795

CITY OF LOS ANGELES
CALIFORNIA

ANTONIO R. VILLARAIGOSA
MAYOR

1149 SOUTH BROADWAY, 9TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-2210
FAX: (213) 485-2979

October 18, 2006

Ms. Tam Doduc, Board Chair
State Water Resources Control Board
1001 I Street, Sacramento, CA 95814

Attention Song Her, Clerk to the Board

COMMENTS ON THE PROPOSED 2006 FEDERAL CLEAN WATER ACT SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENTS AND STAFF REPORT

Dear Ms. Doduc:

The City of Los Angeles, Bureau of Sanitation (Bureau) appreciates the opportunity to comment on the State Water Resources Control Board's (SWRCB) proposed 2006 Federal Clean Water Act (CWA) §303(d) List of Water Quality Limited Segments and staff report. The Bureau has previously submitted comments at a SWRCB workshop and hearing on the proposed CWA §303(d) 2006 List and appreciates SWRCB staff response to our past requests and the changes made.

The Bureau commends the effort that SWRCB staff has undertaken to collect and review all readily available environmental data and information and evaluate a portion of these data utilizing the SWRCB Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy).

The Bureau generally supports the State's 2006 CWA §303(d) List. However, after reviewing the proposed changes for the 2006 List, the Bureau is requesting the following revisions:

1. That the SWRCB re-evaluate the 2006 Water Quality Limited Segments utilizing established water quality criteria. Some of the proposed listings do not have any associated water quality criteria to determine impairment. (See Table 1); and

2. That the SWRCB make the revisions as indicated in the SWRCB's Staff Report - Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments and clarify a response. (See Table 2).

In our January 2006 correspondence, we presented a number of issues that may assist in producing more accurate impaired waters listings and also may help all stakeholders in understanding the SWRCB Listing decisions. These issues are still valid and we have included them in the attached Appendix for this proposed List and the next review.

The Bureau believes these changes will result in more accurate listings that will focus scarce public resources on impaired waters to improve water quality and our environment. The Bureau appreciates and thanks the SWRCB and its staff for the effort they have put forth in preparing both the 303(d) List and implementing the new Listing Policy. It is our intention that the attached comments and supporting data will assist the SWRCB to further refine the CWA §303(d) List to the benefit of all of the State's inhabitants.

If you should have any additional questions or comments, please contact Mr. H.R. (Omar) Moghaddam of my staff at (310) 648-5423.

Sincerely,

RITA L. ROBINSON, Director
Bureau of Sanitation

RLR:HRM:GD:JM

Enclosures
cc: Celeste Cantu, State Water Resources Control Board, Executive Officer
Jonathan Bishop, Los Angeles Regional Water Quality Control Board
Michael Mullin, Mayor's Office
Chris Westhoff, City Attorney
Rafael Prieto, Chief Legislative Analyst Office
Cynthia Ruiz, President Board of Public Works
Enrique Zaldivar, Bureau of Sanitation/EXEC
Varouj Abkian, Bureau of Sanitation/EXEC
Traci Minamide, Bureau of Sanitation/EXEC
Mas Dojiri, Bureau of Sanitation/EMD
Shahram Kharaghani, Bureau of Sanitation/WPD
H.R. (Omar) Mogaddam, Bureau of Sanitation/RAD
RAD Central File/Water Quality Section

The Bureau requests:

1. ONE LIST. The preparation of one list would make it clear which listings were evaluated under the State listing policy. The format of the 2006 staff report is confusing as to the overall changes to the 2002 List and the proposed 2006 List. A simple table that identifies by region the 2002 CWA 303(d) listings and includes all the proposed change designators would provide clarity.

   The Bureau requests that one list be prepared for the future Impaired Waters Lists. This Impaired Waters List to be organized by Region and Waterbody would include a column that would identify all the change status designators such a 'List', 'Delist', 'Do Not List', Do Not Delist', 'No Change' and 'Being Addressed'.

2. PREPARE AND UPDATE FACT SHEETS FOR ALL IMPAIRED WATERS LISTINGS. Fact sheets are critical because they provide the rationale for placing waterbodies on or off the 303(d) list. If the Fact Sheets are not present for a Waterbody/pollutant combination the State can not: 1) validate the previous impairment decision, 2) confirm the new listing decision 3) adjust for changes in the development of new water quality criteria, 4) adjust to changes in environmental and receiving water conditions, 5) adjust to the application of the use attainability analysis or site specific objective.

   The Bureau requests that these fact sheets be prepared for the next Impaired Waters List and included in the staff report. Fact sheets should be developed for all listings not just for changes on the list. These fact sheets should be updated biennially, so that stakeholders can be better informed on the reasons for a listing decision and review of water quality trends.

3. DATA MANAGEMENT: The current process for a data records review is problematic. In anticipation of the 303(d) Listing process, the Bureau requested copies of all data submitted to the SWRCB for Region 4 that was to be considered as part of the process. Much of the data and information received by the Bureau was in the form of printed spreadsheets that had been reduced in size to fit on a letter sized page making it illegible. From the recordkeeping perspective, the RWQCBs and the SWRCB should consider posting all information that was used in previous listings and the 2006 Listing on the SWRCB's website. By providing public access to this information, the public can view all lines of evidence used in the decision-making process which provides transparency to the 303(d) listing process. In particular, some of the old listings carried over from the 1996, 1998 and 2002 lists do not identify the reports and information used to make the original listing decision. We appreciate the SWRCB's efforts to correct some of these early faulty listings in the 2006 Listing process. However, we believe that a more thorough review of earlier listings is warranted. By providing the reports and information used to make these early listing decisions on the SWRCB's website, members of the public can review the listings that are of concern to them.

The Bureau requests that an updated records repository system be prepared to retain legible and accurate records of data required to make the listing decisions and that this system be made available to public.

4. MAPPING: Map the data used for the future Impaired Waters List analysis by sample location and geocode.

5. REVIEW OF UNEXAMINED WATER QUALITY LIMITED SEGMENTS: To ensure an accurate Impaired Waters List that is completely consistent with the 2004 State Listing Policy and clearly identifies impaired waterbodies in California, the SWRCB should review and revise the remaining unexamined Water Quality Limited Segments under the new Listing Policy. Until adoption of the 2004 State Listing Policy, there had been no standardized procedure for listing waterbodies on the CWA 303(d) List (federal or state). Due to the absence of a standardized procedure, the Bureau agrees with SWRCB staff that many of the waterbody/pollutant combinations were improperly listed on the 1998 and 2002 Lists which are now being carried forward onto the new CWA 303(d) Lists. Faulty listings may be caused by judgment errors, such as choosing an insufficiently small data set or absence of data, accepting data whose origin was from samples collected and analyzed using improper analytical methods or without approved quality assurance/quality control procedures, data collected outside of a waterbody segment, use of unapproved criteria or guidelines, or evidence that natural sources have caused or contributed to the impairment. In order to avoid similar problems in the future, we believe that the SWRCB should take this opportunity to completely evaluate all previous listings by the application of listing criteria in the State's 2004 Listing Policy.

   The Bureau requests that all listed waterbody/pollutants combinations be examined under the listing criteria of 2004 State Listing Policy. As an alternative the Bureau requests that the waterbody/pollutant segments identified in the Appendix be reviewed under the listing requirements in the 2004 Listing Policy (see Appendix Table 3).

6. USE A PRIMARY LINE OF EVIDENCE IN CONJUNCTION WITH THE TMDL: A primary line of evidence used in conjunction with a TMDL will satisfy Section 2.2 or Section 3.11 of the Listing Policy. Referencing a TMDL does not provide information to evaluate the original listing or subsequent listing decision. Without the supporting data included in the Staff Report, stakeholders can not verify if the conditions for placement in the water quality limited segments category have been met in the first place or if water quality standards have been attained. This includes listings placed in the 'Being Addressed' category.

   The Bureau requests that the data used to make the initial impairment determination be included in the Staff report and used in conjunction with a TMDL. (see Appendix Table 4).

7. CONDITION LISTINGS WITH NO ASSOCIATED WATER QUALITY CRITERIA: The Bureau supports the SWRCB in recommending that a number of waterbody listings for conditions be deleted from the 303(d) list as they are not consistent with the Listing

Policy. Waters listed for algae, odor, debris, enteric virus, scum/foam or beach closure are inappropriate because these are waterbody conditions and not pollutants as required by 40 CFR §130.7(b)(4) or the 2004 Listing Policy. For the 2006 List, the SWRCB may have missed some of these listings.

The Bureau requests that waterbodies listed for a condition be evaluated using established water quality criteria (see Appendix Table 1).

8. LISTINGS FOR TROPHIC STATUS: Criteria are not available to determine impairment for trophic conditions (eutrophic, mesotrophic and oligotrophic waterbodies). Currently the term Eutrophic is used to mean many different things; some may use it to indicate the relative level of nutrient concentrations, others use them (particularly the "eutrophic" adjective) as shorthand for the effects of severe nutrient enrichment (e.g., low DO, high organic detritus levels, fish kills, pH exceedances, etc.). These terms are used without explanation. Often a water body gets a "eutrophic" listing simply because it receives anthropogenic sources of nitrogen and phosphorus with no demonstration of actual impairment of beneficial uses.

   The Bureau requests that the eutrophic listing be evaluated as it does not meet the requirements of the Listing Policy Section 2 and Section 6.1.3 (see Appendix Table 5).

9. SEASONAL VARIATION: As a note of caution - many of the listings in Region 4 rely mainly on data collected during storm events. In general, storm events in Region 4 are brief and the data collected represents pollutant issues associated with dry weather deposition. Storm water data in the Los Angeles area does not identify detrimental conditions to aquatic life or human health in these channels during these brief episodes. Thus, the data is not representative of daily conditions in Southern California waterbodies.

   The Listing Policy contains clear guidance regarding the temporal representation of data and how it should be used to evaluate listing decisions. Data samples during episodic storm events do not represent critical timing for impacts to Southern California waterbodies. The Bureau has reviewed the SWRCB's proposed listings and have identified several proposed listings that are based on the SWRCB's reliance on stormwater event data. *(see Appendix Table 6).*

Table 1

Pollutant Identification and Conditions Listings

Comments on the proposed 2006 303d List
City of Los Angeles
Bureau of Sanitation

New Water Body Name	Pollutant/ Stressor	State decision	BOS Proposed Status
Echo Park Lake	Algae	Silent	Evaluate under Listing Policy
Machado Lake (Harbor Park Lake)	Algae	Silent	Evaluate under Listing Policy
Los Angeles River Reach 1 (Estuary to Carson Street)	Nutrients (Algae)	List	Evaluate under Listing Policy
Los Angeles River Reach 2 (Carson to Figueroa Street)	Nutrients (Algae)	List	Evaluate under Listing Policy
Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Nutrients (Algae)	Silent	Evaluate under Listing Policy
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Nutrients (Algae)	Silent	Evaluate under Listing Policy
Los Angeles River Reach 5 (within Sepulveda Basin)	Nutrients (Algae)	Silent	Evaluate under Listing Policy
Echo Park Lake	Odors	Silent	Evaluate under Listing Policy
Lincoln Park Lake	Odors	Silent	Evaluate under Listing Policy
Machado Lake (Harbor Park Lake)	Odors	Silent	Evaluate under Listing Policy
Los Angeles River Reach 5 (within Sepulveda Basin)	Oil	Silent	Evaluate under Listing Policy
Ballona Creek	Enteric Virus	Silent	Evaluate under Listing Policy
Los Angeles/ Long Beach Inner Harbor	Beach Closures	Silent	Evaluate under Listing Policy
Santa Monica Bay Offshore/Nearshore	Debris	Silent	Evaluate under Listing Policy

Table 2

Revision not completed as indicated in SWRCB response

Comments on the Proposed 2006 303d List
City of Los Angeles
Bureau of Sanitation

Comment No.	Summary of Comment	Response	BOS Evaluation October 2006
73.119	Los Angeles River Reach 1 (Estuary to Carson Street)-Zinc, Dissolved: 'It cannot be determined if the data the State used in its analysis Total Metals data or Dissolved Metals data or if the Hardness values were present and utilized. The most conservative applicable water quality criterion for dissolved zinc is 170 µg/L for the CTR Aquatic Life Freshwater Acute (CMC) objective. In Los Angeles River Reach 1 (Estuary to Carson Street), the criterion was exceeded in 0 of 54 samples, which is 0% of the sample events. Under the State's Listing Policy, a water body is eligible for delisting for dissolved zinc if there are 4 or fewer exceedances out of the 54 samples. Newer data indicate that an evaluation under the Listing Policy is warranted.' The State Board recommendation for this pollutant water body combination is 'do not delist'.	When combining this new data with existing data, there are 7 out of 72 samples which exceed the CTR CCC for dissolved copper. This is still too many to delist.	The comment was for zinc listing. The response does not address the comment but addresses copper listing. The review of the fact sheet for zinc shows that there were 18 samples collected by LACDPW in 2003 and 2004 exceeding 7 samples for both acute and chronic criteria making it eligible for listing. The fact sheet needs to be updated to incorporate newer data and listing decision.
73.142	Los Angeles River Reach 5 (within Sepulveda Basin)-Oil: 'This Listing does not meet the requirements of Section 2 or 3.7 of the Listing Policy. There are no data in the record to evaluate. Based on the readily available information, the weight of evidence indicates that there is sufficient justification in favor of removing these listing from the 303(d) Water Quality Limited Segment list because the segment pollutant combinations is not a pollutant. The state has not identified a beneficial use for protection or impairment.' The State Board did not prepare a fact sheet for this pollutant water body combination. This listing has been modified as it should be for 'Scum/Foam-Unnatural' and it is being recommended for delisting from the 303(d) list.	This listing has been modified as it should be for 'Scum/Foam-Unnatural' and it is being recommended for delisting from the 303(d) list. The original line of evidence supporting the listing does not identify a pollutant but rather, a condition caused by a pollutant(s).	The 303 (d) list has not been modified to reflect the Los Angeles River Reach 5 (within Sepulveda Basin)-Oil as 'Delist' as indicated in the response to the comment.

Table 3

Review Unexamined Water Quality Limited Segments

Comments on the proposed 2006 303d List
City of Los Angeles
Bureau of Sanitation

New Water Body Name	Pollutant/ Stressor	State specified Beneficial Use	RB Potential BU	RB Exisitng BU	State Comment	State decision
Aliso Canyon Wash	Selenium	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD	No Comment	Silent
Arroyo Seco Reach 1 (LA River to West Holly Ave.)	Trash	None identified by the State	MUN, WARM, WILD	REC1, REC2	No Comment	Silent
Arroyo Seco Reach 1 (LA River to West Holly Ave.)	High Coliform Count	None identified by the State	MUN, WARM, WILD	REC1, REC2	No Comment	Silent
Ballona Creek	Toxicity	None identified by the State	MUN, REC1, WARM	REC2, WILD	No Comment	Silent
Ballona Creek	High Coliform Count	None identified by the State	MUN, REC1, WARM	REC2, WILD	No Comment	Silent
Ballona Creek	Enteric Viruses	None identified by the State	MUN, REC1, WARM	REC2, WILD	No Comment	Silent
Ballona Creek Estuary	Shellfish Harvesting Advisory	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Estuary	Sediment Toxicity	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Estuary	High Coliform Count	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Estuary	PAHs (sediment)	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Wetlands	Hydromodification	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Trash	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Reduced Tidal Flushing	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Habitat alterations	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Exotic Vegetation	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Burbank Western Channel	Trash	None identified by the State	MUN, REC1, WARM, WILD	REC2	No Comment	Silent
Castlerock Beach	Bacteria Indicators	None identified by the State			No Comment	Silent
Compton Creek	Copper	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Compton Creek	Lead	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Compton Creek	High Coliform Count	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Dominguez Channel (above Vermont)	Ammonia	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	Chromium (sediment)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	Lead (tissue)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	PAHs (sediment)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	PCBs (tissue)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (Estuary to Vermont)	Ammonia	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Dominguez Channel (Estuary to Vermont)	Benthic Community Effects	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent

Dominguez Channel (Estuary to Vermont)	High Coliform Count	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Echo Park Lake	Copper	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Lead	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Ammonia	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	pH	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Eutrophic	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Odors	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Algae	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	PCBs (tissue)	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Lead	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Ammonia	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Organic Enrichment/Low Dissolved Oxygen	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Eutrophic	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Odors	None identified by the State		MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Los Angeles / Long Beach Inner Harbor	Sediment Toxicity	None identified by the State		IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
Los Angeles / Long Beach Outer Harbor (inside breakwater)	PCBs	None identified by the State		NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
Los Angeles Harbor - Inner Cabrillo Beach Area	Beach Closures (Coliform)	None identified by the State		NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	No Comment	Silent
Los Angeles Harbor Consolidated Slip	Sediment Toxicity	None identified by the State		REC1, REC2, COMM, MAR, RARE, EST, MIGR, SPWN, WILD, NAV	No Comment	Silent
Los Angeles Harbor Consolidated Slip	Benthic Community Effects	None identified by the State		REC1, REC2, COMM, MAR, RARE, EST, MIGR, SPWN, WILD, NAV	No Comment	Silent
Los Angeles River Reach 1 (Estuary to Carson Street)	Aluminum, Total	None identified by the State		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	No Comment	Silent
Los Angeles River Reach 1 (Estuary to Carson Street)	High Coliform Count	None identified by the State		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	No Comment	Silent
Los Angeles River Reach 2 (Carson to Figueroa Street)	High Coliform Count	None identified by the State	MUN, IND, WILD	GWR, REC1, REC2, WARM	No Comment	Silent
Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Nutrients (Algae)	None identified by the State	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Nutrients (Algae)	None identified by the State	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	High Coliform Count	None identified by the State	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 5 (within Sepulveda Basin)	Nutrients (Algae)	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 5 (within Sepulveda Basin)	Oil	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent

Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	High Coliform Count	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	Dichloroethylene / 1,1-DCE	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	Trichloroethylene / TCE	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Ammonia	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Eutrophic	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Odors	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Trash	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Algae	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	ChemA (tissue)	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Marina del Rey Harbor - Back Basins	Fish Consumption Advisory	None identified by the State	REC1	NAV, REC2, COMM, MAR, WILD, RARE, SHELL	No Comment	Silent
Marina del Rey Harbor - Back Basins	Sediment Toxicity	None identified by the State	REC1	NAV, REC2, COMM, MAR, WILD, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Chromium (sediment)	None identified by the State		IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Copper (sediment)			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	PAHs (sediment)			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Sediment Toxicity			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Zinc (sediment)			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	Debris	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	Fish Consumption Advisory	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	Sediment Toxicity	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	DDT (tissue & sediment)	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Canyon	Lead	None identified by the State	MUN, REC1, WARM, WILD	REC2	No Comment	Silent
Sepulveda Canyon	Lead	None identified by the State		WARM, WILD	No Comment	Silent
Sepulveda Canyon	Ammonia	None identified by the State			No Comment	Silent
Torrance Carson Channel	Copper	None identified by the State	NAV	REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Torrance Carson Channel	Lead	None identified by the State	NAV	REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Torrance Carson Channel	High Coliform Count	None identified by the State	NAV	REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Tujunga Wash (LA River to Hansen Dam)	Copper	None identified by the State	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent
Tujunga Wash (LA River to Hansen Dam)	Ammonia	None identified by the State	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent
Tujunga Wash (LA River to Hansen Dam)	Trash	None identified by the State	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent

Tujunga Wash (LA River to Hansen Dam)	High Coliform Count	*None identified by the State*	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent
Venice Beach	High Coliform Count	None identified by the State		NAV, REC1, REC2, COMM, MAR, WILD, RARE, MIGR, SPWN, SHELL	No Comment	Silent
Will Rogers Beach	High Coliform Count	*None identified by the State*	SPWN	NAV, REC1, REC2, COMM, MAR, WILD, SHELL	No Comment	Silent
Wilmington Drain	Copper	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent
Wilmington Drain	Lead	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent
Wilmington Drain	Ammonia	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent
Wilmington Drain	High Coliform Count	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent

Table 4

Use Primary LOE in conjunction with TMDL

Comments on the proposed 2006 303d List
City of Los Angeles
Bureau of Sanitation

Ref. No.	New Water Body Name	Pollutant/ Stressor	State specified Beneficial Use	RB Potential BU	RB Exisitng BU	State Comment	TMDL as single LOE
2	Ballona Creek	Trash	REC2	MUN, REC1, WARM	REC2, WILD	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. The weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
3	Cabrillo Beach (Outer)	Indicator Bacteria	REC1		NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	A TMDL is in place. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
4	Compton Creek	pH	REC2	MUN	GWR, REC1, REC2, WARM, WILD, WET	A TMDL is in place. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
5	Dockweiler Beach	High Coliform Count	REC1		IND, NAV, REC1, REC2, COMM, MAR, WILD, SPWN	*One line of evidence is available in the administrative record to assess this pollutant. Based on the* applicable factor, a TMDL has been developed and approved by USEPA and an approved implementation is expected to result in attainment of this standard.	x
6	Echo Park Lake	Trash	REC2		MUN, REC1, REC2, WARM, WILD	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
7	Lincoln Park Lake	Trash	REC2		MUN, REC1, REC2, WARM, WILD	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
8	Los Angeles River Reach 1 (Estuary to Carson Street)	Trash	REC2		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record *shows that standards are met. Sufficient justification in favor of placing this water segment-pollutant* combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
9	Los Angeles River Reach 1 (Estuary to Carson Street)	pH	WARM		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	One line of evidence is available in the administrative record. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard.	x
10	Los Angeles River Reach 1 (Estuary to Carson Street)	Nutrients (Algae)	WARM		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	Sufficient justification in favor of placing this water segment-pollutant combination on the 303(d) list. Other related lines of evidence are available in the administrative record to assess this pollutant. A TMDL and implementation plan has been approved for this water segment-pollutant combination. The Los Angeles River Nitrogen TMDL was approved by RWQCB on August 19, 2003 and subsequently approved by USEPA on March 18, 2004.	x

11	Los Angeles River Reach 2 (Carson to Figueroa Street)	Trash	REC2, WARM, WILD, WET	MUN, IND, WILD	GWR, REC1, REC2, WARM	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
12	Los Angeles River Reach 2 (Carson to Figueroa Street)	Ammonia	WARM	MUN, IND, WILD	GWR, REC1, REC2, WARM	This pollutant is being considered for listing under section 2.2 of the Listing Policy. Under this section of the Policy, a minimum of one line of evidence is needed to assess listing status. the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
13	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Ammonia	REC2	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. sufficient justification in favor of placing this water segment-pollutant combination in the *Water Quality Limited Segments Being Addressed portion of the section 303(d) list.*	x
14	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Trash	REC2, RARE, WARM, WET	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
15	Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Ammonia	REC2	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. The nutrient(algae), foam, and odor listings are backed by ammonia data. Nutrient(algae), foam, and odor information should not be placed on the section 303(d) list because they are not pollutants or toxicity (section 2 of the Listing Policy). *sufficient justification in favor of placing this water segment-pollutant combination in the Water* Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
16	Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Trash	REC2, WARM, WILD, WET	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
17	Los Angeles River Reach 5 (within Sepulveda Basin)	Ammonia	WARM	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. The nutrient(algae), foam, and odor listings are backed by ammonia data. Nutrient(algae), foam, and odor information should not be placed on the section 303(d) list because they are not pollutants or toxicity (section 2 of the Listing Policy). sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
18	Los Angeles River Reach 5 (within Sepulveda Basin)	Trash	COLD, EST, MAR, MIG, REC2, RARE, SAL, SPWN, WARM, WET, WILD	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x

Table 4

Use Primary LOE in conjunction with TMDL

19	Marina del Rey Harbor - Back Basins	High Coliform Count	REC1	REC1	NAV, REC2, COMM, MAR, WILD, RARE, SHELL	One line of evidence is available in the administrative record. After review of the available data and information for this recommendation, SWRCB staff conclude that the water body should be placed in the Water Quality Limited Segments Being Addressed category of the section 303(d) list because a TMDL has been approved by USEPA and an implementation plan has been approved.	x
21	Marina del Rey Harbor Beach	Indicator Bacteria	REC1		NAV, REC1, REC2, COMM, MAR, WILD, RARE	Two lines of evidence are available in the administrative record to assess this pollutant. Based on the applicable factor, a TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
22	Santa Monica Beach	High Coliform Count	REC1		NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
23	Santa Monica Canyon	High Coliform Count	MUN, REC1, REC2, WARM, WILD	MUN, REC1, WARM, WILD	REC2	Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
24	Sepulveda Canyon	High Coliform Count	REC1		REC1, REC2	Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x

Listings for Trophic Status

New Water Body Name	Pollutant/ Stressor	State decision	BOS Proposed Status
Echo Park Lake	Eutrophic	Silent	Evaluate under Listing Policy
Lincoln Park Lake	Eutrophic	Silent	Evaluate under Listing Policy
Machado Lake (Harbor Park Lake)	Eutrophic	Silent	Evaluate under Listing Policy

Table 6

Stormwater Data Only

New Water Body Name	Pollutant/ Stressor	State decision	BOS Proposed Status
Los Angeles River Reach 1 (Estuary to Carson Street)	Copper	List	Stormwater data only
Los Angeles River Reach 1 (Estuary to Carson Street)	Zinc	List	Stormwater data only