

# IMPLEMENTATION PLAN

For compliance with the

WET WEATHER  
SANTA MONICA BAY BEACHES BACTERIA  
TOTAL MAXIMUM DAILY LOAD (TMDL)

July 15, 2005

Submitted to

The Los Angeles Regional  
Water Quality Control Board

By  
JURISDICTIONAL GROUP 7

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QUALITY CONTROL BOARD  
LOS ANGELES REGION

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Submitted on behalf of and  
as approved by Jurisdiction Group 7 by:

Dean E. Allison, P.E.  
Director of Public Works  
City of Rancho Palos Verdes

Primary Jurisdiction,  
Jurisdiction Group 7

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## 1.0 EXECUTIVE SUMMARY

On July 15, 2003, the Santa Monica Bay Beaches Bacterial Total Maximum Daily Load (TMDLs) for both wet and dry weather went into effect. As required by the TMDL for Wet-Weather, each Jurisdictional group must develop an implementation plan describing how compliance with the TMDL will be achieved. This Implementation Plan must be submitted to the Regional Board no later than July 15, 2005.

The beaches along the Palos Verdes Peninsula have historically had fewer exceedance days than the reference beach (Leo Carrillo) used by the TMDL to establish compliance. However, the anti-degradation provision of the TMDL does not allow more exceedances than established by historical precedent. Therefore, this implementation plan calls for the continued implementation of BMPs to maintain and improve existing water quality as required under the Municipal Stormwater Permit and its successors.

Should unanticipated exceedances occur, the Memorandum of Agreement (MOA) that the members of Jurisdictional Group 7 will be a party to, contains provisions for investigation, correction and reporting of these exceedances.

## 1.0 Background

### 1.1 Regulatory

The Santa Monica Bay Beaches Bacteria TMDLs have been approved by the Los Angeles Regional Water Quality Control Board in two separate documents, a Wet Weather TMDL and a Dry Weather TMDL. The Dry Weather TMDL has been further divided into two segments; summer dry weather and winter dry weather. The net effect is three distinct compliance schedules:

Wet weather  
Summer dry weather (April 1 – October 31)  
Winter dry weather (November 1 – March 31)

These TMDLs establish a specific number of days for each of the above periods that a beach can have detected exceedances above the REC-1 (recreational use) bacteria levels established by the basin plan.

This Wet Weather TMDL allows a level of exceedances that takes the natural fluctuations of bacterial levels into account. The number of allowable exceedance days is based upon the reference beach (Leo Carrillo) or historical precedent whichever is less. The allowable number of exceedance days based upon the reference beach is 17.

As a requirement of the Wet Weather TMDL, an Implementation Plan must be prepared and submitted to the Regional Board by July 15, 2005. According to the TMDL:

*“Responsible jurisdictions and agencies shall provide a written report to the Regional Board outlining how each intends to cooperatively (through Jurisdictional Groups) achieve compliance with the TMDL. The report shall include implementation methods, and implementation schedule and proposed milestones.”*

## 1.2 Historical Monitoring

The Los Angeles County Sanitation Districts has historically conducted monitoring at eight sampling locations along the Palos Verdes Peninsula beaches. Based on sampling by the Districts over a four-year period, 1997-2000, the TMDL has established that the beaches along the Palos Verdes Peninsula continually had fewer exceedances than the reference beach.

<b>Beach Monitoring Location</b>	<b>Exceedance Days<sup>1</sup></b>
Malaga Cove	14
Bluff cove	0
Long Point	5
Abalone cove	1
Portuguese Bend Cove	2
Royal Palms State Beach	6
White Beach (east)	17*
Wilder Annex	2
Cabrillo Beach (ocean side)	3

\*One additional monitoring location has been added as part of the development of the monitoring plan (separate document). There is no historical monitoring data for this location so the reference beach exceedance days are shown.

The anti-degradation provision of the TMDL does not allow a higher number of exceedance days, even if historical exceedances are less than the reference beach (17 days).

## 1.3 Physical Setting

Jurisdictional Group 7 is primarily comprised of portions of the cities of Los Angeles, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills and Rolling Hills Estates. It encompasses the ocean side of the Palos Verdes Peninsula and extends from the southern border of the City of Torrance to the breakwater of the outer Los Angeles Harbor.

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<sup>1</sup> Values shown are the five-year average exceedance rates calculated by the Regional Board staff and listed in Table 9.3 of the Santa Monica Bay Beaches Wet-weather Bacterial TMDL. The site-specific exceedance rate for each site was multiplied by the number of wet days in the 90<sup>th</sup> percentile storm year of 1993 (the baseline year) in order to arrive at the site-specific exceedance allocation.

The southern jurisdictional boundary of Santa Monica Bay (as established by the U.S. Coast Guard) extends to the outer Los Angeles Harbor breakwater. However, the prevailing “long shore” current which flows along the northern portions of Santa Monica Bay does not continue along the Palos Verdes Peninsula, making Jurisdictional Group 7 hydrologically distinct from the rest of the Santa Monica Bay beaches.

## **2.0 Implementation Plan**

The TMDL allows Jurisdictions to select one of two implementation strategies: integrated resource or non-integrated. As Jurisdictional Group 7 already meets the baseline goals and only needs to implement provisions to prevent “backsliding”; the non-integrated approach will be selected. No milestones are proposed, as existing conditions are the equivalent of compliance with the TMDL.

The implementation plan that the cities of Jurisdictional Group 7 will be employing consists of three primary actions:

### **2.1 Continue to implement BMPs**

Based upon the historical number of exceedance days being less than the reference beach, the Jurisdictional Group 7 cities will continue to implement BMPs with the goal of reducing the number of bacterial exceedance days.

These BMPs will include, but are not limited to: thorough inspections of sites listed as critical sources in the MS4 Permit, prompt response to spills and overflows, requirements that priority development projects treat stormwater runoff in accordance with SUSMP guidelines, regular public outreach, etc.

### **2.2 Review Sanitation Districts’ Data**

The Los Angeles County Sanitation Districts is currently responsible for collecting and analyzing samples from the monitoring locations. The Sanitation Districts has also committed to responding to any high

bacterial levels detected with follow-up sampling. The results of the Sanitation Districts sampling will be regularly reviewed. The Jurisdictional Group intends to explore the feasibility of posting the sampling results on a website accessible to the public.

### 2.3 Investigations

The Memorandum of Agreement developed by the Jurisdictional Group provides funding for investigations. The investigations will be initiated when deemed necessary by the Jurisdictional Group or as directed by the Regional Board.

Jurisdictional Group 7 intends to conduct these investigations in accordance with investigative protocols consistent with the other Santa Monica Bay Jurisdictional Groups (these protocols are yet to be developed). The protocol is assumed to include interviews, photographs, research, sample collection and analysis, etc.

## 3.0 Conclusion

The Beaches of Jurisdictional Group 7 have historically had fewer bacterial exceedance days than the reference beach used by the Wet Weather TMDL. The natural characteristics of the Palos Verdes Peninsula coupled with BMPs that are already being implemented by the municipalities, appear to be an effective combination based on the relatively few historical number of exceedance days. The cities comprising Jurisdictional Group 7 have and will continue to implement BMPs that maintain or reduce the number of wet weather exceedance days. In the event that an excessive number of exceedances occur, the Jurisdictional Group has a mechanism in place to investigate and correct the cause(s).

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