



City of
Santa Monica®

Office of the Director
Public Works Department
1685 Main Street, Room 116
Santa Monica, California 90401

May 7, 2012

Mr. Samuel Unger, P.E.
Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

RE: COMMENTS ON TENTATIVE BASIN PLAN AMENDMENT FOR THE SANTA MONICA BAY BEACHES BACTERIAL TMDL

Dear Mr. Unger:

The City of Santa Monica (City) appreciates this opportunity to provide comments and recommendations to the Los Angeles Regional Water Quality Control Board (Board) on the tentative basin plan amendment for the Santa Monica Bay Beaches Bacterial Total Maximum Daily Load (TMDL). Since the TMDLs went into effect in July of 2003, the City has aggressively pursued compliance through the implementation of numerous strategies such as low flow diversion structures, infiltration systems, green streets, pervious pavement, bird deterrents and many others.

After review of the proposed amendment to the Water Quality Control Plan – Los Angeles Region, the City submits the following comments and recommendations:

Wet Weather Reduction Milestone Formulas – the term “+ sum of allowable number of wet weather exceedance days for each site within the jurisdiction group” should be added to each equation in the footnotes to table 7-4.2b.

Wet Weather Reduction Milestone Calculation – It is not clear how the interim compliance targets were calculated. It appears that the wet weather exceedance reduction milestones were calculated using estimated exceedances based on averages from monitoring results from 2004 to 2010. We recommend setting 2004 -2005 as the critical year and using actual exceedances and allowable exceedances (17 for daily monitoring and 3 for weekly monitoring) to determine the milestones. Jurisdiction Group 3 exceedance reduction milestones would be 229 at 10%, 202 at 25% and 158 at 50% (using the corrected formulas per our prior comment).

SMB 3-9, Strand Location – This location is an open beach with no storm drain outlet. Please clarify the purpose of this monitoring station and why it should be considered in a TMDL that addresses pollution due runoff discharge.

No Discharge = No Violation – The TMDL should include clear language indicating that permittees will not be held in violation for exceedances if data show that no runoff was discharged at the outfall. Data may be readings from flow meters or pressure transducers or photographic records, inspection logs, etc.

Improve Definition of Wet Weather – Redefine wet weather as a 24-hour period within which precipitation is measured to be 0.1 inch. Precipitation of 0.05 inch before a rain gauge reading would be listed as dry weather for that day. If precipitation of 0.06 inches occurred after the reading, this again would be listed as dry weather for the following day. The sum of these two precipitation amounts exceed the 0.1 inch wet weather threshold and may very well result in discharges at the outfall. Without an improved definition in the TMDL, there is no consideration for wet weather in these types of situations and a dry weather exceedance may be recorded against a permittee.

Erratum – The descriptive locations for the sampling stations in Table 3 of the Staff Report dated March, 2012 are incorrect. For Example, SMB 3-1, which is the Montana Avenue station in Santa Monica, is listed as Long Point in Rancho Palos Verdes.

We appreciate your consideration of these comments. If you have any questions, please feel free to contact our Watershed Program Manager, Rick Valte, at (310) 458-8234.

Sincerely,



Martin Pastucha
Director of Public Works