

The Bureau requests the following:

1. REVIEW OF UNEXAMINED WATER QUALITY LIMITED SEGMENTS: The Bureau requests that the RWQCB re-evaluate the "legacy" listings shown in Table 1 (attached) utilizing the procedures in the 2004 State Listing Policy. This request reiterates Comment No. 5 on the Bureau's October 18, 2006 letter, which was submitted during the comment period for the 2006 303(d) list proposed by the State Water Resources Control Board (SWRCB) and is enclosed for reference. While we are re-submitting that comment, the following additional thoughts are added regarding these listings. The "legacy" listings were placed on the 303(d) List prior to 2002 and appear on the previous 1998 303(d) List available on the RWQCB's website. While we recognize that the SWRCB declined to re-evaluate many of these listings as indicated in its Responses to Comments staff report for the 2006 303(d) listing, we do not agree with the rationale and logic for not re-evaluating the listings utilizing the Listing Policy. We note the objective of the Listing Policy is to "establish a standardized approach for developing California's section 303(d) list" and the "methodology to be used to develop the section 303(d) list [40 CFR 130.7(b)(6)(i)] is established by this Policy."

Our principle concern with the RWQCB staff's decision not to retroactively apply the Listing Policy to the legacy listings is the potential substantial resources that the State will incur for developing TMDLs and the resources the Bureau and other stakeholders will expend to comply with a TMDL approved based on each and every one of the listings. The most effective way to ensure such resources are not wasted due to a flawed listing rationale is to ensure that the same procedures, criteria, and transparency are applied uniformly to all pollutant/waterbodies combinations. This can be achieved by providing the data used to justify these listings and evaluating the data based on the applicable listing factors in the Listing Policy. We note that this concern would be partly addressed if the Bureau could examine the data and information that formed the basis of the original listings for these waterbody/pollutant combinations in the first place. After due diligence, however, we cannot locate this data or any information to substantiate the basis for the listings. We note that the 1996 List available on the RWQCB's website link does not provide any data or data reference for the list as no fact sheets were prepared for the listings to our knowledge (with the exception of two listings), and no information is contained in the "comment" column for the 1998 List.

The Bureau requests that all listed waterbody/pollutant combinations be examined under the listing criteria of 2004 State Listing Policy. The waterbody/pollutant segments identified by the Bureau as requiring examination are listed in Table 1. The Bureau requests that at a minimum, the waterbody/pollutant segments identified in Table 1 be reviewed under the listing requirements in the 2004 Listing Policy.

2. PREPARE AND UPDATE FACT SHEETS FOR ALL IMPAIRED WATERS LISTINGS:
The Bureau requests that fact sheets be prepared for all Impaired Waters on the 303(d) List and included in the staff report. The Bureau appreciates the development of fact sheets for listings that change the 303(d) list and agrees with the purpose of fact sheets in relation to the role they serve in providing tangible evidentiary support for each listing decision. Fact sheets meeting the Listing Policy's implementation requirements for all water bodies, in particular the legacy listings in Table 1, would facilitate review and validation of the listings. If the fact sheets are not present for a listing the State cannot: 1) validate the previous impairment decision, 2) adjust for changes in the development of new water quality criteria, 3) adjust to changes in environmental and receiving water conditions, and 4) adjust to the application of the use attainability analysis or site specific objective. The data presented in fact sheets are typically utilized as part of the TMDL development and implementation process and a component of scientific studies conducted to determine impairment.

The Bureau requests that these fact sheets be prepared and included in the 2008 report. Fact sheets should be developed for all listings not just for changes on the list. These fact sheets should be updated biennially, so that stakeholders can be better informed on the reasons for a listing decision and review water quality trends.

3. CONDITION LISTINGS WITH NO ASSOCIATED WATER QUALITY CRITERIA:
During the 2006 listing cycle, the SWRCB deleted a number of waterbody listings for "conditions" from the 303(d) list. Waters listed for conditions such as algae, odor, debris, enteric virus, scum/foam, or beach closures are inappropriate because these are waterbody conditions and not pollutants as required by 40 CFR §130.7(b)(4) or the 2004 Listing Policy. The Bureau also requests that the RWQCB move away from listings based on a Category of Pollutants. Pollutants should be identified as stated in 40CFR §130.7(b)(4): "The list required under §§ 130.7(b)(1) and 130.7(b)(2) of this section...shall identify the pollutants causing or expected to cause violations of the applicable water quality standards..." For the 2008 List, the Bureau requests that listings shown in Table 2 for conditions without water quality criteria be evaluated for removal from the 2008 303(d) list.

Additionally, although the Bureau agrees with the desire of RWQCB staff to identify "a clear approach for determinations of impairment under the biostimulatory substances standard in the Basin Plan" as described in Section 3.3.3 (pp. 10-12) of the Staff Report, the Bureau is concerned with the proposed use of numeric guidelines for listing for biostimulatory substances that are not based on established water quality criteria. Should the RWQCB staff decide to pursue the development of numeric values for biostimulatory substances for listing decisions, the RWQCB should develop numeric criteria through a Water Quality Standards setting process in which all required factors under the State Water Code are considered and the required public process is followed. It is not appropriate to set de facto biostimulatory substances objectives that will be used for the development of listing decisions and TMDLs through the 303(d) development process. Objectives for biostimulatory substances are generally site-specific and dependent on local conditions as demonstrated from the range of values presented in the tables (Tables 3.2, 3.3). To effectively determine impairments, site-

specific criteria need to be developed through a standard setting process and utilized for listing decisions. It should also be noted that to date, no Region 4 TMDL to address biostimulatory substances has used targets as low as the numbers proposed in Table 3-2 of the Staff Report for listing considerations. As a result, the potential criteria would result in listings for waterbodies that are meeting TMDL targets.

The Bureau requests that waterbodies listed for a condition (Table 2) be evaluated and if appropriate removed from the list until further data indicates impairment due to pollution or toxicity. The Bureau also requests that listings for enteric virus be evaluated under the Listing Policy, as there are no criteria to evaluate impairment. Additionally, the Bureau requests that the development of numeric values for biostimulatory pollutants be established through the Water Quality Standards setting process

4. TYPOGRAPHICAL ERRORS AND CONTRADICTION LANGUAGE:

Due to confusing language, the Bureau requests that the current wording in Section 3.3.1 (pg. 7) of the Integrated Report regarding the exceedance days for indicator bacteria, be revised as shown below.

~~"To calculate the The number of exceedance days, the number of days during a defined period equals the sum of individual days during which one or more indicator bacteria exceeds the standard is an exceedance day."~~

5. DETAILED COMMENTS ON SPECIFIC LISTINGS: In addition to the previous comments on listings provided in Tables 1 and 2 the Bureau has identified incomplete, incongruent or inaccurate listings and delistings based on the report and data provided by the RWQCB and the 2004 State Listing Policy. More detailed comments on these listings are provided in the Table 3. Specific issues are highlighted below:

- a. *The Bureau requests that the listings for dieldrin and DDT for Marina Del Rey Harbor Back Basins be delisted. During development of the Toxic Pollutants TMDL for this water body, the RWQCB reviewed the available data and determined that dieldrin and DDT no longer cause impairment of the marina's back basins. (See Table 7-18.1 to Attachment A to LARWQCB Resolution No. 2005-012 amending Section 7 of the Basin Plan).*
- b. *The Bureau requests that the listing for trash for Compton Creek be re-categorized from requiring a TMDL to "being addressed by USEPA approved TMDL (B)." A Trash TMDL for the Los Angeles River and its tributaries has been incorporated in the Los Angeles Region Basin Plan by LARWQCB Resolution No. 2007-012. Compton Creek is identified as a tributary of the Los Angeles River in the TMDL Staff Report. Thus, the trash impairment in Compton Creek is already being addressed by a TMDL.*

- c. *The Bureau requests that the decision to "Do Not Delist" sediment toxicity for the San Pedro Bay be placed on hold until the data used to justify the listing is made readily available in a more transparent fashion for review by stakeholders. The language used in the reference section of the fact sheet for this listing provides insufficient information to locate the data used to justify that listing. Specifically, "Eleven of 33 samples were toxic (BPTCP). Two of 14 samples were toxic (Bight, 1998). None of three samples were toxic (W-EMAP) (LARWQCB & CCC, 2004).". These references do not provide a data year for the BPTCP data and nor describe which specific stations were monitored by each study. The weblinks provided by RWQCB staff (Jeffrey Shu) were not useful in discovering the specific data described in the fact sheet. This may have occurred because the location description was vague ("Los Angeles and Long Beach harbors," never specifying San Pedro Bay) or because the data retrieved by the web link did not contain sediment toxicity data.*
 - d. *The Bureau requests listings based on sediment toxicity including those for specific pollutants in sediment should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that this plan "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments" (SWRCB Resolution 2008-0070). The SWRCB recognizes the need to ensure that the listing policy and the SQO Plan are consistent. Therefore, SWRCB staff has been directed to revise the Listing Policy to achieve consistency with the sediment quality objectives in said plan. The Bureau has listed in Table 3 those waterbodies that should be evaluated based on the SQOs.*
 - e. *The Bureau requests that the PAH listing for Ballona Creek Estuary, be removed based on the Fact Sheets Decision ID 7584 which state "Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against placing this water segment/pollutant combination on the section 303(d) list in the Water Quality Limited Segments category."*
 - f. *The Bureau requests that RWQCB staff should ensure the available data and fact sheets are consistent. Although the data available for review for the proposed new listings generally support the listings, the fact sheets are not always consistent with the data available for review.*
6. USE A PRIMARY LINE OF EVIDENCE IN CONJUNCTION WITH THE TMDL: A primary line of evidence used in conjunction with a TMDL will satisfy Section 2.2 or Section 3.11 of the Listing Policy. Referencing a TMDL does not provide information to evaluate the original listing or subsequent listing decision. Without including the supporting data in the Staff Report, stakeholders can not verify if the conditions for placement in the water quality

limited segments category have been met or if water quality standards have been attained. This includes listings placed in the 'Being Addressed' category.

The Bureau requests that the data used to make the initial impairment determination be included in the Staff report and used in conjunction with a TMDL.

Table 1. "Legacy Listings" Pre-Dating 2002 CWA 303(d) List in Region 4 that Have Not Been Reviewed Utilizing the SWRCB 2004 Listing Policy

Water Body Name	Pollutant
Echo Park Lake	Algae
Echo Park Lake	Eutrophic
Echo Park Lake	Odor
Echo Park Lake	PCBs (tissue)
Echo Park Lake	Trash
Echo Park Lake	pH
Ballona Creek Estuary	Shellfish Harvesting Advisory
Ballona Creek Wetlands	Exotic Vegetation
Ballona Creek Wetlands	Habitat Alterations
Ballona Creek Wetlands	Hydromodification
Ballona Creek Wetlands	Reduced Tidal Flushing
Dominguez Channel Estuary	Benthic Community Effects
Lincoln Park Lake	Eutrophic
Lincoln Park Lake	Odor
Lincoln Park Lake	Organic Enrichment/ Low Dissolved Oxygen
Lincoln Park Lake	Trash
Lincoln Park Lake	Lead
Los Angeles Harbor-Consolidated Slip	Benthic Community Effects
Los Angeles Harbor-Consolidated Slip	Sediment Toxicity
Los Angeles/ Long Beach Inner Harbor	Beach Closures
Machado Lake (Harbor Park Lake)	ChemA (tissue)
Santa Monica Bay Offshore/Nearshore	Debris
Echo Park Lake	Ammonia
Echo Park Lake	Copper

Table 1. "Legacy Listings" Pre-Dating 2002 CWA 303(d) List in Region 4 that Have Not Been Reviewed Utilizing the SWRCB 2004 Listing Policy

Water Body Name	Pollutant
Echo Park Lake	Lead
Arroyo Seco Reach 1	Coliform Bacteria
Compton Creek	Coliform Bacteria
Dominguez Channel	Ammonia
Dominguez Channel Estuary	Ammonia
Dominguez Channel Estuary	Coliform Bacteria
Lincoln Park Lake	Ammonia
Los Angeles River Reach 1	Coliform Bacteria
Los Angeles River Reach 2	Coliform Bacteria
Los Angeles River Reach 4	Coliform Bacteria
Los Angeles River Reach 6 (above Sepulveda flood control basin)	Coliform Bacteria
Los Angeles River Reach 6 (above Sepulveda flood control basin)	Tetrachloroethylene/PCE
Los Angeles River Reach 6 (above Sepulveda flood control basin)	Trichloroethylene/TCE
Santa Monica Canyon	Lead
Torrance Carson Channel	Coliform Bacteria
Torrance Carson Channel	Copper
Torrance Carson Channel	Lead
Tujunga Wash	Coliform Bacteria
Wilmington Drain	Coliform Bacteria
Wilmington Drain	Copper
Wilmington Drain	Lead

Table 2. Water Bodies Listed for “Conditions” for Which no Water Quality Objective or Standard Exists

New Water Body Name	Pollutant/ Stressor
Echo Park Lake	Algae
Echo Park Lake	Odors
Lincoln Park Lake	Odors
Ballona Creek	Enteric Virus
Los Angeles/ Long Beach Inner Harbor	Beach Closures
Santa Monica Bay Offshore/Nearshore	Debris
Echo Park Lake	Eutrophic
Lincoln Park Lake	Eutrophic
Lincoln Park Lake	Organic Enrichment/ Low Dissolved Oxygen

Table 3. Detailed Comments on Specific Listings

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Marina del Rey Harbor - Back Basins	DDT (tissue)		This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that DDT is no longer a cause of impairment.
Marina del Rey Harbor - Back Basins	Dieldrin (tissue)		This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that Dieldrin is no longer a cause of impairment.
Compton Creek	Trash		This listing should be categorized as "being addressed by USEPA approved TMDL (B)." Compton Creek was identified as a tributary in the Los Angeles River Trash TMDL.
Cabrillo Beach (Outer)	DDT	NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL/	The RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. The original fish consumption advisory, which was based on fish tissue and formed the basis for the listing, appears to have conducted in the mid-1990's. There are no Fact Sheets available indicating the reason the listing appears as based on water column instead of fish tissue pollutant levels. The basis for the advisory should be investigated and upheld prior to maintaining the pollutant-waterbody on the list.
Cabrillo Beach (Outer)	PCBs	NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	The RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. The original fish consumption advisory, which was based on fish tissue and formed the basis for the listing, appears to have conducted in the mid-1990's. There are no Fact Sheets available indicating the reason the listing appears as based on water column instead of fish tissue pollutant levels. The basis for the advisory should be investigated and upheld prior to maintaining the pollutant-waterbody on the list.

Table 3. Detailed Comments on Specific Listings

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	Dichloroethylene / 1,1-DCE	GRW, REC1, REC2, WARM, WILD, WET/ MUN, IND	There is no line of evidence to support the original listing. Using the 2004 State Listing Policy listing criteria, the existing data provided by the State do not support a listing for this constituent. There are 0 exceedances out of 16 samples. There are 16 non-detects that are above the CTR objective for human health and organisms of 0.057 ppb. We believe any monitoring required due to groundwater contamination should be addressed under an alternative enforcement program. Additional data needs to be collected in order to support a listing or delisting of this constituent in this waterbody. The Los Angeles River and most of its tributaries have a conditional beneficial use designation for MUN. Conditional designations are not subject to federal law and therefore are not subject to TMDLs.
Los Angeles Harbor - Cabrillo Marina	DDT (tissue)	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	The OEHHHA fish consumption advisory should be re-evaluated as most of the original advisories were conducted in the mid-1990's. In addition, the RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. According to Section 3.4 of the Listing Policy a OEHHHA health advisory must be posted, a beneficial use for consumption identified, and the supporting data must be available indicating the evaluation guideline for tissue has been exceeded.
Los Angeles Harbor Consolidated Slip	DDT (tissue & sediment)	REC1, REC2, COMM, MAR, RARE, EST, MIGR, SPWN, WILD, NAV	This pollutant-water body listing for sediment should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that this plan "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments." (SWRCB Resolution 2008-0070). The SWRCB recognizes the need to ensure that the listing policy and the SQO Plan are consistent. Therefore, SWRCB staff has been directed to revise the Listing Policy to achieve consistency with the sediment quality objectives in said plan. (Ibid.). For the tissue based listing, there is no fact sheet available or tissue data available for review. Therefore the listing could not be validated using the Listing Policy.

Table 3. Detailed Comments on Specific Listings

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Los Angeles Fish Harbor	DDT	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no 2006 and 2008 Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory that formed the basis for the listing appears to have conducted in the mid-1990's. The basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.
Los Angeles River Reach 2 (Carson to Figueroa Street)	Oil	GWR, REC1, REC2, WARM/ MUN, IND, WILD	This Listing does not meet the requirements of Section 2 or 3.7 of the Listing Policy. There are no data in the record to evaluate as no fact sheets were found substantiating the listing decision. The Basin Plan describes the objective as "Waters shall not contain oils...in concentrations that result in a visible film or coating on the surface of the water or on objects in the water that cause nuisance or that otherwise adversely affect beneficial uses. No observational data is available that substantiates any of the conditions necessary to violate this standard.
Point Fermin Park Beach	PCBs		The current listing is based on water column exceedances. This original listing appeared to have been based on Section 3.4 of the Listing Policy, which allows for a listing where a OEHHA health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. OEHHA's fish advisories are based on fish tissue concentrations. Thus, listing should reflect this. This and similarly-based listings were conducted in the mid-1990's and were apparently founded on fish tissue pollutant concentrations. Therefore, (1) the RWQCB has not substantiated the water based pollutant listing and (2) the basis for the current fish advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.

Table 3. Detailed Comments on Specific Listings

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Point Fermin Park Beach	DDT		This waterbody/pollutant combination should be listed according to Section 3.4 of the Listing Policy which states that a health advisory must be posted, a beneficial use for consumption identified, and the supporting data must be available indicating the evaluation guideline for tissue has been exceeded. A fact sheet is not available for this listing; therefore, it is assumed that this listing was based on OEHHA's fish consumption advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.
Royal Palms Beach	DDT	NAV, REC1, REC2, COMM, MAR, WILD, SHELL/ SPWN	This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no 2006 and 2008 Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory that formed the basis for the listing appears to have been conducted in the mid-1990's. Therefore, the basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.
Royal Palms Beach	PCBs	NAV, REC1, REC2, COMM, MAR, WILD, SHELL/ SPWN	This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory, which should be based on fish tissue and form the basis for the listing, appears to have been conducted in the mid-1990's. The basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.
Santa Monica Bay Offshore/ Nearshore	Fish Consumption Advisory	REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	Please correct the "pollutant" basis for the listing. The existence of a fish consumption advisory is a listing factor, but is neither a "pollutant" nor a water quality objective delineated in any applicable plan or regulation. The fact that supporting data based on organism tissue must be available to support the listing under Section 3.4 of the Listing Policy which indicates specific pollutant concentrations in the organisms must be the reason OEHHA has issued the advisory. Currently there are OEHHA fish advisories for PCBs and DDT.

Table 3. Detailed Comments on Specific Listings

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Santa Monica Bay Offshore/ Nearshore	Sediment Toxicity	REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	During the SWRCB's 2006 listing process, the State provided no toxicity data in their line of evidence to support the listing decision. The RWQCB has provided no fact sheet for this listing. Therefore, stakeholders cannot validate the listing. Nonetheless, this pollutant-water body listing should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that Part 1 "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments." (SWRCB Resolution 2008-0070).
Los Angeles / Long Beach Inner Harbor	DDT	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	This listing has been updated from DDT (sediment & tissues) to DDT, i.e., a water column listing on the 2006 303 (d) list. However, a fact sheet is not available for this pollutant/waterbody combination. A fact sheet would allow the Bureau to review the data and appropriately comment on this pollutant/waterbody listing. The only information available for this listing is the SWRCB's 2006 comments stating that this listing was based on OEHHA fish advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.
Los Angeles / Long Beach Inner Harbor	PCBs	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	This listing has been updated from PCB(sediment & tissues) to PCB, i.e., a water column listing in the 2006 303 (d) list. However, a fact sheet is not available for this pollutant/waterbody combination. A fact sheet would allow the Bureau to review the data and appropriately comment on this pollutant/waterbody listing. The only information available for this listing is the State Board's 2006 comments stating that this listing was based on OEHHA fish advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.