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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE
REFER TO FILE: WM-7

Mr. Jonathan Bishop
California Regional Water Quality
Control Board - Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013-2343

Dear Mr. Bishop:

SANTA MONICA BAY BEACHES WET-WEATHER BACTERIA TOTAL MAXIMUM DAILY LOAD IMPLEMENTATION PLAN JURISDICTIONAL GROUPS 1 AND 4

On behalf of the agencies responsible for the Santa Monica Bay Beaches Wet-Weather Bacteria Total Maximum Daily Load in Jurisdictional Groups 1 and 4, we are submitting the enclosed final implementation plan. Enclosed you will also find responses to written comments received from your office concerning the draft implementation plan submitted on March 15, 2005.

Thank you for your comments and input during the development of the plan. If you have any questions regarding the enclosed submittals, please contact Ms. Angela George at (626) 458-4341 or ageorge@ladpw.org.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

MARK PESTRELLA
Assistant Deputy Director
Watershed Management Division

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Enc.

ATTACHMENT 1

REGIONAL BOARD GENERAL COMMENTS (GC)

GC1. Describe more clearly and in greater detail how the draft Implementation Plan provides an integrated water resources approach to compliance with the Wet Weather TMDL.

The draft Implementation Plan should provide more explicit detail on how it represents an integrated approach to TMDL compliance. The draft Implementation Plan should both describe how "all the pieces work together" to support an integrated water resources approach as well as clearly enumerate for each of the non-structural and structural solutions meets the IWRA criteria identified in the Wet Weather TMDL. The matrix distributed at the June 6th meeting that lists BMPs and activities and identifies for each the water quality benefits, additional integrated water resources benefits and performance evaluation measure and method should be included in the final Plan.

Response to GC1:

A matrix that lists BMPs and activities and identifies for each the water quality benefits, additional integrated water resources benefits and performance evaluation measure and method is included in the Final Plan in the Executive Summary (Table ES.3) and as a new Section 5.20..

GC2. Include specific performance measures (i.e. implementation goals) as well as more detailed schedules for committed and pilot non-structural and structural solutions.

The Phase I and Phase II commitments and pilot projects contained in the Plan will ultimately be included into the Municipal Separate Storm Sewer System (MS4) NPDES Permit for Los Angeles County for these subwatersheds. As currently described in the draft Plan, many of these management measures maybe interpreted as recommended courses of action for the agencies to consider. Specific commitments including pilot projects need to be clarified. These commitments need to have specific performance measures and more detailed time schedules associated with them that if met will provide a reasonable expectation that the interim milestones and waste load allocations in the TMDL will be achieved.

The Water Board understands the need for flexibility to allow for contingencies associated with project planning and implementation. Therefore, the schedules may be identified as tentative, with the understanding that the schedules may be changed with good cause upon notification to the Water Board. However, the agencies should be prepared to maintain the pace of implementation proposed in the Implementation Plan.

For the Phase I committed and pilot non-structural solutions identified for each subwatershed specific implementation plan, performance measures for each program and more detailed program-level timelines should be included. For example, for the outreach to pet owners, how many pet owners will be targeted each year? The program commitment to establish guidelines for optimizing frequency of cleaning cycles for

drainage facilities should be expanded to not only establish guidelines, but have agencies implement the guidelines in their jurisdictions.

For structural BMPs that will be initiated in Phase I or II, more detailed planning/implementation schedules should be provided that identify timelines for selecting location(s) (from Table 5.1 or other possible locations), identifying the appropriate BMP(s), and completing planning and design steps.

Response to GC2:

Pilot Projects

The J1/4 Agencies are committed to implementing the Pilot Projects described in the Implementation Plan. It is recognized that because retrofits of this type are unique in this region, there may be site-specific constraints with respect to right-of-way, engineering, permitting, and other constraints. Therefore, pre-feasibility analyses for the Pilot Projects, which were scheduled to be conducted in Phase II, will now be initiated in Phase I.

It is conceivable that based on these pre-feasibility studies, Pilot Projects concepts may be refined or replaced. The Pilot Projects presented in the Plan represent, based on our understanding of current information, the best opportunities for cost-effective regional solutions. Therefore, it is recognized that replacement projects may not represent a functional, one-to-one, equivalent to the initially proposed Pilot Projects.

Local Solutions

Local solutions within the jurisdiction of the J1/4 agencies were listed in the Plan, but specific levels of commitment were not presented. Table 5.1 is now updated to reflect the level of commitment of local solutions as follows:

Site	Site Type	Subwatershed	Address	Jurisdiction	Approx. Area (acre)	Commitment
Malibu Lagoon County Beach (Surfrider)	Public Parking Lot	Carbon	23000 PCH, Malibu	LACDBH	0.68	Pilot
Las Flores Creek Park	Public Recreation Area	Las Flores	3755 Las Flores Canyon Road, Malibu	City of Malibu	4	Commit
Las Flores Maintenance Station (Caltrans)	Maintenance Station	Las Flores	3503 Las Flores Canyon Rd, Malibu	Caltrans		Pilot
Charmlee Nature Center	Public Recreation Area	Los Aliso	2577 South Encinal Canyon Road, Malibu	City of Malibu	547	Consider
Nicholas Canyon County Beach	Public Parking Lot	Nicholas	33850 PCH, Malibu	LACDBH	1.18	Consider
Topanga County Beach (East Lot)	Public Parking Lot	Topanga	18700 PCH, Malibu	LACDBH	0.97	Pilot
Topanga County Beach (West Lot, unpaved)	Public Parking Lot	Topanga	18700 PCH, Malibu	LACDBH	0.96	Pilot

ATTACHMENT 1

Site	Site Type	Subwatershed	Address	Jurisdiction	Approx. Area (acre)	Commitment
Zuma County Beach (Lot #1)	Public Parking Lot	Zuma	30050 PCH, Malibu	LACDBH	2.21	Consider
Zuma County Beach (Lot #2)	Public Parking Lot	Zuma	30050 PCH, Malibu	LACDBH	1.72	Consider
Zuma County Beach (Lot #3)	Public Parking Lot	Zuma	30050 PCH, Malibu	LACDBH	0.61	Consider
Zuma County Beach (Lot #4)	Public Parking Lot	Zuma	30050 PCH, Malibu	LACDBH	0.67	Consider
Zuma County Beach (Lot #5)	Public Parking Lot	Zuma	30050 PCH, Malibu	LACDBH	1.15	Consider
Zuma County Beach (Lot #6)	Public Parking Lot	Zuma	30050 PCH, Malibu	LACDBH	0.91	Consider
Zuma County Beach (Lot #7)	Public Parking Lot	Trancas	30050 PCH, Malibu	LACDBH	1.37	Consider
Zuma County Beach (Lot #8)	Public Parking Lot	Trancas	30050 PCH, Malibu	LACDBH	2.19	Consider
Zuma County Beach (Lot #9)	Public Parking Lot	Trancas	30050 PCH, Malibu	LACDBH	0.64	Consider
Zuma County Beach (Lot #10)	Public Parking Lot	Trancas	30050 PCH, Malibu	LACDBH	0.29	Consider
Zuma County Beach (Lot #11)	Public Parking Lot	Trancas	30050 PCH, Malibu	LACDBH	0.56	Consider
Zuma County Beach (Lot #12)	Public Parking Lot	Trancas	30050 PCH, Malibu	LACDBH	2.04	Consider
Trancas Canyon Park	Public Recreation Area	Trancas	between 6120 & 5942 Trancas Canyon Rd,	City of Malibu	15	Committ
Zuma Beach Maintenance Yard	Maintenance Facility	Zuma	30100 PCH, Malibu	LACDBH	0.53	Consider
Point Dume County Beach	Public Parking Lot	Zuma	7103 Westward Beach Rd., Malibu	LACDBH	2.45	Consider

Local solutions that would be fall under the jurisdiction of non-J1/4 agencies, or that would be conducted in conjunction with private ownership, would be incentive-based and voluntary.

Schedules

Tentative project schedules are presented in Appendix B to detail the general order and timing of committed activities within this Implementation Plan. The start and end dates of most projects have been approximated for budgetary and overall management purposes. These dates are not intended to be used as firm compliance dates as several factors could cause projects to be expedited, delayed, or extended. It is the intention of the responsible agencies to programmatically follow this schedule; however, many factors, such as environmental permitting, land acquisitions, and ordinance change, are outside their direct control. Any significant changes to project schedules will be outlined within the annual progress reports.

The RWQCB comment letter references outreach to pet owners as an example gage by which to measure implementation progress, and ties this in to the programmatic schedule. This is discussed below in more detail as measures to assess effectiveness.

Assessment of Effectiveness.

The Regional Board requests additional detail on specifics for assessing effectiveness. Two basic approaches are presented in the Final Plan: 1) a presumptive approach and 2) a targeted study/monitoring-based approach.

Presumptive Approach

The presumptive approach assumes that the implementation of structural and non-structural BMPs will lead directly to reductions of exceedance days and attempts to quantify this relationship. It is recognized that there is significant uncertainty and it is expected that the iterative and adaptive management strategies are employed, both effectiveness will improve and the correlation of activities to water quality compliance will improve.

A presumptive approach is needed because of the high sensitivity of compliance to hydrology (exceedance days), and that as a result an ineffective could still yield short-term compliant results, while a plan that is beginning to show effectiveness could still show non-compliance. In addition, there is high sensitivity to other hydrologic factors such as the Malibu Creek drainage. There are potential contributions from other sources outside the sphere of influence of this plan (Onsite Wastewater Systems), and monitoring in the wave wash further could add additional variability which would make direct tracking of effectiveness difficult.

The California Association of Stormwater Quality Agencies (CASQA) has initiated efforts to quantify effectiveness, and the County of Los Angeles conducted (and will be updating) segmentation studies to establish behavioral changes tracked by public information efforts. None of these approaches, however, have presented definitive measures for quantifying water quality improvement due to the inherent difficulty of this type of analysis.

Therefore, the first proposed measure of effectiveness is a presumptive approach tied to effort with presumed performance, which would be updated and revisited at the reopener phase in 2007.

Parameters assumed for this presumptive gage include:

- Population:
 - Permanent Residential Population: 18,000 (based on 2000 census values for Malibu and Topanga)
 - Assumed Non-Residential Population (workforce, visitors, students): 10,000
 - Total Target Population for all measures: 28,000
 - Approximate Population distribution (assumed based on total residential developed land use fraction)
 - High Priority Subwatersheds: 30%
 - Medium Priority Subwatersheds 40%

- Low Priority Subwatersheds: 30%
 - Distribution/readership of local information outlets (Malibu Times): Circulation = 12,000, readership estimated 36,000. Malibu times Magazine circulation 25,000; readership estimated at 75,000 (source: personal communication with Malibu Times staff August 9, 2005)
- Commercial (from smartpages.com)
 - Equestrian-Related Businesses (stables, breeders, suppliers): 10
 - Pet Related Businesses (retail, suppliers, grooming): 50
 - Restaurants in J1/4 Areas: 50
 - Septic/Plumbing Services (not necessarily in Malibu Area): 30
 - Approximate distribution of commercial/industrial activity (assumed based on total land use areas)
 - High Priority Subwatershed: 40%
 - Medium Priority Subwatershed: 25%
 - Low Priority Subwatershed: 35%
- On Site Opportunities
 - Public Land Opportunities (within J1/4 agencies): 23 (see Attachment 1)
 - Public Land Opportunities (outside of J1/4 agencies)
 - Schools/Universities: 5
 - State/Federal Parklands (excluding Malibu Creek/Lagoon and Leo Carillo): 5 - El Pescador, La Piedra, El Matador, Point Dume, Robert H. Meyer.
- Behavioral change (change of activities contributing to pollutant loading and exceedances)*
 - Assumed average number of annual impressions required for 10% reduction in pollutant generating activities (reference segmentation study): 3/year (note that this could be 3 impressions for 100% of the population, or 7 impressions for 20% of the population and 2 impressions for 80% of the population)
 - Assumed number of annual impressions required for 25% reduction in pollutant generating activities: 4/year (potentially 7 impressions for 40% of the population, and 2 impressions for 60%)
 - Assumed number of impressions required for 50% reduction in pollutant generating activities: 6/year (potentially 8 impressions for 60% of the population and 3 impressions for 40%; or 7 impressions for 80% and 2 impressions for 20%)
- Assumed reductions based on incentive-based activities as a function of allocated budget*
 - 10% cost – 10% target reduction
 - 25% cost – 25% target reduction
 - 50% cost – 50% target reduction
 - 100% cost – 100% target reduction

*Note: All parameters to be revisited upon additional information. Target reductions assumed to be composite number of allowable exceedances for all areas.

Targeted Monitoring-Based Approach

The Targeted Monitoring-Based Approach (TMBA) adopts some measures of presumptive compliance but incorporates monitoring data and attempts to normalize and extrapolate this monitoring data throughout the region.

The TMBA assumes the development of Annual Interim Compliance Reports that consider a number parameters, and present analyses and discussions of each parameter in order to estimate a reduction in pollutant loadings. These parameters consider:

- Coordinated in-stream monitoring. These data include water quality and flow data, with the first two years being primarily baseline information.
- Extrapolation of source control implementation effectiveness. This involves developing an algorithm, and applying it to extrapolate the effectiveness of activities within a targeted subwatershed that has isolated expected pollutant sources (typically not a high priority watershed), and applying these reductions to other subwatersheds that have similar expected sources.
- Extrapolation of small storm effectiveness. This involves developing and applying an algorithm that recognizes hydrologic variability and normalizes pollutant and hydrologic data for comparison with the benchmark (90th percentile) standard year.
- Hydrologic conditions and variable accountability. This involves better understanding hydrologic responses to better define targeted reductions in exceedances.
- Pilot projects. When on line, Pilot Projects will have raw data which can be analyzed and interpreted using the extrapolation algorithms described above.
- Assessment of progress toward full implementation

The TMBA, while also presumptive in many respects, will provide more results-oriented data by which to make more effective management decisions, to support progress toward compliance and potential adaptive and iterative modifications to the Plan. It is, however, anticipated that the TMB approach may not yield readily significant results until at least the 3rd year of implementation.

GC3. The four regional pilot projects should be accelerated and more detailed schedules for the regional pilot projects should be included.

The schedules for the regional pilot projects should be accelerated for two reasons. First, the agencies should be aggressive in implementing these projects given that the four affected subwatersheds (Ramirez, Las Flores, Corral (Marie Canyon J, and Latigo) are identified as high priorities and require larger reductions to meet TMDL requirements. Second, it is important to determine as soon as possible whether the project concept is feasible. If it is not feasible as proposed, this will provide enough time to redesign the project or identify an alternative regional pilot project or a suite of alternative local pilot

projects that could achieve the same water quality benefits. Furthermore, once a project is deemed feasible, the Water Board recognizes that even with an accelerated pace these projects will take time to design, permit and construct.

The regional pilot projects or equivalent BMPs will ultimately be included in the Municipal Separate Storm Sewer System (MS4) NPDES Permit for Los Angeles County for these subwatersheds. As with the Phase I and II non-structural and structural commitments and pilots, these regional pilot projects need to have more detailed time schedules associated with them that if met will provide a reasonable expectation that the interim milestones and waste load allocations in the TMDL will be achieved.

As discussed above, the Water Board understands the need for flexibility to allow for contingencies associated with project planning and implementation. Therefore, the schedules may be identified as tentative, with the understanding that the schedules may be changed with good cause upon notification to the Water Board. Furthermore, the Water Board understands that further evaluation is necessary to determine the feasibility of the proposed regional pilot projects. If after further evaluation the agencies determine that the regional pilot project is infeasible, the Water Board is willing to consider alternative pilot projects including a suite of local structural solutions as an alternative to these regional pilot projects if it can be demonstrated that they will have an equivalent benefit to water quality. However, the agencies should be prepared to maintain a pace of implementation consistent with what is approved in the final Plan.

Response to GC3:

The initiation of Regional Pilot Projects has been accelerated to begin in Phase 1. Early efforts will consist primarily of pre-feasibility planning studies, which will focus on non-engineering (e.g., right-of-way, jurisdiction, environmental impact) issues. Should any of the Pilot Projects prove infeasible, alternative projects will be identified and proposed to the RWQCB. Because of the relative complexity of design of most projects, however, it is not reasonable at this time to assume design schedules can be accelerated further with one exception. The Las Flores Pilot Project has been accelerated for both initiation and completion.

Tentative detailed project schedules are presented in Appendix B.

GC4. Discuss in more detail how the draft Implementation Plan will achieve the TMDL compliance milestones (i.e. exceedance day reductions at the beach).

The draft Implementation Plan does not directly link the proposed actions to specific percent reductions in exceedance days as required by the TMDL. While admittedly difficult, the draft Implementation Plan should provide an estimate of the reductions that are expected to be achieved or at a minimum a more clear description of why the actions proposed are likely to achieve the required reductions. In particular, the Implementation Plan should demonstrate the linkage between the Phase I and Phase II activities and the 10% reduction interim milestone for the Jurisdictional Groups. This discussion might include the targeting of the highest priority subwatersheds (i.e. those needing the largest

reductions to meet TMDL requirements) for early intervention. Clearly identify through maps and tables which non-structural solutions, structural BMPs and regional pilot projects outlined in the Implementation Plan will be implemented in these different subwatersheds and the timeline for these actions. Discuss how the iterative, adaptive approach and watershed and BMP monitoring will allow further targeting of potential "hot spots".

Response to GC4:

The response to GC2 describes proposed methods for documenting compliance milestones. The following table presents target reductions by phase and subwatershed of exceedance days based on the 90th percentile condition. It should be emphasized that this is a prediction based on limited data for the purposes of quantifying potential improvements on a subwatershed basis.

Table of Target Exceedance Days Reductions

Station	Description	90th Percentile	Allowable	Total Day Reduction	Implementation Schedule			
					10%	25%	50%	100%
DHS 010	Leo Carillo	17	17	0	0	0	0	0
DHS 009	Nicholas	14	14	0	0	0	1	1
DHS 010a	Broad Bch	15	15	0	0	0	1	1
DHS 008	Trancas	19	17	2	1	2	2	3
DHS 007	Westward, e. of Zuma	17	17	0	0	0	1	1
DHS 006	Paradise Cove	23	17	6	1	2	4	6
DHS 005	Latigo Canyon	33	17	16	2	4	8	16
DHS 005a	Corral	17	17	0	1	1	1	3
DHS 001a	Las Flores	29	17	12	1	3	6	12
DHS 001	Big Rock	30	17	13	2	4	8	13
S2	Topanga	26	17	9	2	4	8	12
Target Totals				60	10	20	40	68
Minimum				60	6	13	30	60

GC5. The draft Implementation Plan should replace the requests for additional reopeners with periodic reports to the Water Board on implementation progress, monitoring results and updates to the Implementation Plan.

Reopeners do not need to be specifically built into TMDLs in order to reconsider the TMDL, including its requirements and implementation schedule. Because the Water Board adopts TMDLs as Basin Plan amendments, the Water Board may at its discretion reconsider and amend a TMDL at any time. Instead of scheduled reopeners, the Implementation Plan should recommend periodic reports (annually or at key junctures between phases) to the Water Board on implementation progress, monitoring results, and updates to the Implementation Plan. During these periodic reports, agencies may request that the Water Board reconsider the TMDL if appropriate in light of this new information.

Response to GC5:

The request for additional reopeners has been removed from the Plan. The Interim Compliance Reports will be provided annually and will include recommendations, if warranted, for adjustments to the Plan.

GC6. The draft Implementation Plan should focus on optimizing non-structural solutions given the heavy emphasis on these measures.

The agencies should carefully consider the most effective non-structural solutions given their emphasis in the draft Implementation Plan. Further, the agencies should assess the most effective non-structural solutions and work toward optimizing them based on past lessons learned to achieve the maximum water quality benefits. To effectively deliver public education messages and change behavior, agencies should select target audiences based on the target pollutant, bacteria. Then agencies should evaluate data from two studies conducted by the Los Angeles County Department of Public Works (1997 Stormwater Segmentation Study and 2000 Stormwater Interim Segmentation Study) and identify the target groups most likely to contribute to bacteria loads and most likely to change their behaviors. Many of these non-structural solutions (particularly related to general outreach and education) have been implemented before and some have been shown to be largely ineffective. The Implementation Plan should also discuss in more detail how the agencies intend to work toward improving compliance with existing ordinances that minimize release of bacteria sources among targeted populations.

Response to GC6:

The non-structural elements in the Plan were developed to highlight and target the constituents of concern. As discussed in the response to GC2, a number of measures will be implemented to gauge the effectiveness of non-structural solutions and the Interim Compliance Reports will be the basis of optimization and refinement of the plan. The ongoing segmentation study work conducted in the County, as well as other studies previously referenced will be considered. It should be recognized, however, that the socio-economic status of the residents within the J1/4 agencies cannot be represented by County-wide studies and represents a very small segment of the general population.

GC7. The draft Implementation Plan should provide additional detail on what could be done at school sites that would complement activities at other publicly owned sites.

Though public schools are not within the agencies' jurisdictions, the Implementation Plan should provide additional detail on what could be done at school sites that would complement activities at other publicly owned sites. The Water Board could ultimately consider these recommendations regarding BMPs such as retrofitting schools with green roofs, target levels of pervious surface and institutional programs in subsequent phases of the municipal stormwater permitting program.

Response to GC7:

Public schools are not within the jurisdiction of the J/4 agencies nor are they permittees under the current County-wide MS4 permit. The agencies will commit to contacting and coordinating with the Santa Monica-Malibu Unified School District to discuss potential retrofitting options and to provide support and incentives that would encourage local structural and non-structural solutions. This effort would be analogous to the coordination with other non-J1/4 agencies such as the State of California.

REGIONAL BOARD DETAILED COMMENTS (DC)

DC1. Section 4.3.1. Water Quality Monitoring Recommendations. Winter Low Flow.

Given the high variability observed in bacteria concentrations, samples collected at monthly intervals are unlikely to provide adequate information to characterize winter low flow periods. At a minimum, weekly sampling should be conducted to characterize winter low flow conditions, including average conditions and the variability in bacteria concentrations.

Response to DC1

The intent of Winter Low Flow monitoring efforts is to provide periodic data between winter storm events to assist with wet weather characterization, but not to replace dry weather TMDL implementation monitoring efforts. Therefore, this comment was not incorporated in the final Plan.

DC2. Section 4.3.1. Water Quality Monitoring Recommendations. Winter Storm Flows.

Sampling for storm flows should at a minimum follow the sampling design of the reference beach study conducted by SCCWRP under contract to the Water Board. The sampling design for this study was as follows. There were two sampling locations at each beach. The primary sampling location was in the ocean immediately in front of the freshwater input at the "wave wash" where the watershed discharge initially mixes with the ocean waves. All samples were collected between ankle and knee depth on an incoming wave. The secondary sampling location was from the watershed discharge as it crossed the beach at the closest sampleable location prior to mixing with the ocean. Samples at the primary sampling sites were measured for fecal indicator bacteria and salinity. Samples at the secondary sampling sites were measured for fecal indicator bacteria, salinity and flow. Flow was measured using a hand held velocity meter and estimates of wetted cross-sectional area. Wet weather sampling criteria included three or more days of antecedent dry period and predicted minimum rainfall estimates of 0.10 in. Four samples were collected per site corresponding to the day of the storm (defined as

within 24 hrs of recorded rainfall) and the three days following recorded rainfall (four days of sampling in total). Four storms were targeted based on two factors; size of storm and seasonality. Size of storm was stratified into small storm events (less than median daily rainfall) and large storm events (greater than median daily rainfall) based on historical rainfall at the nearest rain gage. Seasonality was stratified into early season (before December 31 st) and late season (after January 1st) storm events.

Response to DC2

The J1/4 agencies recognize the potential usefulness of conducting additional monitoring, consistent with methods developed by SCCWRP for the RWQCB. While this effort is conceivably worthwhile and necessary, the agencies do not believe it should be included as a requirement of the Implementation Plan.

Two options were presented in the draft Plan. For clarity, the preferred monitoring protocol was selected, and the baseline protocol eliminated from the plan.

The intent of Winter Storm Monitoring was not compliance with TMDL Requirements. Compliance monitoring is addressed in the Coordinated Shoreline Monitoring Plan. The purpose of this effort is to assist with the characterization the effectiveness of non-structural and structural solutions as described previously. For this reason the Plan proposed an enhanced ASCE database protocol, which is consistent with RWQCB recommendations for the adjacent (Santa Monica Bay Beaches Jurisdictional Group 2 and 3) Wet Weather Bacterial Implementation Plan (see Comment 24 of May 6, 2005 letter to Rita Robinson). Therefore, the following text was included in section 4.3 of the Plan:

The monitoring proposed in this Implementation Plan is intended to support cost-effective implementation of control measures. It is not intended to replace reference beach study efforts (conducted by the Southern California Coastal Water Research Project), regulatory compliance monitoring (under the Coordinated Shoreline Monitoring Plan) or currently required Municipal Separate Storm Sewer monitoring efforts. In addition, monitoring is limited to wet-weather activities, as dry weather TMDLs are addressed in a separate implementation plan.

DC3. Section 4.4.1. Natural Area Bacteria Loading Study. A separate natural loadings study is unnecessary, since SCCWRP is currently conducting two natural loadings studies under contract to the Water Board and US EP A. The first is examining natural loadings at beaches, while the second is examining natural loadings to inland surface waters and includes bacteria along with many other naturally occurring constituents. These studies and the use of the findings from these studies should be referenced in the Plan rather than recommending a new study.

Response to DC3

Reference to a Natural Area Bacteria Loading Study has been removed.

ADDITIONAL PLAN ENHANCEMENTS

Though not requested or required, the following additions/revisions were provided to enhance the previously defined Public Agency Activity efforts.

- ***Establish guidelines for optimizing frequency of cleaning cycles for drainage facilities.*** Agencies within J1/4 should review cleaning cycles for drainage facilities relative to what is required by the NPDES permit and develop guidelines for an optimum program. Studies supporting this plan identified stormwater drains in urban areas as the sources of bacteria loading. This BMP could potentially require more equipment and labor to optimize current methods and timing of cleaning cycles. Optimized cleaning cycles could be implemented in coastal areas with higher densities. As a part of this BMP, pre and post-sampling of drains would be required to determine its effectiveness before it is implemented on a larger scale.

This activity will be both planned and implemented during Phase 1 of TMDL implementation.

In Caltrans roadway facilities, recommendations with respect to increasing cleaning frequencies will be coordinated with the City of Malibu and implemented on a limited basis. These efforts are subject to approval through the normal processes with both agencies.

Lead Agencies: Caltrans, City of Malibu, and County of Los Angeles

- ***Caltrans and Malibu Joint Activities.*** City of Malibu and Caltrans will work together toward possible joint efforts to implement trash reduction measures on Pacific Coast Highway, State Route 1, that is heavily used by beach visitors. These measures could include increasing frequencies of street sweeping and trash pickup by entering into a delegated maintenance agreement, instituting Adopt-A-Highway Program for trash pickup by volunteers, and posting litter prohibition signs and special information signs at selected locations.

Lead Agencies: City of Malibu and Caltrans