

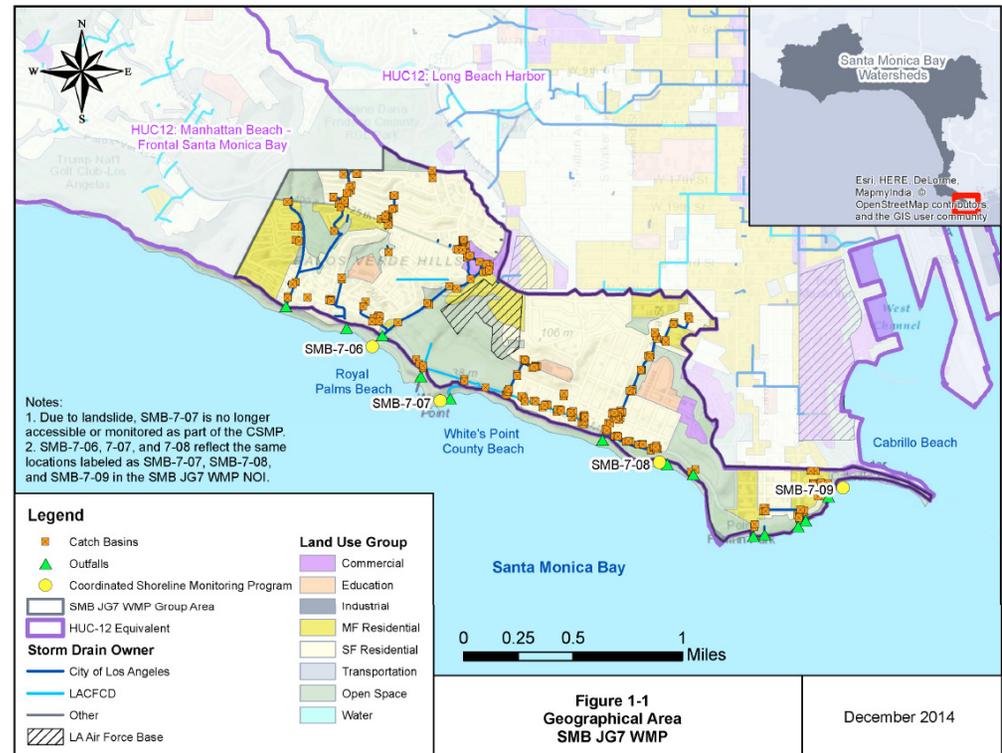
April 13, 2015

Watershed Management Program for Santa Monica Bay Jurisdictional Group 7 within the City of Los Angeles



SMB JG7 WMP Group Overview

- **WMP Group:**
 - City of LA area - 1056 acre
 - LACFCD - storm drains
- **Receiving Waters:**
 - Santa Monica Bay
- **Eleven comments received**

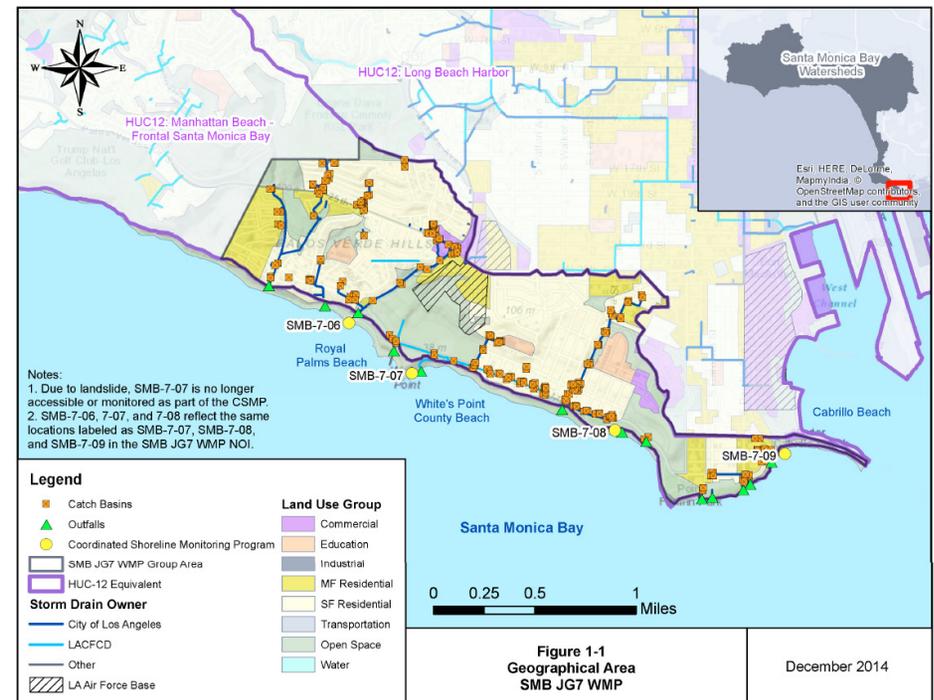


SMB JG7 WMP

Comments Received from RB

1) Include Point Fermin sub-watershed

- *Point Fermin Park Beach sub-watershed added*
- *Expanded the geographical area to 1056 acres*
- *Included SMB 7-09 shoreline monitoring station*



SMB JG7 WMP

Comments Received from RB

2) Further assess 2003 & 2008 Bight data for other sediment bound pollutants of concern in offshore area

Further assessment shows:

- *Offshore bight sediment data not representative of MS4 discharge due to distance from outfalls and proximity to PV shelf superfund site*
- *WQC policy for development of CWA sec 303(d) listing requires sample size of 16 for toxicants and 26 for other pollutants. Bight data do not include qualifying number of samples. Sample size between 3 to 10 for all parameters.*

SMB JG7 WMP

Comments Received from RB

3) Evaluate bacteria TMDL shoreline monitoring data and exceedances

Evaluation shows:

- *With the exception of SMB 7-07, other monitoring sites are non-point source open beach (no outfall)*
- *Investigation of exceedances show local activities as potential cause of exceedances*
- *Exceedances not caused by MS4 discharges*

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Comments Received from RB



*Local activities
potential cause of
bacteria exceedances*



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Comments Received from RB

4) Specify strategy to eliminate non-storm water discharges

CIMP:

- *Outfall screening of significant non-stormwater discharges*
- *Source investigations*

WIMP:

- In case the discharge is prohibited, then the discharge will eliminate through one of the following;
 - a) Source control; b) localized BMP; or c) LFD

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Comments Received from RB

5) Provide interim compliance/Catch basin retrofit schedule

- *Total number of Catch basins to be retrofitted 218*

Catch Basin Retrofit Implementation Schedule

Implementation Goal	Date
57 catch basins opening cover and/or inserts retrofits (cumulative) (26% of load reduction)	December 2015
161 catch basins opening cover and/or inserts retrofits (cumulative) (100% of load reduction)	July 2016

- *Ahead of March 2020 schedule in Debris TMDL*

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Comments Received from RB

6) Provide compliance schedule for EPA TMDL for PBC/DDT

- *TMDL does not include compliance schedule*
 - *Demonstrate compliance thru monitoring*
 - *Determine annual loadings for PBC/DDT*
 - *Compliance determination based on 3-year average*
 - *Report data to RWQCB*

SMB JG7 WMP

Comments Received from RB

Other Comments required either additional information or clarification

- 7) *Include Footnote on fish consumption advisory* ✓
- 8) *Include Language referring to EPA recommendation not to include sediment toxicity as category 2* ✓
- 9) *Include Catch basins and major outfalls map* ✓
- 10) *Include Source assessment language* ✓
- 11) *Provide Legal authority* ✓