
You ask:

_**EPA has examined these additional BMPs and permit conditions and seeks feedback on whether some of these additional measures or others should be added to the draft 2016 PGP WQBELs to further protect water quality. EPA has included examples of some permit requirements from NPDES authorized state WQBELs in the docket. See document titled, “Examples of State PGP Provisions that Address WQBELs/WQ Monitoring.”**_

WQBELs need a real baseline based on real data over a substantial time period.

BMPs are no more than a guess. We find that the Los Angeles Regional Water Quality Control Board has implemented measures in their permitting that ignores real statistics in determining baselines and relies on faulty models based on little real data.

Those faulty models produce measurements that are not based in reality. In other words, ambient compliance has been replaced by a "guess".

Without any Economic Impact Analysis, billions of dollars is expected to satisfy these modeled permits. There is no tax basis to fund any fees for compliance. Smaller urban cities see bankruptcy as a future with such out-of-control compliance expectations.

Please base compliance in financial reality.

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