

Draft Watershed Management Program Review and Evaluation Questions

1	<p><i>Part VI.C.5.a.i. Water Quality Characterization (p. 58)ⁱ</i></p> <p>Does the plan evaluate existing water quality conditions, including characterization of stormwater and non-stormwater discharges from the MS4 as well as receiving water quality to support identification and prioritization / sequencing of management actions based on available data? What data were used, e.g., wet and dry weather ME monitoring per 2001 Permit, TMDL monitoring, bioassessment monitoring data. Check Attachment E, Table E-1 for approved TMDL monitoring programs. Does the plan include all available data? Were the monitoring stations used appropriately representative of the MS4 discharges of the Permittee(s), i.e., were they adjacent to, or d/s of, the MS4 discharges of the Permittee(s)?</p>
2	<p><i>Part VI.C.5.a.ii. Waterbody-Pollutant Classification (page 59)</i></p> <p>Does the plan identify the water quality priorities within each WMA for Categories 1, 2 and 3, which will be addressed by the Watershed Management Program?</p>
3	<p><i>Category 1 WBPCs</i></p> <p>Does the plan identify waterbody-pollutant combinations (WBPCs) for which water quality-based effluent limitations and/or receiving water limitations are established in Part VI.E and the applicable Attachments L - R? Check Attachment K and the appropriate Attachments L – R for Category 1 WBPCs. [<i>Part VI.C.5.a.ii.(1), page 59</i>]</p> <p>Does the plan clearly specify all applicable interim and final numeric WQBELs (for both dry weather and wet weather, where applicable) for Category 1 WBPCs?</p>
4	<p><i>Category 2 WBPCs</i></p> <p>Does the plan identify pollutants for which data indicate water quality impairment in the receiving water according to the State’s Water Quality Control Policy for Developing California’s Clean Water Act Section 303(d) List (State Listing Policy) and for which MS4 discharges may be causing or contributing to the impairment? Check 303(d) List and Water Quality Characterization for Category 2 WBPCs. [<i>Part VI.C.5.a.ii.(2), page 59</i>]</p> <p>Does the plan clearly specify all applicable Receiving Water Limitations for Category 2 WBPCs?</p>
5	<p><i>Category 3 WBPCs</i></p> <p>Does the plan identify pollutants for which there are insufficient data to indicate water quality impairment in the receiving water according to the State’s Listing Policy, but which exceed applicable receiving water limitations contained in this Order and for which MS4 discharges may be causing or contribution to the exceedance? Check Water Quality Characterization for other Category 2 WBPCs and Category 3 WBPCs. [<i>Part VI.C.5.a.ii.(3), page 59</i>]</p> <p>Does the plan clearly specify all applicable Receiving Water Limitations for Category 3 WBPCs?</p>
6	<p><i>Part VI.C.5.a.iii. Source Assessment (page 59-60)</i></p> <p>Does the plan make findings from the Permittee(s)’ IC/IDE programs, Industrial/Commercial Facilities Pollutant Control programs, Development Construction programs, Public Agency Activities programs regarding known and suspected stormwater and non-stormwater</p>

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	pollutant sources in discharges to the MS4 and from the MS4 to receiving waters and any other stressors related to MS4 discharges causing or contributing to the water quality priorities? <i>[Part VI.C.5.a.iii.(1)(a)(i)-(iv), pages 59-60]</i>
7	Does the plan include data and conclusions from TMDL source investigations regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters? <i>[Part VI.C.5.a.iii.(1)(a)(v), page 60]</i>
8	Does the plan include 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? Check TMDL Staff Report(s); TMDL Implementation Plan(s) and supporting documents (e.g. Quantitative Analysis Report(s)), if developed (see TMDL Reporting Requirements in Attachment E, Part XIX, pages E-45 to E-62); and other watershed management plans (e.g., City of Torrance) as well as RAA <i>[Part VI.C.5.a.iii.(1)(a)(vi), page 60]</i>
9	Does the plan include 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? See Water Quality Characterization step, above. Does the plan include an evaluation of applicable ME monitoring data, tributary monitoring data, and TMDL monitoring data? <i>[Part VI.C.5.a.iii.(1)(a)(vii), page 60]</i>
10	Does the plan include a map(s) of the Permittee(s)' MS4, including all major outfalls and major structural controls for stormwater and non-stormwater (e.g., regional retention/detention basins, LFDs) <i>[Part VI.C.5.a.iii.(1)(b), page 60]</i>
11	<i>Part VI.C.5.a.iv. Prioritization (page 60)</i> Does the plan clearly prioritize the WBPCs according to: (1) those with TMDLs and compliance deadlines that (a) have already passed (and the WQBEL has not been achieved) or (b) are within the permit term; (2) those causing impairment of the receiving water per the State's listing policy and which may be resulting from MS4 discharges (but for which there is not a TMDL); and (3) those causing exceedances of RWLs and which may be resulting from MS4 discharges?
12	<i>Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64)</i> Does the plan specify a strategy to implement pollutant controls necessary to achieve water quality-based effluent limitations and/or receiving water limitations by the interim and/or final compliance deadlines within the permit term? <i>[Part VI.C.5.a.iv.(1), page 60]</i>
13	Does the plan specify a strategy to implement pollutant controls necessary to achieve water quality-based effluent limitations and/or receiving water limitations with compliance deadlines that have already passed and limitations have not been achieved? (Note that if a strategy has instead been included through a TSO and associated Pollution Prevention Plan then the TSO and PPP can just be referenced.) <i>[Part VI.C.5.a.iv.(1), page 60]</i>
14	Does the plan specify a strategy for controlling pollutants for which data indicate impairment or exceedances of receiving water limitations in the receiving water and the findings from the source assessment implicates discharges from the MS4 are the cause that is sufficient to achieve RWLs as soon as possible? <i>[Part VI.C.5.a.iv.(2)(a), page 60]</i>
15	Does the plan specify a strategy consistent with Parts III.A and VI.D.10 to prevent or eliminate non-stormwater discharges to the MS4 that are a source of pollutants from the MS4 to receiving waters?

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	<p>Does the plan specify measurable milestones within the permit term (specific actions, outcomes and deadlines)?</p> <p><i>[Part VI.C.5.b.ii.(1), page 61]</i></p>
16	<p>Does the plan identify potential modifications that will address watershed priorities for the Development Construction Program? Are the modifications sufficiently clear and precise, and does each action include a time schedule? If no modifications are proposed, does the plan explicitly state that the standard permit provisions will be implemented? <i>[Part VI.C.5.b.iv.(1)(a)(i), page 62]</i></p>
17	<p>Does the plan identify potential modifications that will address watershed priorities for the Industrial/Commercial Facilities Pollutant Control Program? Are the modifications sufficiently clear and precise, and does each action include a time schedule? If no modifications are proposed, does the plan explicitly state that the standard permit provisions will be implemented? <i>[Part VI.C.5.b.iv.(1)(a)(ii), page 62]</i></p>
18	<p>Does the plan identify potential modifications that will address watershed priorities for the Illicit Connection and Illicit Discharges Detection and Elimination Program? Are the modifications sufficiently clear and precise, and does each action include a time schedule? If no modifications are proposed, does the plan explicitly state that the standard permit provisions will be implemented? <i>[Part VI.C.5.b.iv.(1)(a)(iii), page 62]</i></p>
19	<p>Does the plan identify potential modifications that will address watershed priorities for the Public Agency Activities Program? Are the modifications sufficiently clear and precise, and does each action include a time schedule? If no modifications are proposed, does the plan explicitly state that the standard permit provisions will be implemented? <i>[Part VI.C.5.b.iv.(1)(a)(iv), page 62]</i></p>
20	<p>Does the plan identify potential modifications that will address watershed priorities for the Public Information and Participation Program? Are the modifications sufficiently clear and precise, and does each action include a time schedule? If no modifications are proposed, does the plan explicitly state that the standard permit provisions will be implemented? <i>[Part VI.C.5.b.iv.(1)(a)(v), page 62]</i></p>
21	<p>Does the plan propose to eliminate a control measure identified in Parts VI.D.4, VI.D.5, VI.D.6 and VI.D.8 to VI.D.10 because that specific control measure is not applicable to the Permittee(s)? <i>[Part VI.C.5.b.iv.(1)(c), page 62]</i></p>
22	<p>If the plan proposes to eliminate a control measure identified in Parts VI.D.4, VI.D.5, VI.D.6 and VI.D.8 to VI.D.10, did the Permittee(s) provide a justification for its elimination? Check that justification is supported by appropriate documentation/analysis. <i>[Part VI.C.5.b.iv.(1)(c), page 62]</i></p>
23	<p>Does the plan compile/incorporate control measures that have been identified in TMDLs and corresponding implementation plans? Check with TMDL staff for available implementation plans. <i>[Part VI.C.5.b.iv.(3), page 62]</i></p>
24	<p>Does the plan evaluate and identify control measures to achieve water quality-based effluent limitations and/or receiving water limitations established in this Order pursuant to all applicable TMDLs? <i>[Part VI.C.5.b.iv.(4)(a), page 63]</i></p>
25	<p>Does the plan provide the necessary specificity with regard to structural & non-structural BMPs, including the extent or number, type, and general location(s) or other metrics, etc. adequate to assess compliance? <i>[Part VI.C.5.b.iv.(4)(b)-(c), page 63]</i></p>
26	<p>Does the Plan include interim milestones and dates for the implementation of each structural control and non-structural best management practice to ensure that TMDL</p>

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	compliance deadlines will be met? <i>[Part VI.C.5.b.iv.(4)(d), page 63]</i>
27	Does the plan clearly identify the responsibilities of each participating Permittee for implementation of watershed control measures? <i>[Part VI.C.5.b.iv.(4)(e), page 63]</i>
28	Did Permittees conduct a Reasonable Assurance Analysis consistent with the Regional Water Board's RAA guidelines for each water body-pollutant combination addressed by the Watershed Management Program? If not, does the plan provide justification and supporting documentation for not including a WBPC? <i>[Part VI.C.5.b.iv.(5), page 63]</i>
29	For water body-pollutant combinations not addressed by TMDLs, does the plan demonstrate using the RAA that the activities and control measures to be implemented will achieve applicable receiving water limitations as soon as possible? <i>[Part VI.C.5.b.iv.(5)(c), page 64]</i>
30	Did the Permittees provide documentation that they have the necessary legal authority to implement the Watershed Control Measures identified in the plan, or that other legal authority exists to compel implementation of the Watershed Control Measures? <i>[Part VI.C.5.b.iv.(6), page 64]</i>
31	Did the Plan incorporate the compliance schedules in Attachments L through R into the plan and, where necessary develop interim milestones and dates for their achievement? <i>[Part VI.C.5.c, page 64]</i>
32	Does the plan describe the adaptive management process that will be undertaken? <i>[Part VI.C.8, pages 66-67]</i>

Summary of Evaluation Questions for Reasonable Assurance Analysis (RAA)

Refer to LA County MS4 Permit Part VI.C.5 and Guidelines for Conducting Reasonable Assurance Analysis in a Watershed Management Program, Including an Enhanced Watershed Management Program (March 25, 2015)

- Did Permittees conduct an RAA consistent with the Regional Water Board's RAA guidelines for each WBPC (Category 1, 2, & 3 pollutants) addressed in the WMP? If not, does the WMP provide justification and supporting documentation for not including an RAA?
- For WBPCs not addressed by TMDLs, does the WMP demonstrate using the RAA that the activities and control measures to be implemented will achieve applicable RWLs as soon as possible?
- Were appropriate critical conditions analyzed?
- Were model input parameters consistent with RAA guidelines?
- Appropriate calibration?
- If a limiting pollutant was selected for analysis, was there adequate justification?
- Required pollutant load reductions (%)?

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- Pollutant load reductions (%) proposed from structural BMPs?
- Was a volume-retention-based approach proposed?
 - Structural BMPs or regional projects?
 - BMP details provided (i.e. description, extent/general location, capture volume, etc.)?
- Where non-structural BMPs/source control Watershed Control Measures were relied upon, was there adequate justification for the anticipated pollutant reduction from these measures?
 - Reductions (%) assumed for Minimum Control Measures (MCMs)/Non- Structural BMPs?
- Were watershed control measures evaluated against interim effluent limitations with deadlines in this permit term? Next permit term?
- Did the RAA demonstrate that effluent limitations with deadlines in the current permit term, and next permit term, could be met by the watershed control measures?

ⁱ References throughout are to provisions of the Los Angeles County MS4 Permit (Order No. R4-2012-0175)