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**REVISION OF CALIFORNIA'S CLEAN WATER ACT**  
**SECTION 303(d) LIST**  
**OF WATER QUALITY LIMITED SEGMENTS**  
**FEBRUARY, 2003**  
**LOS ANGELES COUNTY**  
**DEPARTMENT OF PUBLIC WORKS**



**WATER QUALITY CRITERIA FOR AQUATIC LIFE**

ISSUE	Chronic water quality criteria for aquatic life beneficial uses are inappropriately used to determine impairments for dissolved metals in concrete-lined channels.
LACDPW'S COMMENT	<p>We are concerned about the use of chronic criteria (four days of aquatic life exposure to toxics) as opposed to acute criteria when determining impairments for dissolved metals in concrete-lined flood control channels. Flood control channels are designed to transmit storm water runoffs quickly; therefore, storm water runoffs from a normal storm event do not stay in these channels long enough to give rise to a chronic exposure. Therefore, we believe that acute criteria should be used for these types of water bodies.</p> <p>Our analysis indicates Coyote Creek should be de-listed for dissolved lead since it showed zero (0) percent exceedances of the acute criteria for dissolved lead. We also found that Los Angeles River Reach 1 for dissolved cadmium, San Gabriel River Reach 2 for dissolved lead, and Ballona Creek for dissolved lead should be de-listed when acute criteria are used.</p>



## HYDROLOGIC PATTERNS IN WATER QUALITY

ISSUE

More data should be analyzed over a longer period of time to reflect long-term hydrologic patterns in water quality.

LACDPW'S  
COMMENT

In many cases, data collected during 1997-1998 and 1998-1999 storm seasons were used to determine impairments in the 2002 303(d) list. However, additional data collected under the Los Angeles County Storm Water NPDES Permit monitoring program during 1999-2000, 2000-2001, and 2001-2002 storm seasons was not considered for the development of the 2002 303(d) list.

Our analysis, which included the additional data, indicates that, for example, the San Gabriel River Reach 2 should be de-listed for dissolved zinc, since only 7.5% of samples exceeded water quality objectives as opposed to 13% exceedances without considering the additional data. There were less than 10% exceedances for Los Angeles River Reach 1 for dissolved cadmium, San Gabriel River Reach 2 for dissolved lead, Coyote Creek for dissolved lead and total selenium, and Ballona Creek for dissolved lead and total selenium when additional data were added. We believe these water bodies should be de-listed.

CDPWW

## NON-DETECTS

ISSUE

A laboratory analytical result below Method Detection Limits (non-detect) should not constitute an exceedance.

LACDPW'S  
COMMENT

We notice that the SWRCB and LARWQCB assigned a value of the Method Detection Limit (MDL) or  $\frac{1}{2}$  the MDL to non-detects and counted them as exceedances when their values were higher than water quality objectives. This methodology unjustifiably generates more exceedances for some water bodies and consequently places them on the 303(d) list. For example, Coyote Creek for dissolved lead is listed on the 2002 303(d) list due to 19 exceedances. Our investigation shows that 13 out of the 19 exceedances occurred because of assumed values for non-detects. A non-detect should not constitute an exceedance, as there is no data that evidences an exceedance.

Therefore, we submit that non-detects should not be included in impairment determinations when the criteria are lower than MDLs.

CDPWW

## INSUFFICIENT EXCEEDANCES FOR LISTING

ISSUE

All water bodies that have insufficient exceedances should be placed on the Monitoring List until sufficient data and information for clear impairment determination are collected.

LACDPW'S  
COMMENT

We are concerned that there is no clear, systematic listing and de-listing mechanism used to make consistent monitoring list and impairment decisions. For example, the SWRCB proposes to place Malibu Creek for total selenium on the Monitoring List because there are insufficient exceedances (2 exceedances out of total 21 samples) for an impairment determination. However, Calleguas Creek for nitrite as nitrogen, Santa Clara River for nitrate and nitrite as nitrogen and Los Angeles River for PCBs that were originally on the Monitoring List due to the same reason are now moved from the Monitoring List to the revised 303(d) list without adequate explanation. We request that the SWRCB re-place these water bodies on the Monitoring List.

LDIPWW

## INSUFFICIENT EXCEEDANCES FOR LISTING

LACDPW'S  
COMMENT

Through our analysis, we also found that several additional water bodies were considered impaired on the 2002 303(d) list although they showed marginal exceedances. These water bodies include Los Angeles River Reach 1 for dissolved lead, San Gabriel River Reach 2 for dissolved copper, Coyote Creek and Ballona Creek for dissolved zinc. We request that the SWRCB re-investigate the water bodies that showed marginal exceedances for impairment by placing them on the Monitoring List until sufficient data or evidence is obtained.

LDIPWW

FACT SHEET FOR NEW LISTINGS AND DE-LISTINGS	
ISSUE	Fact sheets, which include the basis for impairment decisions and reasons for listing and de-listing, are only provided for water bodies added to or deleted from the existing 1998 303(d) list. This indicates that the SWRCB and LARWQCB did not consider new water quality data for some water bodies that were moved from the 1998 303(d) list to the 2002 303(d) list.
LACDPW'S COMMENT	We believe that the SWRCB and LARWQCB should evaluate the impairment carried over from the 1998 303(d) list into the 2002 303(d) list using the new water quality data. This would be consistent with what was with the deleted and added impairments that were deleted from or added to the 1998 303(d) list.

FACT SHEET FOR NEW LISTINGS AND DE-LISTINGS	
LACDPW'S COMMENT	<p>We investigated some water bodies on the 2002 303(d) list for which new water quality data was not considered and found that they could be de-listed based on recent data since the last listing cycle. For example, San Gabriel River Reach 2 for dissolved lead was carried over from the 1998 303(d) list to the 2002 303(d) list, but our analysis on data collected during 1997-2002 storm seasons indicated that San Gabriel River Reach 2 for dissolved lead showed only 1.9% exceedances and should be de-listed. We also examined shoreline monitoring bacteria data in Santa Monica Bay collected during 1995 through 2000, and found that several beaches could be de-listed due to the same reason. These beaches include Trancas Beach (Broad Beach), Leo Carrillo Beach, Cabrillo Beach, Hermosa Beach, Malaga Cove Beach, Manhattan Beach, Nicholas Canyon Beach, Royal Palms Beach, and Zuma Beach (Westward Beach).</p> <p>Therefore, we recommend that the SWRCB consider the data collected during 1997-2002 for all listed impairments and not only for additions to and deletions from the 1998 303(d) list.</p>