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## Los Angeles Regional Water Quality Control Board

October 29, 2015

Permittees of the Rio Hondo / San Gabriel River Water Quality Group<sup>1</sup>  
(See Distribution List)

### **REVIEW OF THE RIO HONDO / SAN GABRIEL RIVER WATER QUALITY 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 Rio Hondo / San Gabriel River Water Quality 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 29, 2015 by the Rio Hondo / San Gabriel River Water Quality 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.

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<sup>1</sup> Permittees of the Rio Hondo / San Gabriel River Water Quality Group EWMP include Cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, the County of Los Angeles, and the Los Angeles County Flood Control District (LACFCD).

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 29, 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 2 letters that contained comments specific to the Group's draft EWMP. These letters were from NRDC/HTB/LAWK and CICWQ. On July 9, 2015, the Board held a workshop at its regularly scheduled Board Meeting on the draft EWMPs. During the review of the draft EWMPs, the Los Angeles Water Board considered those comments applicable to the Group's 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 29, 2016.

The revised EWMP must be submitted to [losangeles@waterboards.ca.gov](mailto:losangeles@waterboards.ca.gov) with the subject line "LA County MS4 Permit – Revised Rio Hondo / San Gabriel River Water Quality Group EWMP" with a copy to [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) and [Deborah.Brandes@waterboards.ca.gov](mailto:Deborah.Brandes@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 L 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 interim and final trash WQBELs and all other final WQBELs and receiving water limitations pursuant to Part VI.E and set forth in Attachments O and P by the applicable compliance deadlines occurring prior to approval of an EWMP.

If you have any questions, please contact Mrs. Deborah Brandes of the Storm Water Permitting Unit by electronic mail at [Deborah.Brandes@waterboards.ca.gov](mailto:Deborah.Brandes@waterboards.ca.gov) or by phone at (213) 576-6688. Alternatively, you may also contact Mr. Ivar Ridgeway, Storm Water Permitting, at [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.  
Executive Officer

Enclosures: Rio Hondo / San Gabriel River Water Quality Group Distribution List  
Enclosure 1 – Comments and Necessary Revisions to Draft EWMP  
Enclosure 2 – Comments on the Reasonable Assurance Analysis

## Rio Hondo / San Gabriel River Water Quality Group EWMP Group

Name	City	Email Address	Position	Phone Number
Dominic Lazzaretto	Arcadia	<a href="mailto:dlazzaretto@ci.arcadia.ca.us">dlazzaretto@ci.arcadia.ca.us</a>	City Manager	626-574-5401
Tom Tait	Arcadia	<a href="mailto:ttait@ci.arcadia.ca.us">ttait@ci.arcadia.ca.us</a>	PW Services Director	626-305-1386
Vanessa Hevener	Arcadia	<a href="mailto:vhevener@ci.arcadia.ca.us">vhevener@ci.arcadia.ca.us</a>	Stormwater Coord/EWMP Rep.	626-305-5327
Tiffany Lee	Arcadia	<a href="mailto:tlee@ci.arcadia.ca.us">tlee@ci.arcadia.ca.us</a>	-	-
*TBD	Azusa	*TBD	City Manager	-
Daniel Bobadilla	Azusa	<a href="mailto:DBobadilla@ci.azusa.ca.us">DBobadilla@ci.azusa.ca.us</a>	Interim Director of Public Works/City	(626) 812-5264
Phillip Flores	Azusa	<a href="mailto:PFlores@ci.azusa.ca.us">PFlores@ci.azusa.ca.us</a>	-	(626) 812-5064
Michelle Keith	Bradbury	<a href="mailto:MKKeith@cityofbradbury.org">MKKeith@cityofbradbury.org</a>	City Manager	(626) 358-3218 ext. 300
David Gilbertson	Bradbury	<a href="mailto:DGilbertson@rkagroup.com">DGilbertson@rkagroup.com</a>	-	(909) 594-9702
Kurt Pedersen	Bradbury	<a href="mailto:kpdersen@rkagroup.com">kpdersen@rkagroup.com</a>	Director of Engineering	(909) 594-9702
Paul Alva	County of Los Angel	<a href="mailto:PALva@dpw.lacounty.gov">PALva@dpw.lacounty.gov</a>	EWMP Rep.	(626) 458-4325
Jolene Guerrero	County of Los Angel	<a href="mailto:jguerrer@dpw.lacounty.gov">jguerrer@dpw.lacounty.gov</a>	-	(626)458-4364
Genevieve Osmeña	County of Los Angel	<a href="mailto:gosmena@dpw.lacounty.gov">gosmena@dpw.lacounty.gov</a>	-	(626) 458-3978
Darrell George	Duarte	<a href="mailto:georged@accessduarte.com">georged@accessduarte.com</a>	City Manager	626-357-7931, ext 223
Craig Hensley	Duarte	<a href="mailto:hensleyc@accessduarte.com">hensleyc@accessduarte.com</a>	Director of Community Development	626-357-7931, ext 232
Rafael Casillas	Duarte	<a href="mailto:rcasillas@accessduarte.com">rcasillas@accessduarte.com</a>	PW Manager	626-357-7931
Oliver Chi	Monrovia	<a href="mailto:Ochi@ci.monrovia.ca.us">Ochi@ci.monrovia.ca.us</a>	Interim City Manager	626-932-5585
Tina Cherry	Monrovia	<a href="mailto:TCherry@ci.monrovia.ca.us">TCherry@ci.monrovia.ca.us</a>	Interim PW Director	626-935-5544
Sharon Gallant	Monrovia	<a href="mailto:SGallant@ci.monrovia.ca.us">SGallant@ci.monrovia.ca.us</a>	Stormwater Coord/EWMP Rep.	626-932-5553
Anthony Ty	Monrovia	<a href="mailto:ATy@ci.monrovia.ca.us">ATy@ci.monrovia.ca.us</a>	-	626-932-5573
Jun Cervantes	Monrovia	<a href="mailto:JCervantes@ci.monrovia.ca.us">JCervantes@ci.monrovia.ca.us</a>	-	626-932-8299
Elaine Aguilar	Sierra Madre	<a href="mailto:eaguilar@cityofsierramadre.com">eaguilar@cityofsierramadre.com</a>	City Manager	626-355-7135
Bruce Inman	Sierra Madre	<a href="mailto:binman@cityofsierramadre.com">binman@cityofsierramadre.com</a>	PW Director	626-355-7135
James Carlson	Sierra Madre	<a href="mailto:jcarlson@cityofsierramadre.com">jcarlson@cityofsierramadre.com</a>	Stormwater Coord/EWMP Rep.	626-355-7135 ext. 803



Los Angeles Regional Water Quality Control Board

Enclosure 1 – Summary of Comments and Necessary Revisions to Draft EWMP

Rio Hondo/San Gabriel River Water Quality Group

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
<b>General</b>		
		The draft EWMP does not consider the Indicator Bacteria in the San Gabriel River, Estuary, and Tributaries TMDL (San Gabriel River 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 (assuming a TMDL effective date of early to mid-2016). Revise the draft EWMP to reference the San Gabriel River Bacteria TMDL, which addresses bacteria impairment in Big Dalton Wash among other waterbodies in the SGR Watershed. For reference, see Basin Plan Amendment Table 7-41.2 footnote 5 and the staff report page 21, 31, and 35.
Figures 4-14 & 4-15, Pages 135-136		Present cumulative values of rainfall and runoff related to the graphs in Figures 4-14 and 4-15 (i.e., the 24-hour storm event size for LAR and SGR, respectively).
Section 1.6		Revise Section 1.6 as the petitions (SWRCB/OCC File Nos. A2236) were resolved by the State Board on June 16, 2015 through its Order WQ 2015-0075. Delete all but the last sentence of the “reservation” included as a contingency in the EWMP while that petition process was underway.
Figure 2-1, page 22	Part VI.C.5.a.iii.(1)(b)	Include MS4 outfall locations on (a) map(s). (Monitoring sites are shown on Figure 2-1, page 22. Planned regional BMPs are seen on page 60. Planned distributed BMPs are on page 62. Potential project sites are on pages 64-65.)
Page 37		The EWMP states that, “Opportunities to implement sediment control BMPs will determine whether it is practicable to achieve the numeric sediment-borne WQOs.” Delete or modify this statement such that the Group commits to implement sediment control BMPs, or use alternative approaches as determined through its adaptive management process, to control discharges of bis (2-ethylhexyl) phthalate from the Permittees’ MS4s that could cause or contribute to exceedances of Receiving Water Limitations.
Page 38	Parts VI.C.6.a and VI.C.8.a.ii-iii	Modify the following statement in the EWMP as follows, “The schedule identified in this EWMP <del>remains tentative and</del> is subject to change based on changing data, information, legislation, law, and fiscal priorities through the adaptive management process. <u>Any schedule modifications will be consistent with TMDL related</u>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<u>compliance schedules and will be submitted to the Regional Board for review and approval per the requirements of the LA County MS4 Permit."</u>
Page 46		The information in the draft EWMP regarding existing institutional BMPs is lacking in detail. The EWMP must be revised to include more details on the existing MCMs/Institutional BMPs, including the scope of implementation (i.e., which Permittees are implementing each measure in Section 3.1.1) and a description adequate to understand the linkage between the BMP and water quality (e.g., "scheduling," "water trucks," etc.).
<b>Water Quality Characterization</b>		
Table 2-2, Page 23		Include a commitment to update the water quality characterization as more water quality data become available through the CIMP for waterbodies such as Little Santa Anita Canyon Creek/Santa Anita Wash, Monrovia Canyon Wash, Sawpit Wash, and Little Dalton Wash.
<b>Water Body Pollutant Classification</b>		
Section 2.2	Part VI.C.5.a.ii	The EWMP does not identify Category 3 pollutants. However, Table D-1 indicates that there are some pollutants that have exceeded water quality objectives in the past 5 years, but for which a TMDL has not be established. Include these pollutants as Category 3 pollutants in the EWMP, or provide an explanation for excluding these pollutants. See also Enclosure 2.
Table 2-5	Part VI.C.5.a.ii (page 60)	<p>Revise Table 2-5 and other applicable sections of the draft EWMP, including corresponding tables in Attachment C, to address the following comments:</p> <ul style="list-style-type: none"> <li>• Add a note to the table to acknowledge that although the City of Azusa is in the Santa Fe Dam Park Lake subwatershed, the USEPA Los Angeles Area Lakes TMDL for Nitrogen, Phosphorous, Mercury, Trash, Organochlorine Pesticides, and PCBs (Los Angeles Area Lakes TMDL) states that there are no MS4 discharges to Santa Fe Dam Park Lake (p. 11-16 of Los Angeles Area Lakes TMDL).</li> <li>• Add a note to Monrovia Wash to acknowledge that Monrovia Canyon Creek is 303(d) listed for lead. However, the Los Angeles River and Tributaries Metals TMDL (Basin Plan Amendment Resolution No. R10-003 Attachment A) only assigns a dry-weather load allocation for nonpoint sources and therefore, no WLA is assigned for MS4 sources.</li> <li>• Category 1A, Nutrients: Add Nitrate+Nitrite and denote with "(F)" for Rio Hondo Reach 3, Monrovia Wash, and Sawpit Wash.</li> <li>• Category 1A, 1B: Omit rows for Copper (dry), Lead (dry), and Zinc (dry).</li> </ul>



EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		<ul style="list-style-type: none"> <li>• Category 1A, Copper (wet), Peck Road Park Lake: Add a note stating that as per the USEPA Los Angeles Area Lakes TMDL (page 4-1 and 4-22), lead is currently meeting numeric targets for water and sediment (wet and dry weather) and therefore, no WLA was assigned.</li> <li>• Category 1A (Nutrients, Metals, Trash) and Category 1B (Metals and Bacteria): Add a note stating that MS4 discharges from Sawpit Wash, Santa Anita Wash, and direct MS4 discharges to Peck Road Park Lake are subject to the Los Angeles River and Tributaries Metals TMDL (LA River Metals TMDL) and the Los Angeles River Watershed Bacteria TMDL (LA River Bacteria TMDL).</li> <li>• Category 2C: Include bacteria (E. coli) for Big Dalton Wash per the finding in the SGR Bacteria TMDL (June 2015) that Big Dalton Wash is impaired by indicator bacteria.</li> <li>• Add Category 3 pollutants as appropriate based on Appendix D receiving water analysis.</li> </ul>
<b>Source Assessment</b>		
Section 2.3	Part VI.C.5.a.iii	The EWMP must be revised to include all relevant findings regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters from all of the following programs: <ul style="list-style-type: none"> <li>• Permittee(s)' IC/IDE programs</li> <li>• Industrial/Commercial Facilities Pollutant Control programs</li> <li>• Development Construction programs, and</li> <li>• Public Agency Activities programs.</li> </ul>
Table 2-6, Page 29	Part VI.C.5.a.iii.(1)(a)(v)	Include all details from applicable 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, including from the recently adopted SGR Bacteria TMDL (June 2015).
Section 2.3	Part VI.C.5.a.iii.(1)(a)(vi)	Review all TMDL Staff Reports, TMDL Implementation Plan(s) and supporting documents, if developed (see TMDL Reporting Requirements in Attachment E, Part XIX, pages E-45 to E-62); and other watershed management plans to determine if there are any watershed model results. If watershed model results exist, include them in the revised EWMP.
Table 2-8, Page 29	Part VI.C.5.a.iii.(1)(a)(vii)	Include all details 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.
Table 2-8 & Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Add Big Dalton Wash for bacteria as a category 2 pollutant in Table 2-8 of the draft EWMP as per the Indicator Bacteria in the San Gabriel River, Estuary, and Tributaries TMDL (San Gabriel River

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		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. Additionally, add a discussion on bacteria in Section 2.3.3 referencing the SGR Bacteria TMDL (Table 7-41.2 footnote 5) and the staff report (p. 21, 31, and 35). Revise other applicable EWMP sections accordingly.
Table 2-8 & Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Table 2-8 of the draft EWMP lists Peck Road Park Lake for Bacteria as a Category 1 pollutant rated high for MS4 linkage. Add a footnote clarifying that Peck Road Park Lake does not have a TMDL or 303(d) listing for bacteria but was categorized as a Category 1 pollutant based on source assessment. Revise other applicable EWMP sections accordingly.
Table 2-8 & Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Table 2-5 of the draft EWMP lists San Dimas Wash and Big Dalton Wash for lead as a Category 1 pollutant as per the Los Angeles River and Tributaries Metals TMDL (LA River Metals TMDL). Explain in Section 2.3.3 why Table 2-8 does not include San Dimas Wash and Big Dalton Wash as a Category 1 pollutant for lead (i.e., no exceedances based on data). Add San Dimas Wash and Big Dalton Wash in Table 2-8 of the draft EWMP for category 1 pollutant lead, unless there justification is provided for not adding these waterbodies Revise other sections of the EWMP accordingly.
Table 2-8 & Section 2.3.3	Part VI.C.5.a.iii (pages 60-61)	Explain in Section 2.3.3 of the draft EWMP if there are any MS4 sources or significant exceedances based on data for cadmium, copper, and zinc in Peck Road Park Lake. If so, add to Table 2-8 of the draft EWMP for the aforementioned metals as a Category 3 pollutant or a Category 2 pollutant if it meets 303(d) listing criteria. Revise other applicable sections of the EWMP accordingly.
<b>Selection of Watershed Control Measures</b>		
Page 59	Part VI.C. 1.g.iv	<p>The EMWP should be revised to clarify the difference between the list of Regional BMP projects on page 59 and that in Table 3-23 on page 102 of the EWMP.</p> <p>“The following four projects exhibited the greatest potential of the planned regional BMP projects to possibly satisfy the regional EWMP project criteria. Some of these project sites were evaluated as part of the regional project screening further detailed in Section 3.2.4.”</p> <ul style="list-style-type: none"> <li>• Buena Vista Wetlands</li> <li>• Hugo Reid Park Infiltration Basin Project</li> <li>• Monrovia Station Square Project</li> <li>• Whittier Narrows Park Project</li> </ul> <p>(EWMP, page 59)</p> <p>Identify which of these four projects were evaluated as part of the regional project screening in Section 3.2.4, and provide the results of the screening. For projects that were not evaluated as part of</p>



EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		the regional project screening, provide an explanation for why they were not.
Section 3		Provide a detailed description on each of the selected Regional EWMP projects, describing the BMP in more detail. This should be done in either Section 3 or in a new Attachment. (Attachment E has a good academic discussion of various types of BMPs, however there is not a good description of each of the Regional EWMP projects that were on the final list of 10 EWMP Regional projects.)
Table 3-1; Section 3.1.3, Page 49	Part VI.C.5.b.ii.(1), page 62	Revise the EWMP to more clearly address non-stormwater. There is an assumption made by the EWMP that the control measures for addressing stormwater will also apply to non-stormwater.
Section 3	Part VI.C.5.b.iv.(3), page 64	Include (or provide an explanation for not including) control measures identified in the Implementation Plan(s) submitted by Permittees subject to the LA River Metals TMDL. Acknowledge the upcoming submittal of dry weather bacteria LRS for segment B tributaries of the Los Angeles River.
Tables 3-6 and 3-7, Pages 78-79	Part VI.C.5.b.iv.(4)(a), page 64]	The EWMP must be revised to specify which of the regional projects in Tables 3-6 and 3-7 will be implemented, justify why others will not be implemented, and clarify that in the body of the EWMP in section 3.2.4 and elsewhere, as appropriate.
Table 1-6	Part VI.C.5.c (page 66)	Revise Table 1-6 of the draft EWMP to omit the row for SGR Metals and LAR Metals in dry weather. Also revise other applicable sections of the EWMP accordingly.
Table 1-6		Add a footnote to Table 1-6 of the draft EWMP to reference Attachment D “Key findings related to the Los Angeles River Nitrogen TMDL” of the draft EWMP.
Table 2-9 & Table 2-12	Part VI.C.5.c (page 66) & Part VI.E.3 (pages 148-149)	<p>Table 2-9 of the draft EWMP indicates that Peck Road Park Lake nutrients (total nitrogen and total phosphorus) are categorized with the Harbor Toxics TMDL “scheduling class.” Note that Peck Road Park Lake drains to Rio Hondo Reach 3 which is subject to the Los Angeles River Nitrogen Compounds and Related Effects TMDL (LA River Nutrients TMDL). The LA River Nutrients TMDL requires compliance as of the effective date of the LA County MS4 Permit. Therefore, revise Table 2-9 to substitute “Harbor Toxics TMDL” with “LA River Nutrients TMDL” (or another Lakes TMDL for nutrients) as the scheduling class for Peck Road Park Lake total Nitrogen and total Phosphorus.</p> <p>Table 2-12 proposes March 23, 2032 as a milestone for the USEPA Peck Road Park Lake Nutrients TMDL. 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</p>

EWMP Reference	MS4 Permit Provision	Comment and Necessary Revision
		schedule exceeds one year, the proposed schedule shall include interim requirements with numeric milestones and dates for final compliance. If any changes are made to the proposed milestones for Peck Road Park Lake Nutrients, revise applicable sections of the EWMP accordingly, including Section 2.5.2.1 and Tables 2-11 and 2-12, among others. See Enclosure 2 for additional comments.
<b>Enhanced Watershed Management Program Provisions</b>		
Page 149		Specify how funds will be used most effectively (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). This could include alignment with CIPs, IRWMP projects, planned park improvements, etc.
Page xviii		The EWMP must be revised to include non-structural control measure costs. These costs do not seem to be included in Section 6 Control Measure Implementation Cost. The EWMP states that: "There is not a significant cost increase associated with non-structural control measure implementation; therefore, costs focus on the regional and distributed BMPs." To the extent that these costs will remain constant from the previous iteration of the permit, provide the expenditures by each Permittee specific to MS4 permit implementation (excluding EWMP and CIMP development).
Section 3.4.2	Part VI.C.5.b.iv.(4)(e), page 65	Provide a table listing the responsible Permittee for each Regional EWMP Project. (Figure 3-33 only identifies the location of each Regional EWMP Project).
Section 5		The EWMP must provide a clear connection between the implementation schedules in Section 5 and the applicable TMDL compliance schedules.
Section 6.5		Update Table 6-7 to include available funds from Prop 1 for stormwater grants and IRWM projects.
Section 6.5		Identify specific sources of funds that are available or will be pursued for near term (at least through 2017) BMP implementation.
Page 159	Part VI.C.8, pages 68-70	Section 7 of the EWMP states that, "an addendum or amendment will be required for the EWMP two years after the Regional Board Executive Officer approval and every two years thereafter..." Revisions can be included in an addendum or amendment, but the entire EWMP must be assessed and revised as necessary every two years as part of the Adaptive Management Process.
Figure 7-1, Page 160	Part VI.C.8, pages 68-70	The steps outlined in Figure 7-1 do not appear to follow a logical sequential order. Reconsider the steps and revise the figure for greater clarity.



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**Los Angeles Regional Water Quality Control Board**

**Enclosure 2 – Summary of Comments and Necessary Revisions for the Reasonable Assurance Analysis (RAA)**

**Rio Hondo/San Gabriel River Water Quality Group  
Enhanced Watershed Management Program (EWMP)**

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

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This memorandum contains the comments on Section 4, Reasonable Assurance Analysis (RAA) of the draft Enhanced Watershed Management Program (EWMP) for the Rio Hondo/San Gabriel River Water Quality Group dated June 2015.

General comments on the RAA section of the draft EWMP report:

1. Table 2-5 on pages 27-28 of the EWMP did not classify water body-pollutant combinations for all creeks and tributaries of the Los Angeles River and San Gabriel River within the EWMP area, including Little Santa Anita Canyon Creek, Santa Anita Wash, and Little Dalton Wash. The EWMP must either be revised to include water body-pollutant classification for these waterbodies and associated planned/proposed BMPs accordingly, or the Group must provide a commitment to update the water quality characterization as more water quality data become available through the CIMP for these waterbodies.
2. The Regional Board adopted the San Gabriel River, Estuary and Tributaries Indicator Bacteria, Resolution No. R15-005 on June 10, 2015. The EWMP should be revised to address bacteria in Big Dalton Wash, which was identified as impaired in the TMDL, including proposed watershed control measures, interim and final milestones and dates for their achievement and reasonable assurance analysis.
3. Section 2.1.1 provides a summary of key findings from receiving water data analysis. There are exceedances in Rio Hondo Reach 3 for Benzo(k)Fluoranthene, Bis(2-Ethylhexyl) Phthalate, Diazinon, Dibenzo(a,h)Anthracene, Dissolved Oxygen, pH, and Indeno(1,2,3-cd)Pyrene (Table 2-3 on pages 24-25; Appendix D). Revised the EWMP to include these water body-pollutant combinations as Category 3 pollutants, or provide an explanation for each regarding why they are not addressed by the EWMP.
4. EWMP proposes that Peck Road Park Lake Nitrogen, Phosphorus, Mercury, Organochlorine Pesticides and PCBs TMDLs milestone schedule follow that of the Harbor Toxics TMDL with the rationale that control measures to reduce toxics should also significantly reduce the concentration of nutrients (Section 2.5.2.1 on pages 35-36). The scale of measures to control and reduce nutrients, metals, and toxic pollutant discharged to a lake system are significantly different than those control measures anticipated for the Greater Los Angeles and Long Beach Harbors. Therefore, the

selection of an implementation schedule based on the implementation schedule for the Dominguez Channel and Greater Los Angeles and Long Beach Waters Toxic Pollutants TMDL is not supportable. Revise the schedules proposed for Peck Road Park Lake in consideration of the nutrient and toxic pollutants TMDLs for lake systems adopted by the Regional Board such as the Machado Lake TMDLs that have suitable control measures and implementation schedules.

RAA Modeling comments:

1. In addition to linear bias statistics presented in Tables 4-2, 4-4, 4-8, 4-10, 4-13, provide additional explanation and interpretation of the root mean square and coefficient of correlation statistics in these tables, and any differences in the conclusions that can be drawn regarding the hydrology and water quality calibrations based on the three statistics. In addition, the coefficients of correlation between modeled and observed values as shown in Table 4-8, Table 4-10, Table 4-13 of the EWMP report respectively for copper, lead, zinc, fecal coliform, total nitrogen, and total phosphorus are low values for coefficients of correlation. Provide an explanation for these low values. Further, data needed to improve model calibration for these constituents should be identified along with a commitment to collect the necessary data and refine the model calibration through the adaptive management process.
2. The model results of the baseline critical condition in terms of runoff volume, pollutant concentration, and pollutant loading are provided in Table 4-14, Table 4-15, Table 4-17 and Table 4-18. However, the duration curves or frequency curves of runoff volume, pollutant concentration and pollutant loading for the baseline condition at each analysis region for each pollutant of concern should be presented as well to demonstrate that the model results of baseline condition are based on the 90<sup>th</sup> percentile critical condition.
3. The estimated allowable loads and required load reductions the LAR and SGR watershed areas appear to be provided in Table 4-14 and 4-15 to demonstrate that the estimated allowable loads and load reductions are obtained from the 90<sup>th</sup> percentile critical condition of runoff volume and allowable pollutant concentration. It is recommended that the allowable loads and required load reductions are provided in the same duration curves for baseline condition to demonstrate that the estimated allowable loads and load reductions meet the 90<sup>th</sup> percentile critical condition.
4. In the report, summary statistics of load reduction and percent reduction for different control measures are provided as shown in Table 4-23 and Table 4-24, however some numbers to arrive at the modeled values of load reduction and percentage are not clearly identifiable. Provide the RAA results for the proposed control measures and potential BMPs to demonstrate the effectiveness of the proposed BMPs that would achieve the required pollutant load reductions and load reduction goals in terms of 1) influent volume, concentration and load; 2) treated volume, concentration and load; and 3) effluent volume, concentration and load through the system of BMPs at the downstream point of BMP systems to demonstrate the effectiveness of the proposed BMPs.



Finally, provide an example validation for a representative waterbody within the Rio Hondo / San Gabriel River Watershed Management Area, or in another EWMP area where the same RAA approach is used, that demonstrates that with all proposed BMPs in place, as determined from the initial analysis of the necessary volume and/or pollutant load reduction, will result in achieving the RWLs.