-6-3 of the draft EWMP which is the table that lists existing distributed BMPs.
Water Quality Characterization		
Section 2.6.2	Part VI.C.5.a.i (page 60)	The draft EWMP shall consider data collected during development of the SGR Bacteria TMDL. Revise the water quality characterization accordingly.
Water Body Pollutant Classification		
	Part VI.C.5.a.ii (page 60)	The draft EWMP shall clearly specify all applicable interim and final numeric WQBELs (for both dry weather and wet weather, where applicable) for Category 1 water body-pollutant combinations (WBPCs). Additionally, the draft EWMP shall also specify all applicable receiving water limitations for Category 2 and 3 WBPCs. Revise the draft EWMP accordingly.
Executive Summary		In the draft EWMP under Executive Summary, Identification of Water Quality Priorities, make the following changes to maintain consistency with Table 2-2: <ul style="list-style-type: none"> • Under Category 2: move MBAS, sulfate, chloride, and alpha-endosulfan to Category 3 • Under Category 2: add benthic-macroinvertebrates, DO, and pH • Under Category 3: add TDS and cyanide
Table 2-2		Add a footnote to Table 2-2 of the draft EWMP clarifying that as per the San Gabriel River Impaired Tributaries Metals and Selenium TMDL (SGR Metals TMDL), San Gabriel Reaches 4 and 5, Thompsons Wash, Big Dalton Wash, Little Dalton Wash, and San Dimas Wash, which are not impaired waterbodies on the 303(d) list, are subject to the wet weather Waste Load Allocation (WLA) for Lead.
Source Assessment		
Section 2.6	Part VI.C.5.a.iii.(1). (a) (page 60-61)	Specify in Section 2.6 of the draft EWMP if a review of the following data was completed: <ul style="list-style-type: none"> • Findings from the Permittees' Illicit Connections and Illicit Discharge Elimination programs, Industrial/Commercial Facilities programs, Development Construction programs, and Public Agency Activities programs regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>receiving waters and any other stressors related to MS4 discharges causing or contributing to the water quality priorities.</p> <ul style="list-style-type: none"> • Data and conclusions from watershed model results regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters. • Data and conclusions from Permittee(s)' monitoring programs regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters.
Section 2.6	Part VI.C.5.a.iii.(1) (page 60-61)	<p>Although Section 2.6 of the draft EWMP discusses some sources of water quality issues in general, findings should be specific to the San Gabriel River Watershed where possible. Additionally, elaborate further on sources of each water quality priority identified in the draft EWMP.</p> <p>The EWMP shall consider source investigations from the USEPA LA Area Lakes TMDL for Puddingstone Reservoir and from the recently adopted SGR Bacteria TMDL in Section 2.6.2 of the draft EWMP. Revise the draft EWMP accordingly.</p>
Selection of Watershed Control Measures		
Section 2.4, 5.3, & Table 2-4	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>Section 2.4 and 5.3 of the draft EWMP discusses how the proposed bacteria compliance schedule for the San Gabriel River Watershed was developed using a similar schedule to the LA River Bacteria TMDL. The Group shall consider the Indicator Bacteria in the San Gabriel River, Estuary, and Tributaries TMDL (SGR Bacteria TMDL) in Basin Plan Amendment Resolution No. R15-005 Attachment A (adopted by the Regional Board on June 10, 2015) which is anticipated to be effective by the next permit cycle. Note that the aforementioned SGR Bacteria TMDL establishes a 20-year implementation schedule, which corresponds to a final compliance deadline of 2036 (assuming a TMDL effective date of early to mid-2016) rather than 2040 as proposed in Table 2-4 of the draft EWMP.</p> <p>The EWMP shall use the upcoming SGR Bacteria TMDL compliance schedule or, include more information to support the proposed final milestone of 2040 (e.g., economic/ technological justification, specific set of BMPs proposed to address metals, etc.) and to provide clarity regarding the scope of the deadline. Without additional justification, the final milestone to address all water quality priorities must be set at 2036 to match the anticipated final compliance date for bacteria.</p>
Section 3.2.3		Section 3.2.3 of the draft EWMP for redevelopment LID states the

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>following: <i>“For the RAA, the LID BMPs are designed to capture the 85th percentile storm from the parcels on which they are located.”</i> Note that a redevelopment project requires 50% or more of the site to be redeveloped. If less than 50% of the site is redeveloped, only the redeveloped portion of the site has to retain the 85th percentile storm. The Group should consider the use of the term <i>“significantly redeveloped site”</i> and also discuss whether this consideration changes its RAA.</p>
Section 3.3.1	Part VI.C.5.b.iv.(1). (a) (page 63)	<p>Section 3.3.1 of the draft EWMP does not appear to propose any modifications to the Development Construction Program, Industrial/Commercial Facilities Program, Illicit Connection and Illicit Discharges Detection and Elimination Program, Public Agency Activities Program, and Public Information and Participation Program. Hence, Section 3.3.1 must explicitly state and clarify that no modifications and only enhancements are proposed for the aforementioned programs and therefore, the standard permit provisions (Parts VI.D.4 through VI.D.10) will be implemented.</p>
Table 3-6	Part VI.D.6 (pages 91-97)	<p>Table 3-6 of the draft EWMP lists enhanced MCMs proposed by the Group members. The table under City of Glendora states the following <i>“Provide educational material while performing Industrial/Commercial Inspections, post materials on city website and provide to the Industry Manufacturing Council.”</i> Please elaborate on how educational materials will be provided to the Industry Manufacturing Council in an effective manner. Clarify how the on-site distribution of educational materials during inspections is an enhancement over the Permit requirements for distributing educational materials.</p> <p>Furthermore, the table under City of Industry states the following <i>“Track facilities with Industrial Permits or No Exposure Certifications (NEC) on an annual basis.”</i> However, as per Part VI.D.6.e.ii-iii of the LA County MS4 Permit, the Group shall update its inventory of critical sources (including facilities with Industrial Permits or NECs) at least annually. Therefore, omit the aforementioned enhanced MCM because it is already a permit requirement and not an enhancement.</p>
Section 2.3.3	Part VI.E.3 (pages 148-149)	<p>Table 2-3 of the draft EWMP, for Puddingstone Reservoir, states the following: <i>“USEPA TMDLs, which do not contain interim milestones or implementation schedule. The Permit (Part VI.E.3.c, pg. 145 – RWQCB, 2012) allows MS4 Permittees to propose a schedule in the EWMP.”</i> Table 2-4 of the draft EWMP indicates that the Harbor Toxics TMDL was used to determine a milestone achieving Puddingstone Reservoir TMDLs. Based on discussions with the Group, it seems the proposed deadline of 2032 is based on the scheduling of remedial actions for internal lake storage of legacy pollutants including chlordane, DDT, dieldrin, and PCBs.</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>Revise the EWMP to include interim and final compliance deadlines for contemporaneous loading of these and other pollutants including nutrients and mercury via the MS4 in the northern drainage area to the reservoir. Based on the TMDL source analysis and considering the geographic scope of the drainage area to be addressed, propose a shorter timeframe to address MS4 loadings.</p> <p>The Group must propose a final deadline that is as short as possible taking into account the time since USEPA established the TMDL and the technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the WLAs. If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements with numeric milestones and dates for final compliance. See East San Gabriel Valley WMP Table 5-15 for milestones and deadlines proposed by other MS4 permittees discharging to Puddingstone Reservoir.</p>
Section 4.4.2	Part VI.C.5.b.iv.(4). (d) (page 64)	Section 4.4.2 of the draft EWMP must include milestones for Puddingstone Reservoir as it does for other waterbodies.
Section 3.2.5		Section 3.2.5 of the draft EWMP lists in bullets considerations/steps that need to be taken for implementing Green Streets projects. Provide milestones for the listed considerations/steps.
Section 5.3	Part VI.C.5.b.iv.(4). (d) (page 64)	<p>As per Section 5.3 and Appendix D-3 of the draft EWMP, a summary is given for BMPs to be implemented by waterbodies/sub-watersheds within each jurisdiction. Section 5.3 of the draft EWMP shall also include a table similar to the tables in Appendix D-3 where it lists the group members (instead of the sub-watershed/waterbody), EWMP milestones, the BMP categories (LID, Green Streets, Regional BMPs as listed already in Appendix D-3 tables), and total BMP Capacity. This table must also indicate when the Minimum Control Measures (MCMs) and/or the Enhanced MCMs will be implemented.</p> <p>As additional text and/or footnotes to the aforementioned table, explain in detail when the Enhanced MCMs, LID, Green Streets, and Regional BMPs will be implemented.</p> <p>Additionally, specify the expected completion dates for each of the Regional BMPs proposed in the draft EWMP.</p>
Section 5.4		The last sentence of Section 5.4 of the draft EWMP states <i>“Overall, the EWMP Implementation Plan and related non-stormwater reduction programs are expected to effectively eliminate non-</i>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<i>stormwater flows in USGR</i> ". Add to the end of the aforementioned sentence: "consistent with Parts III.A, VI.D.4.d, and VI.D.10 of the LA County MS4 Permit to prevent or eliminate non-stormwater discharges to the MS4 that are a source of pollutants from the MS4 to receiving waters".
Appendix B-1 Section 2		Appendix B-1 Section 2 and Appendix E Section 3.1.1 of the draft EWMP gives a list of regional EWMP projects. Clarify which of the 11 signature projects the Group is committed to implementing.
Enhanced Watershed Management Program Provisions		
	Part VI.C.1.g (page 49)	The revised EWMP must elaborate on what benefits the regional projects achieve (e.g., flood control, water supply, etc.).
	Part VI.C.1.g.ii (page 49)	The revised EWMP must specify if it incorporated applicable State agency input on priority setting and other key implementation issues or if any State agency priorities are addressed (e.g., drought response, increased capture of stormwater for beneficial use per the Recycled Water Policy, Strategic Plan priorities, California Water Action Plan priorities, etc.). If so, elaborate.
	Part VI.C.1.g.vi (page 50)	The draft EWMP must state if the cost analysis done in the EWMP maximizes the effectiveness of funds through the analysis of alternatives and the selection and sequencing of actions needed to address human health and water quality related challenges and non-compliance. If so, elaborate.
Section 7.3	Part VI.C.1.g.ix (page 50)	<p>Section 7.3 of the draft EWMP should provide the amount and source of current monetary funds available to achieve the BMPs proposed for the 2017 milestone, which is in the current permit cycle.</p> <p>The draft EWMP should also document the total existing allocation for stormwater management for each Permittee in the EWMP and the source of the funds, as well as identify the secured funds that will be used to meet EWMP commitments within the remainder of this permit term, and how any deficit in funds to meet commitments in this permit term will be addressed.</p>
Section 7.3	Part VI.C.1.g.ix (page 50)	For the potential funding sources listed in Section 7.3, specify requirements and application deadlines if applicable and available. Additionally, elaborate on the challenges (if any)/feasibility of obtaining the potential sources of funding.
Section 7.3.5	Part VI.C.1.g.ix (page 50)	<p>The financial strategy discussed in Section 7.3 of the draft EWMP should be elaborated upon. Section 7.3.5 of the revised EWMP should include the following:</p> <ul style="list-style-type: none"> • A prioritization process for obtaining funding that includes the selection of financing strategies that best fit the Groups' needs (e.g., step 1: apply for X grants, step 2: apply for loans, etc.). • A timeline to search for funding with consideration of the

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>milestones indicated in the EWMP.</p> <ul style="list-style-type: none"> • Articulation of who is responsible for seeking funding (e.g., the lead Permittee, all the group members). If most or all Group members will be seeking funding, please specify the responsibilities of those members. <p>It should also outline steps toward, for example:</p> <ul style="list-style-type: none"> • development of a stormwater Capital Improvement Plan and/or asset management plan, • integration of proposed EWMP projects with other street/sewer/water CIPs and asset management plans (e.g., Pavement Management Systems, etc.) • establishing a constant revenue stream for the stormwater CIP/asset management plan, which may include rate studies.
Reasonable Assurance Analysis (RAA)		
Table 4-3	Part VI.C.5.b.iv.(5) (page 65)	<p>Address the following comments for Table 4-3 of the draft EWMP:</p> <ul style="list-style-type: none"> • Add a footnote to legacy pollutants explaining that those constituents are being modeled as TSS. • 144.57 µg/L is listed under dry weather for zinc and the same is listed for wet weather where the source for the number is a TMDL. However, note that there is no dry weather WLA for zinc. Please clarify and/or correct as necessary the RAA target for zinc in dry weather conditions per the CTR. • For the legacy pollutants listed, please use a footnote to explain how the annual sediment reduction is calculated. • Add a footnote to clarify the RAA targets for lead (81.34 and 96.99 ug/L) are applied to San Gabriel Reach 2 (inclusive of its tributaries) and Coyote Creek, respectively. <p>In general, the way information is presented in Table 4-3 of the EWMP is very confusing where there are multiple rows for each pollutant and it is unclear which targets apply to which assessment area and in what weather condition. Additionally, copper has different WLAs depending on the weather and the waterbody, which Table 4-3 does not seem to fully account for. For clarification purposes, modify the table to clearly present all the information currently in the table (e.g., divide Table 4-3 into 2 tables where one addresses metals and is modified to clarify waterbody-specific targets and the 2nd table maintains the same current formatting but covers bacteria, nutrients, and legacy pollutants). Note that modifying the table may resolve some of the comments in bullets above.</p>
Table 4-3		Table 4-3, footnote 2, states that “dry weather target based on 30-day geometric mean WQO while wet weather target is based on

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<p>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 the SGR Bacteria TMDL includes WLAs assigned to MS4 discharges, applicable in dry weather, that are based on a single sample maximum threshold, as well as the geometric mean limitation.</p>
	<p>Part VI.C.5.b.iv.(5) (page 65)</p>	<p>Table 4-3 of the draft EWMP gives RAA results of required pollutant load reductions for some constituents. Section 5.3 of the draft EWMP gives a schedule of milestones and structural BMP capacity (acre-feet) that will be achieved. However, a table must be provided listing the constituents, milestones, and the pollutant load and/or volume reductions (%) that will be achieved through the watershed control measures proposed in the EWMP for the purpose of comparing the modeled RAA pollutant load reductions required with what pollutant load reductions the proposed watershed control measures will actually achieve.</p>
<p>Figure 4-5</p>	<p>Part VI.C.5.b.iv.(5) (page 65)</p>	<p>Figure 4-5 of the draft EWMP gives a map of Zinc Exceedance Volumes for each of the 258 Subwatersheds (end-of-pipe) in the Upper San Gabriel River EWMP area. Likewise, provide a similar map for the City of West Covina in Appendix E of the draft EWMP.</p>
	<p>Part VI.C.5.b.iv.(5) (page 65)</p>	<p>See additional comments on the RAA 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 San Gabriel River Enhanced Watershed Management Program (EWMP)

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

This memorandum contains the comments on Section 4, Reasonable Assurance Analysis (RAA) in the draft Enhanced Watershed Management Program (EWMP) for the Upper San Gabriel River EWMP Group dated June 2015.

1. The model results of hydrology calibration as shown in Table 4-1 indicate that the performance of the model relative to storm volume is good to very good. The difference in modeled and observed values of annual volume, however, is -24.8% for San Jose Channel. Please provide an explanation regarding why the model may be under-predicting annual volume at this location, and identify data that will be collected over the next several years that could potentially improve model performance in terms of annual volume at this location (e.g., more refined POTW discharge data). In addition, for the water quality calibration, the differences in modeled and observed values for total lead and E. coli are in the “fair” tolerance range. While the model is over-predicting total lead, it is under-predicting E. coli load. Please identify the data that will be collected over the next several years that could potentially improve model performance in terms of predicting E. coli load as well as total lead load.
2. 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 4.2.3.1. 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 demonstrate that the EV approach is protective relative to other metrics including the 90th percentile pollutant load.
3. In addition to the EV statistics, please also provide the model results of the baseline condition in terms of runoff volume, pollutant concentration, and pollutant loadings based on the 90th percentile critical condition of runoff volume and pollutant concentration at each subbasin for each limiting pollutant. In addition, please provide the estimated allowable loads and required load reductions on a pollutant-by-pollutant basis.
4. In section 4, Table 4-6, summary statistics of percent reduction are provided, however, the numbers used to arrive at calculating the percentages are not easily identifiable. Per the RAA Guidelines, the model results for the proposed control measures and potential BMPs should be provided to demonstrate the cumulative effectiveness of the proposed BMPs relative to the required pollutant load reductions and load reduction goals as described in Appendix C-4 and presented in Table C-4-8.

5. Finally, please provide an example validation for a representative waterbody within the USGR 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, the RWLs will be achieved.

Upper San Gabriel River EWMP Group

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