

**California Regional Water Quality Control Board, Los Angeles Region  
 Los Angeles County Municipal Storm Water Discharge Permit  
 Response to Comments on the Tentative Order  
 US EPA COMMENTS on TMDL and WMPs PROVISIONS**

<b>Section/ Topic</b>	<b>Comment</b>	<b>Commenter</b>	<b>Response</b>	<b>Change Made</b>
Watershed Management Programs (WMPs)	We found no mention of public review of WMPs in the fact sheet, and we recommend this be mentioned and stressed to ensure the public is fully aware of this opportunity and to encourage public review. For example, page F-40 of the fact sheet notes that a draft WMP must be submitted to the Board for approval within one year of adoption of the permit, but no mention is made of any opportunity for public review and comment.	US EPA	The Watershed Management Plans are subject to public review and the fact sheet will be revised to encourage public participation in reviewing the WMPs.	Change made to fact sheet

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Total Maximum Daily Load Requirements	<p>EPA further supports language concluding that if the Board determines a plan or schedule is inadequate, then compliance with the numeric WLAs and water quality objectives, as defined in the TMDL, must be met immediately. We believe such provisions will best assure water quality improvements. To reinforce the permit expectations as we understand them, we'd suggest the following specific changes:</p> <p>Page 114, section VI.E.3. next to last sentence should be revised to "In lieu of inclusion of numeric water quality based effluent limitations at this time, this Order requires the Permittees subject to WLAs in USEPA established TMDLs to propose and implement best management practices (BMPs) that will be effective in achieving compliance with USEPA established numeric WLAs."</p>	US EPA	The Board agrees that permit expectations should clearly delineate the compliance determination mechanism should Watershed Management Program or schedule be determined to be inadequate.	Changes made to Order.

<b>Section/ Topic</b>	<b>Comment</b>	<b>Commenter</b>	<b>Response</b>	<b>Change Made</b>
Total Maximum Daily Load Requirements	Page 115, section VI.E.3.c.iii. should be revised to: “A detailed time schedule of specific actions the Permittee will take in order to achieve compliance with the applicable WLAs.”	US EPA	The Board agrees and will revise the Order.	Changes made to Order
Watershed Management Program	Page 51, Section VI.C.3.b. iv.(1)(c) should be revised to: “If the Permittee(s) elects to eliminate a control measure identified in Part VI.D.4 to Part VI.D.9 because that specific control measure is not applicable to them, the Permittee(s) shall provide a justification for its elimination.”	US EPA	The Board agrees that the specific provisions provided by US EPA are appropriate and has revised the Order accordingly.	Changes made to Order
Watershed Management Program	Page 55, Section VI.C.6.b.ii. should be revised to clarify that the reference to modifying compliance deadlines or interim milestones does not apply to deadlines or milestones associated with TMDLs, but rather applies to new deadlines and milestones that are not including in this permit, but are developed pursuant to the Permittee(s)’ Watershed Management Program.	USEPA	The Board agrees and has clarified this provision.	Changes made to Order