

#	EWMP Reference/ MS4 Permit Provision	Comment and Necessary Revision	Response to Comments
<b>General</b>			
1	Definitions, Acronyms, and Abbreviations	<i>Ensure that definitions are consistent with those in Attachment A of the 2012 LA County MS4 Permit.</i>	All definitions, acronyms, and abbreviations have been updated to be consistent with those provided in Attachment A of the MS4 Permit.
2	Section 1	<i>Note that the purpose the LA County MS4 Permit and of the EWMPs is broader than acknowledged in Sections 1.1 and 1.5.2 of the draft EWMP. Align description of the purpose of the EWMP with Part VI.C.1 of the permit.</i>	Sections 1.1 and 1.5.2 have been updated to align with Part VI.C.1 of the MS4 Permit.
3	Section 1.7	<i>Define the Group's use of the phrase "iterative process" under Adaptive Management, or revise to specify an "adaptive management process".</i>	In order to maintain consistency, Section 1.7 revised to reference the "adaptive management process" rather than the "iterative process."
4	Section 2.2, Footnote 3	<i>Footnote 3 on page 2-6 of the EWMP states that, "As recognized by the footnote in Attachment K-4 of the MS4 Permit, the Peninsula WMG members have entered into an Amended Consent Decree with the United States and the State of California, including the Regional Board, pursuant to which the Regional Board has released the Peninsula WMG members from responsibility for Toxic pollutants in the Dominguez Channel and the Greater Los Angeles and Long Beach Harbors. Accordingly, no inference should be drawn from the submission of this EWMP Work Plan or from any action or implementation taken pursuant to it that the Peninsula WMG members are obligated to implement the DC Toxics TMDL, including this EWMP Work Plan or any of the DC Toxics TMDL's other obligations or plans, or that the Peninsula WMG has waived any rights under the Amended Consent Decree." Revise Footnote 3 on page 2-6 of the EWMP to omit the strike out portion of the sentence: "Accordingly, no inference should be drawn from the submission of this EWMP or from any action or implementation taken pursuant to it that the Peninsula WMG members are obligated to implement the DC Toxics TMDL, including this EWMP Work Plan or any of the DC Toxics TMDL's other obligations or plans, or that the Peninsula WMG has waived any rights under the Amended Consent Decree".</i>	Suggested revision incorporated.
5	Section 3.2	<i>A summary of existing and planned Regional BMPs within the Peninsula EWMP area is summarized in Figure 3-1 and Table 3-4. Section 3.2.4.2.3 includes a description of the evaluation process that the group undertook to identify opportunities for regional, multi-benefit stormwater retention projects capable of retaining the volume associated with the 85th percentile, 24-hour storm event for the Palos Verdes Peninsula, which resulted in the projects identified in Figure 3-1 and Table 3-4. Include in this description, the storm event size corresponding to the 85<sup>th</sup> percentile, 24-hour event for the Palos Verdes Peninsula WMG area. Also, include a discussion of drainage areas and/or any projects that were initially identified, but ultimately not proposed due to project constraints.</i>	A Technical Memorandum was developed in November 2014 which contains all the information requested. This has been included with the EWMP as Appendix 5 titled "Potential Regional BMP Locations Technical Memorandum."

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6	Section 3.2.4.2	<p><i>The EWMP provides list of existing/planned/proposed regional BMPs and some basic information in Section 3.2.4.2. Casaba Estates Subdivision and the Western Drainage area of the Chandler Quarry Project appear to be the only regional projects that will retain and infiltrate runoff in a volume greater than the 85<sup>th</sup> percentile, 24-hr storm event. Confirm. Also, clarify for the other planned/proposed regional BMPs the amount of runoff that will be retained relative to the 85<sup>th</sup> percentile, 24-hour storm event for specific drainage areas tributary to the projects. Also, clarify for each whether the regional project is capable of retaining all nonstorm water runoff for the drainage areas tributary to the projects.</i></p>	<p>The Casaba Estates, Chandler Quarry Western Drainage area, and the Eastview Park projects are all designed to retain and infiltrate a volume greater than the volume generated from the 85<sup>th</sup> percentile, 24-hr storm. To clarify, Eastview Park was designed for the 1.25-inch storm, which is larger than the 85<sup>th</sup> percentile storm (approximately 0.85-inch). Clarification has been added to Section 3.2.4.2 (Regional BMPs) to this effect.</p> <p>The majority of the Peninsula WMG Area is effectively prevented from implementing large scale infiltration projects due to the presence of geotechnical hazards, specifically land subsidence, and lack of available space.</p> <p>Additionally, the Machado Lake Watershed is held to very low WQBELs, particularly for phosphorus. Because of the low WQBELs, traditional biofiltration BMPs would not satisfy the reductions necessary to meet the TMDL limits. As a result, the potentially feasible projects that could be implemented in this area are large scale, flow-through treatment projects, such as a treatment facility with storage or a sub-surface flow wetland (SSF wetland). Explanations regarding the Peninsula's constraints were previously provided in Section 3.2.4.2 (Regional BMPs).</p> <p>All proposed regional BMPs will either retain or capture and treat water up to the design storm specified for that project, including nonstormwater flows during dry weather.</p>
<b>Water Body Pollutant Classification and Prioritization</b>			
7	Section 2.1; Table 2-1	<p><i>Revise Table 2-1 to remove redundant pollutant listings (e.g., PCBs and DDTs are thrice listed under Category 1, while chlordane is twice listed under Category 1).</i></p>	<p>All redundancies found in Table 2-1 have been consolidated.</p>
8	Section 2.2	<p><i>Section 2.2 Water Quality Characterization only includes summary of pollutants listed in existing TMDLs and 303(d) listings. The prioritization process lists water body pollutants into Categories 1 and 2 only. Data and a justification must be added to this section to clarify why Category 3 WBPCs were not identified. (See information provided in Appendix 5. RAA Summary – Table 1, page 4.)</i></p>	<p>Since recent receiving water monitoring data are not currently available from within the Peninsula EWMP Area for pollutants not already categorized as Category 1 or 2, there were no Category 3 (Medium Priority) pollutants identified during the Waterbody Pollutant Categorization; however, monitoring conducted under the Coordinated Integrated Monitoring Plan (CIMP) will be used to identify if there are additional pollutants of concern within the Peninsula EWMP watersheds.</p> <p>An explanation to this effect was previously provided in Section 2.1, page 2-4; however, in the interest of providing clarity, additional language has been added to Section 2.2.3 (Receiving Water Characterization).</p>
9	Section 2.2.3, Table 2-5	<p><i>Table 2-5, which lists the water bodies and beneficial uses within the area addressed by the PV Peninsula EWMP Group needs to include "Coastal Streams of Palos Verdes," "Canyon Streams of Palos Verdes," and "Point Vicente Beach." In addition, the revised EWMP needs to clarify if the first row "Los Angeles Coastal" is referring to the "Nearshore Zone" or the "Offshore Zone." Both the Los Angeles County Coastal Nearshore Zone and the Los Angeles County Coastal Offshore Zone have designated REC1 and REC2 beneficial uses (BUs) as listed in Table 2-1a of the Water Quality Control Plan, Los Angeles Region (Basin Plan) and additional BUs as listed in Table 2-3 of the Basin Plan, and both should be included in Table 2-5.</i></p>	<p>Table 2-5 of the EWMP has been updated accordingly. Note that the Basin Plan lists Point Vicente Beach as Port Vicente Beach. This has been assumed to be a typographical error.</p>

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<b>Selection of Watershed Control Measures</b>			
10	Section 3.1.3.1	<p><i>The EWMP states, "This provision [MS4 Permit §VI.D.9.h.vii.(1)] will be supplanted by the statewide trash amendments" (pg. 3-5). Note, however, that the statewide trash amendments are not selfimplementing, and will therefore need to be incorporated into the LA County MS4 Permit before other related provisions are supplanted by the statewide amendments. Depending on the timing of final approvals of the trash amendments, their incorporation into the LA County MS4 Permit may not occur prior to the deadline to install trash excluders per Part VI.D.9.h.vii.(1). Therefore, the EWMP must include milestones and a schedule for installing trash excluders per the LA County MS4 Permit in the subwatershed area not addressed by a trash TMDL (i.e., the Los Angeles Harbor Subwatershed).</i></p>	<p>The Peninsula WMG does not contain any Priority A area catch basins or outfalls and is therefore not mandated by the MS4 Permit to install trash excluders in catch basins not in areas subject to a Trash TMDL.</p> <p>Additionally, according to the Trash Amendment Staff Report, the Peninsula WMG does not contain any priority land use areas of high density residential, industrial, commercial, mixed urban and public transportation station.</p> <p>Therefore, the Peninsula WMG is not required to install trash excluders in catch basins not in areas subject to a Trash TMDL.</p> <p>An explanation to this effect has been provided in Section 3.1.3.1.</p>
11	Section 3.2.4.2.3	<p><i>Provide interim milestones and dates for their achievement to complete investigations of feasibility, cost-effectiveness and design for each proposed regional BMP in Section 3.2.4.2.3, in addition to the anticipated implementation dates provided in Table 5-4.</i></p>	<p>These dates have been incorporated into the EWMP. Please refer to Section 5.</p>
12	Appendix 5, Section 4.3; and Section 3.2.2	<p><i>For each of the regional BMPs, articulate, and quantify where possible, the anticipated multiple benefits that will derive from the project with greater specificity than provided in Section 4.3.</i></p> <p><i>For the Green Building Ordinance implemented by Rancho Palos Verdes (pg. 3-23), articulate the specific water quality related components/benefits of the ordinance.</i></p>	<p>Applicable multiple benefits have been added to the descriptions provided for each Regional BMP in Section 3.2.4.2.</p> <p>Additionally, specific stormwater quality aspects of the Green Building Ordinance have been identified in Section 3.2.2</p>
13	Section 5.2.1	<p><i>Greater detail, including interim milestones and dates for their achievement, must be provided in the EWMP for each of the Planned Non-structural TCMs. The EWMP must indicate interim milestones and dates for their achievement for each Permittee in the WMG that will be implementing the planned non-structural TCM. For example, interim milestones and dates for their achievement should be included for:</i></p> <ul style="list-style-type: none"> <li>• <i>Municipal Landscape Retrofit Programs</i></li> <li>• <i>Downspout Disconnect Programs</i></li> <li>• <i>Private Road and Parking Lot Sweeping Ordinances</i></li> <li>• <i>Clean Bay Restaurant Certification Programs (in Palos Verdes Estates &amp; Rolling Hills Estates)</i></li> <li>• <i>Xeriscaping &amp; Turf Conversion Incentive Programs</i></li> <li>• <i>Erosion Repair and Slope Stabilization Programs</i></li> </ul>	<p>Implementation dates have been provided in Section 3.2.2 for each Non-structural TCM that is indicated as Planned in Table 3-3.</p>
14	Section 5	<p><i>The EWMP must more clearly link implementation milestones and schedules for Structural and Non-structural TCMs with TMDL compliance schedules.</i></p> <p><i>Additionally, the EWMP only includes final milestones for existing/planned BMPs (see Table 5-4, pg. 5-12). Table 5-4 should indicate which subwatershed each regional project will address, as done in Table 3-4, and indicate the TMDL deadline that the project is targeted to address (from Table 5-2).</i></p>	<p>The schedules for implementation of all Non-structural TCMs have been added to Section 3 and are all prior to the soonest TMDL final compliance deadline of September 2018.</p> <p>Additionally, Table 5-4 (<i>Structural TCM Implementation Schedule</i>) has been updated to include interim dates, targeted compliance milestones, and subwatersheds for each regional project.</p>

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15	Section 5.2	<p><i>The revised EWMP must specify a strategy to implement pollutant controls necessary to achieve bacteria WQBELs that have already passed (2012) and limitations have not been achieved (see data shown in Table 2-9, page 2-16).</i></p>	<p>This comment suggests that the bacteria WQBELs in Santa Monica Bay have not been achieved, which appears to have been a result of the data shown in Table 2-9 of the EWMP.</p> <p>Although the table shows some exceedances above the allowable exceedance days, they are infrequent. In addition, when beach investigations have been conducted, there is no data to indicate these exceedances were caused by contributions from the MS4.</p> <p>The rare dry weather exceedances of the bacterial objectives at SMB 7-1, 7-3, and 7-5 shown in <b>Error! Reference source not found.</b> of the EWMP are likely attributed to natural causes, including, but not limited to: the presence of recreational swimmers, ocean debris, birds, animal carcasses (i.e. birds, marine mammals, etc.), heavy surf, increased wave height, and wind speed. Site SMB 7-3 is also directly adjacent to the Terranea Resort in Rancho Palos Verdes. Furthermore, all five sites within the Peninsula WMG are 100% in compliance with wet weather limits during the same time period. These factors suggest that the MS4 is likely not causing or contributing to dry weather exceedances.</p> <p>Additionally, the Peninsula WMG sites are in an anti-degradation condition. The Peninsula WMG monitoring sites historically experience fewer exceedance days than the reference beach (Leo Carrillo) used in the TMDL. This is consistent with the TMDL's approach that acknowledges that historic average wet weather bacteria exceedance rates for each of these subwatersheds are lower than that of the reference beach. Historic wet weather monitoring data at these five sampling locations confirms this understanding, as the long-term exceedance rate at all five sites varies between 4 and 10%, well below the long-term wet weather exceedance rate at the reference beach (26%). In addition, Heal the Bay, which comprehensively analyzes coastline water quality in California, assigning A to F grades based on bacteria-related health risks, consistently awards these beaches an "A+" ranking on its Beach Report Card (Heal the Bay, 2015).</p> <p>Although it is unlikely that the MS4 is causing or contributing to bacteria exceedances, the RAA estimates an additional 10-12% reduction in bacteria loading during wet weather based on non-structural BMPs, Low Impact Development (LID), and downspout disconnection programs for single family residential homeowners. Although it has not been quantified through the RAA, these control measures will also address dry weather conditions. Additional actions to reduce loading during dry weather will include: execution of the non-stormwater screening and monitoring program (already underway) and implementation of the active illicit discharge identification program required by the new MCMs.</p> <p>Further clarification has been included in Section 2.2.3 of the EWMP.</p>

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<b>Enhanced Watershed Management Program Provisions</b>			
16	MS4 Permit, Part VI.C.5.b.iv.(4) (e), page 65	<i>The revised EWMP must identify each participating Permittee responsible for implementing the existing/ planned/or proposed BMPs (see tables 3-4 and 5-4). In Table 5-4, clarify whether the Permittees identified in the column "Jurisdiction" will be wholly responsible for the structural TCM or if all Permittees listed in the column "Percent Drainage Area Per Jurisdiction" will share responsibility for implementing the structural TCM.</i>	<p>The regional projects as currently proposed need to go through preliminary engineering studies as well as other feasibility, ownership/easement, and environmental review before more accurate cost estimates can be arrived at to the level of certainty that is needed for the governing boards. This is not something that can be determined prior to EWMP approval.</p> <p>Additionally, in order for public agencies to approve funding for these projects, the plan would first need to be approved by the regulatory body, then each agency will need to provide their governing boards with a clear understanding of what the financial commitment would ultimately be and the timing/schedule of those disbursements.</p> <p>Although a definitive cost structure cannot be identified at this time, a schedule by which each study can be undertaken has been developed and provided in Section 5.</p>
17	MS4 Permit, Part VI.C.5.b.iv.(5) (c), page 65	<i>For Category 2 WBPCs, the revised EWMP does not demonstrate that the watershed control measures to be implemented will achieve applicable receiving water limitations as soon as possible. The revised EWMP must provide appropriate justification for the proposed BMP implementation schedule for Category 2 WBPCs.</i>	<p>As described in Appendix 6 (RAA Memorandum), a controlling pollutant was selected for each analysis region. The controlling pollutants were selected to be the pollutants for which the most reductions are necessary to comply with the WQBELs. Category 2 WBPCs will be addressed by the selected TCMs for each analysis region. Wilmington Drain is listed as impaired for Copper Lead and Bacteria, all of which will be addressed through the Palos Verdes Landfill and Valmonte Regional BMPs. Also, although not analyzed, San Ramon Canyon is anticipated to address Sediment Toxicity.</p> <p>In addition, the Nonstructural TCMs are anticipated to address various pollutants, including Category 2 WBPCs. Table 3-4 (Anticipated Pollutants to be addressed through Nonstructural TCMs) has been added to reflect as such.</p> <p>More precise implementation schedules have been included in the EWMP to address both Category 1 and Category 2 pollutants.</p>
18	MS4 Permit, Part VI.C.5.c, page 66	<i>The revised EWMP must incorporate interim milestones and dates for their achievement for structural and non-structural TCMs that will allow an assessment of progress during each adaptive management cycle (i.e., every two years). See previous comments.</i>	<p>The schedules for implementation of all Non-structural TCMs have been added to Section 3 and are all prior to the soonest TMDL final compliance deadline of September 2018.</p> <p>Additionally, Table 5-4 (<i>Structural TCM Implementation Schedule</i>) has been updated to include interim dates, targeted compliance milestones, and subwatersheds for each regional project.</p>
19	Sections 3.2.2 and 9 MS4 Permit, Part VI.C.8, pages 68-70	<p><i>In Table 3-3, only Rancho Palos Verdes is identified as committing to enhanced tracking as part of reporting/adaptive management. All Permittees in the WMG must commit to enhanced tracking through the EWMP to support adaptive management (see section 3.2.2 "Reporting/Adaptive Management" and Table 3-3).</i></p> <p><i>Section 9 of the EWMP must also include a commitment to report on the status of multi-year/future regional BMPs, both planned and proposed, and the status of efforts to secure funding for structural TCMs both for capital investments and O&amp;M through the adaptive management process.</i></p>	<p>Although a GIS system is recommended, it is not required for enhanced tracking. Rancho Palos Verdes has committed to utilizing a GIS system while the other agencies may choose to use another version of an electronic tracking system to comply with the reporting/adaptive management requirements of the MS4 Permit. Although this is true, Rancho Palos Verdes will not be receiving any quantified credit for its use of a GIS system. Therefore, this has been removed from Section 3.2.2 and Table 3-3 of the EWMP to avoid misinterpretation.</p> <p>Additional points have been added to Section 9 to reflect suggested language.</p>



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20	MS4 Permit, Part VI.C.1.g.ii (page 49)	<i>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.</i>	This EWMP has incorporated State agency input from various sources on priority setting and implementation issues. Specific priorities incorporated have been described in Section 1.5.4.
21	Section 6 MS4 Permit, Part VI.C.1.g.vi (page 50)	<i>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.</i>	The cost analysis performed maximizes the effectiveness of funds by analyzing the most cost-effective design for each analysis region. This language has been added to Section 6.1.2.  It is assumed that through implementation of the Regional BMPs, as outlined in the RAA, compliance will be achieved. Therefore, an analysis of non-compliance was not performed.
22	Section 6.3 MS4 Permit, Part VI.C.1.g.ix (page 50)	<i>For the potential funding sources included in Section 6.3, specify requirements and application deadlines if applicable and available. Additionally, elaborate on the challenges (if any)/feasibility of obtaining the potential sources of funding.</i>	Requirements and challenges have been added to each funding option, as appropriate. Application deadlines will vary and are dependent on the source.
23	Section 6.3 MS4 Permit, Part VI.C.1.g.ix (page 50)	<p><i>The financial strategy discussed in Section 6.3 of the draft EWMP should include the following:</i></p> <ul style="list-style-type: none"> <li>• <i>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.).</i></li> <li>• <i>A timeline to search for funding with consideration of the milestones indicated in the EWMP.</i></li> <li>• <i>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.</i></li> </ul> <p><i>It should also outline steps toward:</i></p> <ul style="list-style-type: none"> <li>• <i>development of a stormwater Capital Improvement Plan and/or asset management plan,</i></li> <li>• <i>integration of proposed EWMP projects with other street/sewer/water CIPs and asset management plans (e.g., Pavement Management Systems, etc.)</i></li> <li>• <i>steps to establish a constant revenue stream for the stormwater CIP/asset management plan, which may include rate studies.</i></li> </ul>	<p>Section 6.3.3 (Prioritization) has been added to the EWMP which sets funding option priorities for each agency.</p> <p>Although the Peninsula WMG will work together to maximize cost-effectiveness, each individual agency will be responsible for seeking funding for EWMP implementation. This has been described in Section 6.3.</p> <p>Development of a stormwater capital improvement plan for existing public facilities, prioritizing locations for green street features, and updating infrastructure design guidelines with sustainable practices has been included in Section 6.3.3.</p> <p>More detailed timelines, including dates to secure funding, have been included in Section 5.</p>
<b>Reasonable Assurance Analysis (RAA)</b>			
24	Section 4 and Appendix 5 MS4 Permit, Part VI.C.5.b.iv.(5), page 65	<i>The RAA is conducted and included in the EWMP. (Note that Section 4.2 of the EWMP references Appendix 6, but should reference Appendix 5.) See Enclosure 2 for detailed comments on the RAA.</i>	As a result of comment No. 5, an appendix titled "Potential Regional BMP Locations Technical Memorandum" has been added to the EWMP. Therefore, the RAA Memorandum is now Appendix 6. All references have been updated to reflect accurate numbering.

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25	Sections 3.1.3 and 5.2.1	<i>Clarify the assumed load reduction from non-structural BMPs used by the WMG and use a consistent assumption throughout the EWMP. Section 3.1.3 indicates a 5% load reduction from “new and enhanced provisions of the MS4 Permit,” Section 5.2.1 indicates a 7% load reduction from non-structural BMPs, and Appendix 5, Table 11 indicates a 7.5% load reduction.</i>	Per Section 3.1.3 of the EWMP and Appendix 6, there are two separate non-modeled, non-structural load reductions accounted for: 5% load reduction for programmatic load reductions for the MCMs, and 2.5% load reduction for programmatic load reductions for Targeted Control Measures (enhanced MCMs). This additional 2.5% load reduction is explained in Section 3.2.2 of the EWMP. The total non-modeled, non-structural load reduction is therefore assumed to be 7.5%. The language has been updated to clarify this point. The reference in Section 5.2.1 of the EWMP has been updated to 7.5%.
26	Appendix 5, Table 2	<i>Table 2 does not include bacteria in Wilmington Drain. Though it is a Category 2 WBPC, the permit includes Receiving Water Limitations as permit limits for Category 2 and Category 3 WBPCs; therefore, it must be included in Table 2 as well as other Category 2 WBPCs that are included in the RAA. Additionally, footnote 4 (pg. 8) in Appendix 5 must reference the freshwater reference system dataset used in the LA River Bacteria TMDL, not the Arroyo Sequit dataset.</i>	Appendix 6 (RAA Memo), Table 2 has been updated to include fecal coliform for Wilmington Drain. Because Table 2 is a summary of Permit limits for all modeled pollutants (the table title has been revised to clarify this), it does not include other WBPCs that were not modeled (these are included in Section 2 of the EWMP).  Footnote 4 has been updated to reference the LA River Bacteria TMDL and the SCCWRP dataset used therein.
<b>RAA</b>			
27	Appendix 5. Reasonable Assurance Analysis, Section 2.5 Wet Weather Baseline Loads and Target Load Reductions	<i>Target load reductions of zero were set for PCBs and DDT for Santa Monica Bay with the explanation, “In Santa Monica Bay, zero target load reduction was set for PCBs and DDT, consistent with the USEPA TMDL, which sets MS4 waste load allocations based on baseline loads”. The assigned WLAs for DDT and PCBs were 27.08 and 140.25 g/yr, respectively. According to the USEPA TMDL for DDT and PCBs, existing stormwater loads from the watershed are lower than the calculated total allowable loads to achieve sediment targets; therefore, the waste load allocations for stormwater in the TMDL are based on existing load estimates. The Permittees will need to collect data through the Group’s CIMP to confirm that existing stormwater loads from the watershed are lower than the calculated allowable loads to achieve sediment targets.</i>	Understood. The Peninsula WMG has included this monitoring in its CIMP, and will adaptively manage their EWMP as required based on monitoring results. Text has been added to Appendix 6 to state this approach more clearly.
28	RAA Modeling	<i>Provide a graph of the time series results, between 2001 and 2012, of modeled runoff volumes with observed runoff volumes and a statistical analysis of the comparison of modeled and observed values for runoff volume.</i>	A graph has been provided with the requested data in Section 2.4.4.1 of Appendix 6.
29	RAA Modeling	<i>The model results of the baseline condition (loads are included in Table 5 of Appendix 5) in terms of runoff volume and pollutant concentration are not provided in the EWMP report. Per the RAA Guidelines, present the model results of the baseline condition for runoff volume, pollutant concentration and pollutant loadings based on the 90<sup>th</sup> percentile critical condition at each analysis region for each pollutant of concern.</i>	Model results for the baseline condition (Table 5) have been updated to reflect the baseline runoff volume, concentration, and load for the 90th percentile critical condition (TMDL Year 1995).  Detailed output provided electronically in the RAA data folder.
30	RAA Modeling	<i>The estimated allowable loads and required load reductions for each analysis region and each pollutant as provided in Table 5 of the Appendix 5 should be presented in terms of runoff volume, concentration and then pollutant loading.</i>	Table 5 has been revised to include the runoff volume, concentration, and load associated with the allowable conditions. However, it should be noted that for purposes of compliance modeling, only the TLR in terms of load was evaluated. The corresponding runoff volume and concentration are provided for informational purposes only.  Detailed model output for all conditions is provided in the RAA data folder.

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31	RAA Modeling	<p><i>Per the RAA Guidelines, the model results for the proposed control measures and potential BMPs should be provided to demonstrate the effectiveness of the proposed BMPs that would achieve the required pollutant load reductions and load reduction goals. However, as presented, the model results presented in Table 11 of Appendix 5 do not sufficiently demonstrate the effectiveness of the proposed BMPs. As such, the detailed reasonable assurance analysis (RAA) results for the proposed BMPs for each analysis region should be provided in terms of, where applicable: 1) influent volume, concentration and/or load; 2) treated volume, concentration and/or load; and 3) effluent volume, concentration and/or load through BMPs for the selected critical condition to demonstrate the effectiveness of the proposed BMPs.</i></p>	<p>Due to the robust size of the data requested, the runoff/concentration/load values have been included in the RAA data folder for each BMP condition and each analysis region. The text of the EWMP has been revised to direct readers to these data files.</p>
32	RAA Modeling	<p><i>An example illustrating the modeling results of pollutant concentrations in the receiving water for all pollutant of concern at the downstream outlet of the watershed system should be presented in the EWMP to demonstrate the effectiveness of all BMPs in place when compared with those of the baseline condition and to demonstrate the compliance with final water quality limits (WQL) during the critical condition.</i></p>	<p>An example as requested has been included in Attachment C of Appendix 6 (RAA Memo), along with the TLR examples.</p>