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Public Comment
Marina del Rey Toxics TMDL
Deadline: 5/13/14 by 12:00 noon
BUREAU OF SANITATION

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May 13, 2014



VIA EMAIL: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

**TECHNICAL COMMENTS ON THE PROPOSED AMENDMENT TO THE WATER
QUALITY CONTROL PLAN – LOS ANGELES REGION (BASIN PLAN) TO REVISE THE
TOTAL MAXIMUM DAILY LOAD (TMDL) FOR MARINA DEL REY HARBOR TOXIC
POLLUTANTS**

The City of Los Angeles, Bureau of Sanitation (Bureau) appreciates the opportunity to provide technical comments on the proposed amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to revise the Total Maximum Daily Load (TMDL) for Marina del Rey Harbor Toxic Pollutants (Toxics TMDL). While the Bureau appreciates and thanks Regional Board staff for the efforts in developing the Basin Plan and addressing specific Bureau concerns, the Bureau continues to have concern with a technical issue that was included in the Bureau's January 15, 2014 comment letter to the Regional Board. As described herein, the response provided by the Regional Board did not adequately address this concern (the Regional Board indicated that the timeframe is appropriate) and the Bureau is therefore submitting this comment and background information that was presented at the Regional Board Hearing to the State Board for consideration.

ADDITIONAL TIME IS NEEDED FOR COMPLIANCE IN BACK BASIN E

Responsible parties have been developing plans and implementing best management practices (BMPs) to address stormwater discharges to the back basins of the marina since the inception of the TMDL in 2006. The continued implementation of originally planned BMPs, in conjunction with the implementation of new projects under the MS4 permit, has created a need for additional time to complete the projects and assess the resulting water quality improvements. The compliance schedule



currently proposed in the Basin Plan Amendment for the back basins does not allow sufficient time to reasonably assess the effectiveness of implemented BMPs and propose additional management techniques to address any remaining issues.

Background:

The Bureau's strategy for Marina del Rey is based on an integrated water resources approach targeting compliance with all Marina del Rey TMDLs (Toxics, Bacteria, and Debris TMDLs) in a comprehensive and integrated manner by the year 2021.

We submitted our Implementation Plan for the Toxics TMDL in 2011, with a request for approval of the Integrated Water Resource (IWR) approach and a compliance date of 2021 as provided by the 2006 TMDL. However, that extension was not granted by Regional Board, thereby requiring a final compliance date of 2016.

The flagship project in the area is the County's Oxford Basin Project, which treats most pollutants and covers most of the City's watershed. This project is slated to be completed in 2015-16.

Prior to and during construction, the City complements the large Oxford Basin Project by concentrating on distributed BMPs and SUSMP, Institutional Measures (increase street sweeping, source control, etc.), 293 catch basin inserts, and ensuring developers comply with Low Impact Development requirements. Ideally, the extent of treatment of City pollutants will be known by 2016-17 through monitoring after completion of the Oxford Basin Project. This will also give us time to monitor and analyze the impacts of distributed and institutional measures.

Our current planning process is now incorporated into the Enhanced Watershed Management Program (EWMP) for the Marina del Rey watershed. Development of the EWMP will go hand in hand with an analysis of the latest toxic TMDL monitoring data (2010-2013) and other constituents, and an evaluation of the need for additional WQ projects. The City is committed to identify specific additional projects, located in the City, if the EWMP process indicates there is a need for those projects to meet the WLAs. Accordingly, EWMP project implementation would start by 2016, i.e., after approval of the Marina del Rey EWMP by the Regional Board.

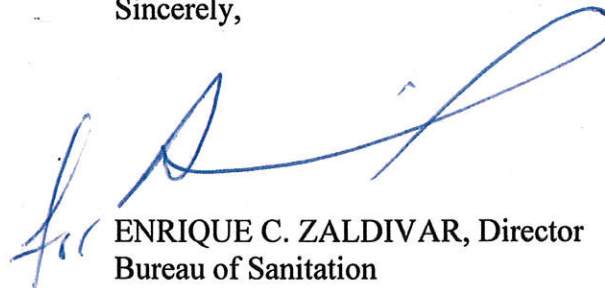
The currently proposed new deadline for Back Basin E is 2018, leaving only 2 years to complete projects identified by the EWMP in order to assure compliance. However, the project cycle for the City typically lasts 4 years to meet established protocols and timelines for design, bid and award, and construction of structural projects. As mentioned earlier, the planning milestone for comprehensive approach to all TMDLs in Basin E is centered around 2021 and this compliance date was requested in our submittal of the 2011 IWR Implementation Plan for the Toxics TMDL.

Requested Action: For Back Basin E, the compliance dates for the 50 percent interim and the final targets be extended from 2016 to 2018 and from 2018 to 2021, respectively.

The Bureau is committed to improving and protecting the local environment as evidenced by the leadership role the City has taken in implementing TMDLs, and in proactively implementing clean water projects throughout City watersheds.

If there any questions, please contact Donna Chen at (213) 485-3928 or Charlie Yu, staff lead on this TMDL, at (213) 485-3929.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Enrique C. Zaldivar', is written over a printed name and title. The signature is stylized with a large loop at the end.

ENRIQUE C. ZALDIVAR, Director
Bureau of Sanitation

ECZ:DC:CY

cc: Sam Unger, California Regional Water Quality Control Board – Los Angeles Region
Deborah J. Smith, California Regional Water Quality Control Board – Los Angeles Region
Renee Purdy, California Regional Water Quality Control Board – Los Angeles Region
Traci Minamide, Bureau of Sanitation/EXEC
Varouj S Abkian, Bureau of Sanitation/EXEC
Adel Hagekhalil, Bureau of Sanitation/EXEC
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Donna Chen, Bureau of Sanitation/WRD
Mas Dojiri, Bureau of Sanitation/EMD
Omar Moghaddam, Bureau of Sanitation/RAD
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