

**Amendment Change Sheet: Santa Monica Bay Beaches Dry Weather Bacteria TMDL
September 23, 2002**

Document	Page No.	Description of Change and Justification
Amendment	Various	Changed the order of Tables 7-4.5a and 7-4.5b, since Table 7-4.5b (“Interim Compliance Targets by Beach Region”) is derived from Table 7-4.5a.
Amendment	Various	The changes simply substitute the preferred administrative law mandatory word “shall” for the equally directive word “will.”
Amendment, Table 7-4.4, “Loading Capacity”	3	Added a sentence to clarify that because the numeric targets must be met in the wave wash and throughout the day, no bacterial degradation allowance is provided.
Amendment, Table 7-4.4, “Waste Load Allocations”	4	Deleted the last two sentences in paragraph 3. The intent of this language was to clarify that it is not the intent of the Regional Board to require treatment or diversion of natural creeks or treatment of natural sources of bacteria from undeveloped areas, and that the Regional Board’s implementation procedure for the recently adopted bacteria objectives is the “reference system/antidegradation approach” outlined in this TMDL. This approach formalized in this TMDL and the Dry-Weather TMDL may be incorporated into the Basin Plan for future TMDLs. However, this language confused many commentors and, therefore, has been deleted, since this is adequately explained under “Numeric Target.”
Amendment, Table 7-4.4, “Compliance Monitoring”	7	Added a section in Table 7-4.4, titled “Compliance Monitoring.” The stipulations in this section were clearly outlined in the Staff Report, but were not included in the Amendment language. Discussion at the State Board workshop on the Dry-Weather TMDL concluded that these stipulations should be included in the Amendment for clarity.
Amendment, Tables 7-4.5a and 7-4.5b	9	<p>Due to an error in the rainfall analysis, the 90th percentile reference year and the number of wet days used to calculate the allowable number of exceedance days has changed. The correct reference year is 1993 (November 1, 1992 to October 31, 1993), with a corresponding 75 wet days. In this reference year, there was incomplete data for the rain gage used for sites in the northern part of the Bay. Staff proposes therefore to only use one rain gage (LAX) for all sites. This is reasonable in light of the fact that (1) in the previous reference year (1979) there was only a one day difference between the number of wet days at the south Bay gage and the north Bay gage, and (2) there is only a one day difference between the number of wet days between 1979 (the previous reference year) and 1993 (the proposed reference year).</p> <p>As a result of this correction, the estimated number of wet weather days in the reference (critical) year, the interim compliance targets, and the final allowable number of wet weather exceedance days have changed. These changes are reflected in Tables 7-4.5a and 7-4.5b.</p>

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Amendment, Table 7-4.6	14	Added language to provide additional detail on the scope of the reference system re-evaluation in the fifth-year revision. This language was added in response to public comments, and clarifies that the scope of the re-evaluation will include a reconsideration of whether the allowable number of exceedance days should be adjusted annually dependent on rainfall conditions and an evaluation of natural variability in exceedance levels in the reference system(s).