



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

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Project Number 10503614

Prepared for:
City of Los Angeles
Los Angeles County Flood Control District

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Executive Summary

The National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit No. R4-2012-0175 (Permit) was adopted November 8, 2012 by the Los Angeles Regional Water Quality Control Board (Regional Board) and became effective December 28, 2012. The purpose of the Permit is to ensure the MS4s in Los Angeles County are not causing or contributing to exceedances of water quality objectives set to protect the beneficial uses in the receiving waters in the Los Angeles region.

The Permit allows Permittees to customize their stormwater programs through the development and implementation of a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to achieve compliance with receiving water limitations (RWLs) and water quality-based effluent limits (WQBELs). The City of Los Angeles (City) and the Los Angeles County Flood Control District (LACFCD), collectively referred to as the SMB JG7 WMP Group, pursue a WMP to fulfill the requirements of the MS4 Permit. The primary reasons for this request included: 1) MS4 discharges to Santa Monica Bay are anticipated to be minimal due to the small contributing drainage areas; and 2) opportunities for structural best management practice (BMP) implementation are limited due to the geography of the WMP area (e.g., cliffs at outfalls, landslide and liquefaction hazards, etc.). In December of 2013, the SMB JG7 WMP Group submitted a revised notice of intent to develop a WMP for the City of Los Angeles land area within JG7 of the Santa Monica Bay Watershed. This WMP, in combination with the SMB JG7 Coordinated Integrated Monitoring Program (CIMP), was prepared to satisfy Part C.1.f of the Permit, which includes the following tasks:

1. Prioritize water quality issues resulting from stormwater and non-stormwater discharges from the MS4 to receiving waters within each Watershed Management Area (WMA);
2. Identify and implement strategies, control measures, and BMPs to achieve the outcomes specified in Part VI.C.1.d;
3. Execute an integrated monitoring program and assessment program pursuant to Attachment E – MRP, Part VI to determine progress towards achieving applicable limitations and/or action levels in Attachment G;
4. Modify strategies, control measures, and BMPs as necessary based on analysis of monitoring data collected pursuant to the monitoring and reporting program (MRP) to ensure that applicable WQBELs, RWLs, and other milestones set forth in the WMP are achieved in the required timeframes; and
5. Provide appropriate opportunity for meaningful stakeholder input, including but not limited to, a permit-wide watershed management program technical advisory committee (TAC) that will advise and participate in the development of the WMPs and EWMPs from month 6 through the date of program approval.

WATERSHED CHARACTERIZATION

The SMB JG7 WMP Group area is located within the southern portion of the 414-square mile Santa Monica Bay Watershed, including the Santa Monica Bay and land area that drains into the Bay. The boundary of the Santa Monica Bay, as defined for the National Estuary Program, extends from the Los Angeles/Ventura County line to the northwest, and southeast to Point Fermin on the Palos Verdes Peninsula. The land area that drains into the Bay follows the crest of the Santa Monica Mountains on the north to Griffith Park, extends south and west across the Los Angeles coastal plain to include the area east

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of Ballona Creek and north of the Baldwin Hills. South of Ballona Creek, the natural drainage is a narrow coastal strip between Playa del Rey and Palos Verdes (Regional Board, 2011).

The JG7 area includes the Cities of Rancho Palos Verdes, Palos Verdes Estate, Rolling Hills, Rolling Hills Estate, and the City of Los Angeles. This WMP only addresses the 1,056-acre area owned by the City within JG7, which includes the following water bodies as identified in the Basin Plan:

- Santa Monica Bay – Nearshore Zone
- Royal Palms Beach
- White’s Point County Beach
- Point Fermin Park Beach (not listed in Basin Plan)

IDENTIFICATION OF WATER QUALITY PRIORITIES

The water quality prioritization process of the Permit determines the Water Body-Pollutant Combinations (WBPCs) that will be addressed within the WMP area. Section IV.C.5(a)ii of the permit defines several categories of WBPCs to be used to prioritize WBPCs in order to guide the implementation of structural and institutional BMPs: **Category 1** (highest priority) are those subject to an established Total Maximum Daily Load (TMDL); **Category 2** (high priority) are those on the State Water Resources Control Board (SWRCB) 2010 Clean Water Act (CWA) Section 303(d) list or those constituents that have sufficient exceedances to be listed; and **Category 3** (medium priority) are those with observed exceedances, but at a rate too infrequent to be listed.

A detailed monitoring data analysis was conducted to:

1. Evaluate the status of TMDL compliance;
2. Evaluate the status of 303(d) listings (i.e., whether any WBPCs meet the SWRCB’s 303[d] delisting criteria);
3. Identify other WBPCs that meet 303(d) listing criteria; and
4. Identify remaining WBPCs demonstrating exceedance(s) of applicable receiving water limitations through the use of Monitoring and Bight data.

The outcome of the preliminary water quality prioritization is summarized in **Table ES-1**. WBPCs are listed in order of compliance deadline with interim and final deadlines included. There were no Category 2 or 3 WBPCs identified within the SMB JG7 WMP Group area.

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Table ES-1
Water Body-Pollutant Prioritization
 (Listed in order of compliance deadline, interim, and final are included.
 Passed deadlines are shown in bold font)

Category	Water Body	Pollutant	Compliance Deadline
1	SMB Beaches	Summer dry weather bacteria	7/15/2006 for single sample AEDs
		Winter dry weather bacteria	7/15/2009 for single sample AEDs
		Wet weather	7/15/2013 for single sample AEDs¹ 7/15/2013 for geometric mean (GM)¹
	SMB Offshore/ Nearshore	Debris	3/20/2016 (20% load reduction)
			3/20/2017 (40% load reduction)
			3/20/2018 (60% load reduction)
			3/20/2019 (80% load reduction)
			3/20/2020 (100% load reduction)
	SMB	DDTs	[No compliance deadline specified in TMDL] ^{2,3}
		PCBs	[No compliance deadline specified in TMDL] ^{2,3}
2	No Category 2 WBPCs have been identified at this time		
3	No Category 3 WBPCs have been identified at this time		

¹ Per Resolution 2006-008, the JG7 agencies elected to pursue a non-integrated water resources approach to SMBBB TMDL compliance, which resulted in a final wet weather compliance deadline of at most 10-years, or July 15, 2013. http://63.199.216.6/larwqcb_new/bpa/docs/2006-008/2006-008_RB_RSL.pdf

² Although the TMDL lacks a formal compliance schedule for the WLAs, Table 6-5 of the TMDL does specify a timeline for the DDT/PCB targets in water and sediment. Additionally, the WLA target was set at the existing waste load, so antidegradation conditions exist.

³ Contamination of DDT and PCBs in the sediments of the Santa Monica Bay has led to a 303(d) listing of Fish Consumption Advisory. The Santa Monica Bay TMDL for DDTs and PCBs issued in 2012 addresses the impairment to human health consumption due to DDT and PCBs in the Santa Monica Bay from Point Dume to Point Vicente and the Palos Verde Shelf from Point Vicente to Point Fermin.

REASONABLE ASSURANCE ANALYSIS

The Category 1 WBPCs identified for the JG7 SMB WMP include bacteria at the Santa Monica Bay Beaches, debris in the Santa Monica Bay Offshore/Nearshore, and polychlorinated biphenyls (PCBs) and dichlorodiphenyltrichloroethanes (DDTs) in the Santa Monica Bay. The three existing bacteria TMDL compliance monitoring locations (SMB 7-6, SMB 7-8, and SMB 7-9) are all open beach and antidegradation locations. SMB 7-7 has not been accessible or monitored since 2011 due to a landslide. Because the monitored locations are open beach monitoring locations, they have no definable drainage areas. As antidegradation sites, all three locations have an implied zero load reduction as compared to the reference beach. Therefore, compliance is demonstrated through a non-quantitative Reasonable Assurance Analysis (RAA). Similarly, for PCBs and DDTs the U.S. Environmental Protection Agency (USEPA) TMDL indicates that the current load for Santa Monica Bay is less than the required load; therefore, a zero load reduction is required for those parameters, demonstrating compliance through a non-quantitative RAA. Consistent with Section VI.E.5.b.i of the MS4 Permit, compliance with the Debris TMDL will be met through a phased retrofit of the City's catch basins in the SMB JG7 WMP area. The City has committed to retrofit the number of catch basins at a faster rate than required per the Regional Board implementation goals, with the goal of 100% of catch basins in the JG7 WMP area being retrofitted by July 2016. The City's Trash Monitoring and Reporting Plan (TMRP) (2012) states, "*vertical insert[s] with 5-mm openings and flow activated opening screen covers are the best suited for implementation*

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within the City to achieve compliance with Trash TMDLs.” There are no industrial facilities within the SMB JG7 WMP area that use, store, transport, manufacture, or handle plastic pellets. Therefore, the City’s Plastic Pellet Monitoring and Reporting Plan (PMRP) only includes an emergency response plan.

As part of the adaptive management process, and as additional monitoring data is collected as part of the approved CIMP, if a quantitative RAA utilizing BMP performance data becomes necessary, then an appropriate RAA approach would be determined at that time.

WATERSHED CONTROL MEASURES

Development of the WMP requires identification of structural or institutional BMPs expected to be sufficient to meet receiving water and effluent limitations set forth in the Permit. BMPs vary in function and type, with each BMP providing unique design characteristics and benefits from implementation. The overarching goal of BMPs in the WMP is to reduce the impact of stormwater and non-stormwater on receiving water quality.

There are currently 218 catch basins within the City of Los Angeles JG7 WMP area, with 57 planned to be retrofitted by December 2015. The remaining 161 catch basins will be retrofitted by July 2016. With the exception of these planned catch basin retrofits, which are considered to be distributed BMPs, there are no other regional or distributed structural BMPs existing or planned at this time. Through the adaptive management process, regional and/or distributed BMPs may be proposed if CIMP monitoring demonstrates that pollutant loads exceed the WQBELs or RWLs previously discussed. At this time, a quantitative RAA is not being presented due to zero load reduction requirements and alternative compliance measures.

The Permit (Parts VI.D.4 through VI.D.10) requires the implementation of new Minimum Control Measures (MCMs), while also requiring that currently implemented MCMs continue until the City of Los Angeles portion of SMB JG7 WMP is approved by the Regional Board. The existing MCMs, much like those proposed in the Permit, are comprised of six categories including:

- Public information and participation program;
- Industrial/commercial facilities program;
- Development planning program;
- Development construction program;
- Public agencies activities program; and
- Illicit connections and illicit discharges elimination program.

The Permit allows for the customization of these MCMs if proposed customizations perform at or beyond the level of effectiveness of the original requirements. At this time, the SMB JG7 WMP Group is not considering customizing MCMs.

It should be noted, however, that institutional BMPs such as street and median sweeping, storm drain inlet and conveyance system cleaning, pet waste program enhancements, etc. are assumed to result in a cumulative pollutant load reduction of up to or approximately 5%. Additionally, assuming past data also reflect future trends, it is anticipated that 0.1 – 0.2% of residential, commercial, and industrial parcels will implement low impact development (LID) annually through development or redevelopment projects¹.

¹ 0.1-0.2% annual estimate is based on the area-weighted projected development/redevelopment rate for residential, commercial, and industrial land uses reported by the City of Los Angeles in the Ballona Creek TMDL Implementation Plan.

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Although RWLs are currently being met, it is anticipated that implementation of LID will further enhance the water quality in this region.

ADAPTIVE MANAGEMENT PROCESS

The WMP will be implemented as an adaptive program. As new program elements are implemented and information is gathered over time, the WMP will undergo modifications to reflect the most current understanding of the watershed and present a sound approach to addressing changing conditions. As such, the WMP will employ an adaptive management process that will allow the WMP to evolve over time. The steps involved in the adaptive management process are as follows:

1. Re-characterization of water quality priorities;
2. Source assessment re-evaluation;
3. Effectiveness assessment of watershed control measures; and
4. Updated Reasonable Assurance Analysis (RAA).

The adaptive management process provides a framework for the WMP to be a dynamic tool that remains relevant going forward. This process is repeated every two years following the final approval of the WMP.

SCHEDULE

The Notice of Intent submitted to the Regional Board in December 2013 provided a schedule of interim milestones for the development of the WMP and CIMP. At this time, the SMB JG7 WMP Group does not anticipate any deviations from the schedule. Completed milestones and projected completion dates for future milestones are presented in **Table ES-2**.

The compliance deadlines in the Santa Monica Bay Beaches Bacteria TMDL are currently in effect for SMB 7-6, SMB 7-8, and SMB 7-9. The TMDL for PCBs and DDTs does not include a compliance schedule for the WLAs for the SMB WMA, but because the WLAs were set based on the existing loads, the SMB WMA is considered to be in compliance. Therefore, a compliance schedule for the PCBs and DDTs TMDL is not being proposed at this time. The catch basin retrofit schedule for compliance with the Debris TMDL has been included in **Table ES-2**.

Table ES-2
WMP Schedule of Interim and Final Milestones

Deliverable	Planned Date of Completion
Submit Revised Final Draft WMP to the Regional Board	January 2015
Submit Final Draft CIMP to the Regional Board	June 2014
Submit Revised Final CIMP to the Regional Board	April 2015
57 catch basin opening cover and/or insert retrofits (cumulative) (26% of load reduced)	December 2015
161 catch basin opening cover and/or insert retrofits (cumulative) (100% of load reduced)	July 2016

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Attachment A: Santa Monica Bay Shoreline Monitoring Data within SMB JG7 WMP Group Area

Attachment B: Documentation of Authority

List of Acronyms

Acronym	Definition
AED	Allowable Exceedance Day
ASBS	Areas of Special Biological Significance
Basin Plan	Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties
BIOL	Preservation of Biological Habitats of Special Significance Beneficial Use Designation
BMP	Best Management Practice
Caltrans	California Department of Transportation
CASQA	California Stormwater Quality Association
CEDEN	California Environmental Data Exchange Network
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIMP	Coordinated Integrated Monitoring Program
City	City of Los Angeles
COMM	Commercial and Sport Fishing Beneficial Use Designation
CSMP	Coordinated Shoreline Monitoring Plan
CWA	Clean Water Act
DDT	Dichlorodiphenyltrichloroethane
ED	Exceedance Day
EMC	Event Mean Concentration
ES	Executive Summary
ESA	Environmentally Sensitive Area
ESCP	Erosion and Sediment Control Plan
EWMP	Enhanced Watershed Management Program
FC	Fecal Coliform
FIB	Fecal Indicator Bacteria
g/yr	Grams per Year

List of Acronyms

Acronym	Definition
GM	Geometric Mean
IC/ID	Illicit Connections and Illicit Discharges
IND	Industrial Service Supply Beneficial Use Designation
JG	Jurisdictional Group
JG7	Jurisdictional Group 7 of the City of Los Angeles
L-SWPPP	Local Storm Water Pollution Prevention Plan
LACFCD	Los Angeles County Flood Control District
LFD	Low-Flow Diversion
LID	Low Impact Development
MAR	Marine Habitat Beneficial Use Designation
MCM	Minimum Control Measure
mg/l	Milligrams per Liter
MIGR	Migration of Aquatic Organisms Beneficial Use Designation
MPN/mL	Most Probable Number of Organisms per Milliliter
MRP	Monitoring and Reporting Program
MS4	Municipal Separate Storm Sewer System
NA	Not Applicable
NAICS	North American Industry Classification System
NAV	Navigation Beneficial Use Designation
ND	Non-Detects
NPDES	National Pollutant Discharge Elimination System
PCB	Polychlorinated Biphenyl
Permit	Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175
PIPP	Public Information and Participation Program
PMRP	Plastic Pellet Monitoring and Reporting Program
POTW	Publically-Owned Treatment Works
QA/QC	Quality Assurance/Quality Control
RAA	Reasonable Assurance Analysis
RARE	Rare, Threatened, or Endangered Species Beneficial Use Designation

List of Acronyms

Acronym	Definition
Regional Board	Los Angeles Regional Water Quality Control Board
RWL	Receiving Water Limitation
SCCWRP	Southern California Coastal Water Research Project
SHELL	Shellfish Harvesting Beneficial Use Designation
SIC	Standard Industrial Classification
SMB	Santa Monica Bay
SMBB	Santa Monica Bay Beaches
SMB JG7 WMP Group	Santa Monica Bay Jurisdictional Group 7 Watershed Management Program Group
SMB WMA	Santa Monica Bay Watershed Management Area
SPWN	Spawning, Reproduction, and/or Early Development Beneficial Use Designation
SQMP	Stormwater Quality Management Plan
SUSMP	Standard Urban Stormwater Mitigation Plan
SWAMP	Surface Water Ambient Monitoring Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Technical Advisory Committee
TMDL	Total Maximum Daily Load
TMRP	Trash Monitoring and Reporting Plan
USEPA	United States Environmental Protection Agency
WBPC	Water Body-Pollutant Combination
WDID	Waste Discharger Identification
WILD	Wildlife Habitat Beneficial Use Designation
WMA	Watershed Management Area
WMP	Watershed Management Program
WQBEL	Water Quality-Based Effluent Limitation

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1.1 Background and Regulatory Framework

The National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit No. R4-2012-0175 (Permit) was adopted November 8, 2012 by the Los Angeles Regional Water Quality Control Board (Regional Board) and became effective December 28, 2012. The purpose of the Permit is to ensure the MS4s in Los Angeles County are not causing or contributing to exceedances of water quality objectives set to protect the beneficial uses in the receiving waters in the Los Angeles region.

The Permit allows Permittees to customize their stormwater programs through the development and implementation of a Watershed Management Program (WMP) or an Enhanced Watershed Management Program (EWMP) to achieve compliance with receiving water limitations (RWLs) and water quality-based effluent limits (WQBELs). The City of Los Angeles (City) has been a participating agency of Jurisdictional Group 7 (JG7) of the Santa Monica Bay Watershed since the adoption of the Santa Monica Bay Beaches Bacteria Total Maximum Daily Loads (TMDLs) in 2003. However, the City of Los Angeles and the other MS4 permittees in JG7 could not reach an agreement for a collaborative approach to satisfying the requirements of the MS4 permit. Therefore, on November 26, 2013 the Regional Board requested that the City and the Los Angeles County Flood Control District (LACFCD), collectively referred to as the Santa Monica Bay JG7 WMP Group (SMB JG7 WMP Group), pursue a WMP instead of an EWMP. The primary reasons for this request included: 1) MS4 discharges to Santa Monica Bay are anticipated to be minimal due to the small contributing drainage areas; and 2) opportunities for structural best management practice (BMP) implementation are limited due to the geography of the WMP area (e.g., cliffs at outfalls, landslide and liquefaction hazards, etc.). In December of 2013, the SMB JG7 WMP Group submitted a revised Notice of Intent to develop a WMP for the City of Los Angeles land area within the JG7 area to fulfill the requirements of the Permit.

This WMP, in combination with the JG7 Coordinate Integrated Monitoring Program (CIMP), was prepared to satisfy Part C.1.f of the Permit, which includes the following tasks:

1. Prioritize water quality issues resulting from stormwater and non-stormwater discharges from the MS4 to receiving waters within each Watershed Management Area (WMA);
2. Identify and implement strategies, control measures, and BMPs to achieve the outcomes specified in Part VI.C.1.d;
3. Execute an integrated monitoring program and assessment program pursuant to Attachment E – MRP, Part VI to determine progress towards achieving applicable limitations and/or action levels in Attachment G;
4. Modify strategies, control measures, and BMPs as necessary based on analysis of monitoring data collected pursuant to the monitoring and reporting program (MRP) to ensure that applicable WQBELs, RWLs and other milestones set forth in the WMP are achieved in the required timeframes; and
5. Provide appropriate opportunity for meaningful stakeholder input, including but not limited to, a permit-wide watershed management program technical advisory committee (TAC) that will advise and participate in the development of the WMPs and EWMPs from month 6 through the date of program approval.

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1.2 SMB JG7 WMP Group Geographical Area

The SMB JG7 WMP Group area is located within the southern portion of the Santa Monica Bay WMA, which encompasses an area of approximately 414 square miles and includes the Santa Monica Bay and land area that drains into the Bay. The boundary of the Santa Monica Bay, as defined for the National Estuary Program, extends from the Los Angeles/Ventura County line to the northwest, southeast toward Point Fermin located on the Palos Verdes Peninsula. The land area that drains into the Bay follows the crest of the Santa Monica Mountains on the north to Griffith Park; then extends south and west across the Los Angeles coastal plain to include the area east of Ballona Creek and north of the Baldwin Hills. South of Ballona Creek, the natural drainage is a narrow coastal strip between Playa del Rey and Palos Verdes (Regional Board, 2011). **Figure 1-1** depicts the location of the SMB JG7 WMP Group within the Santa Monica Bay Watershed.

The full JG7 area includes the Cities of Rancho Palos Verdes, Palos Verdes Estate, Rolling Hills, Rolling Hills Estate, and the City of Los Angeles. This SMB JG7 WMP only addresses the area owned by the City and LACFCD within JG7, which includes the following water bodies as listed in the Basin Plan:

- Los Angeles County Coastal Nearshore Zone
- Royal Palms Beach
- Whites Point County Beach
- Point Fermin Park Beach (not listed in Basin Plan)

The SMB JG7 WMP area, which consists of land owned by the City and includes any LACFCD infrastructure, totals approximately 1,056 acres, which is approximately 9% of the entire JG7 area within the Santa Monica Bay Watershed. **Figure 1-1** illustrates the extent of the SMB JG7 WMP Group Area. The geographical scope of the SMB JG7 WMP Group area excludes areas of land totaling approximately 47 acres for which the MS4 permittees do not have jurisdiction, including land owned by the Los Angeles Air Force Base Pacific Crest Housing Area. With the exclusion of these areas, the SMB JG7 WMP area covers 1,009 acres. The majority of the land uses within the WMP area consist of residential (approximately 67%) and vacant/open space (approximately 27%), with the remaining area consisting of a mixture of commercial, educational, and industrial land uses (**Table 1-1**). There are no designated transportation or agricultural land uses in the WMP area. The open space area includes 102 acres of restored coastal sage scrub habitat and hiking trails located within the White Point Nature Preserve.

Table 1-1
SMB JG7 WMP Land Use Summary

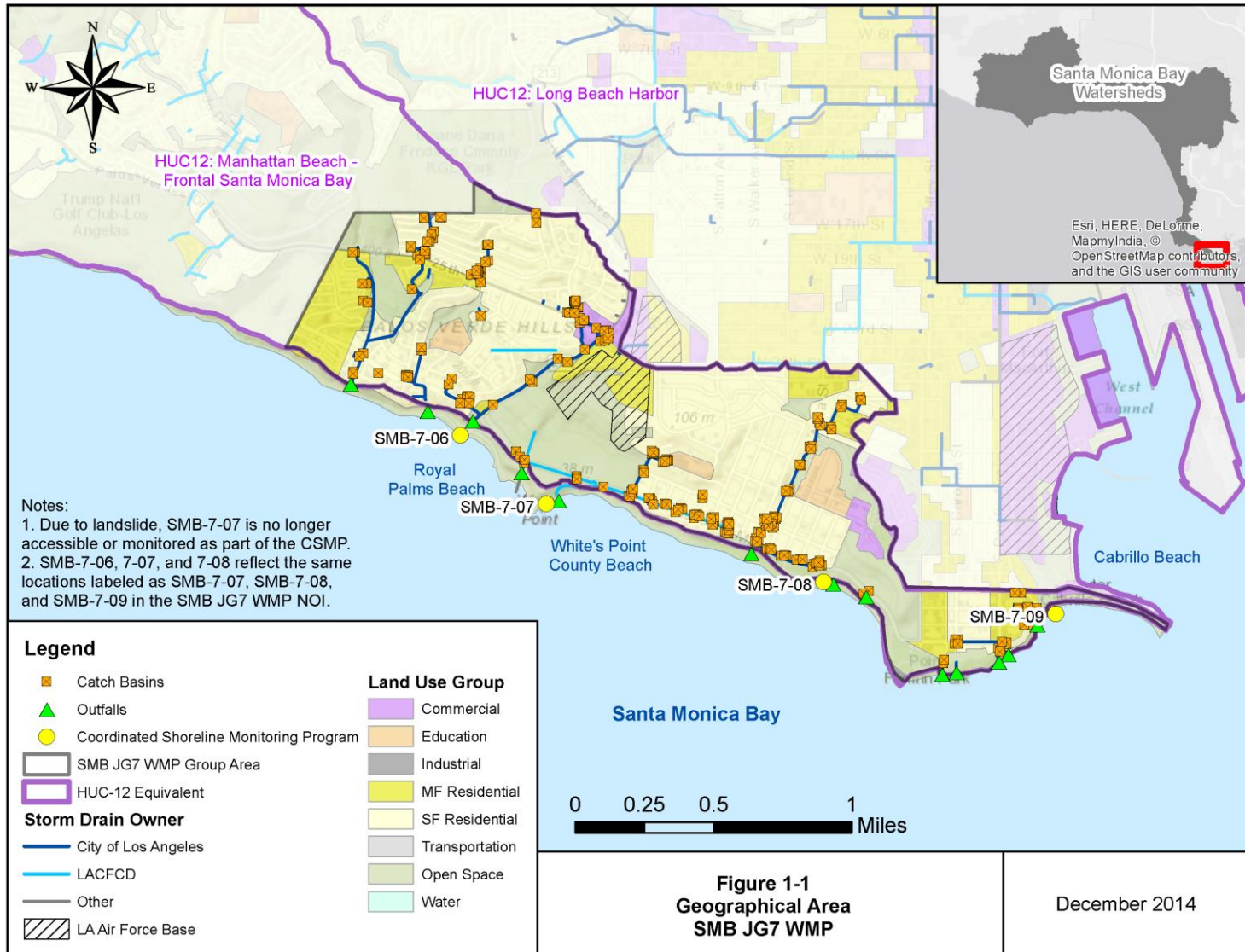
Land Use	% of Total
Commercial	2%
Industrial	0.1%
Education	3%
Multi-Family Residential	14%
Single Family Residential	53%
Open Space	27%
Total	100%

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The City of Los Angeles JG7 WMP area includes 218 catch basins and 13 storm drain outfalls owned and operated by either the City of Los Angeles or the LACFCD. The majority of the storm drain outfalls in the SMB JG7 WMP area are circular pipes extending from the cliff side, around one hundred feet above the rocky shoreline. The majority of the outfalls themselves are inaccessible at the pipe outlet.

The coastline along, and several inland sites within, the SMB JG7 WMP area is characterized as being subject to landslide and liquefaction hazards (City of Los Angeles Bureau of Engineering, 2014). This characterization was exemplified by the destruction of the SMB 7-7 TMDL shoreline monitoring site due to landslide in 2011.

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1.3 Watershed Management Program Development Process

The WMP for the SMB JG7 WMP Group includes four major components, as follows:

1. **Water Quality Priorities:** The identification of water quality priorities is an important first step in the WMP process. Water quality priorities, described in Section 2, are defined for individual constituents within a specific water body, termed as Water Body-Pollutant Combinations (WBPCs). Categories of the WBPCs are defined in the Permit. Priorities are assigned to the WBPCs based on the categorization. The water quality priorities will provide the basis for prioritizing implementation activities within the WMP.
2. **Watershed Control Measures/Minimum Control Measures:** Development of the WMP requires identification of control measures/BMPs, as described in Section 3, expected to be sufficient to meet receiving water and effluent limitations set forth in the MS4 Permit (Regional Board, 2012). BMPs vary in function and type, with each BMP providing unique design characteristics and benefits from implementation. The overarching goal of BMPs in the WMP is to reduce the impact of stormwater and non-stormwater runoff on receiving water quality.
3. **Reasonable Assurance Analysis:** A key element of each WMP is the reasonable assurance analysis (RAA), described in Section 4, which is used to demonstrate “...that the activities and control measures...will achieve applicable WQBELs and/or RWLs with compliance deadlines during the Permit term” (Section C.5.b.iv.(5), page 63). The Permit prescribes the RAA as a quantitative demonstration that control measures, specifically BMPs, will be effective. In other words, the RAA not only demonstrates the cumulative effectiveness of BMPs to be implemented, but it also supports their selection. However, due to current zero target load reductions and alternative compliance measures for the identified WBPCs, a quantitative analysis is not necessary at this time. Therefore, the SMB JG7 WMP group has decided to present a qualitative RAA discussion, acknowledging that a quantitative RAA may become necessary in the future based on results of future CIMP monitoring.
4. **Adaptive Management Process:** The WMP is intended to be implemented as an adaptive program as described in Section 5. As new program elements are implemented and information is gathered over time, the WMP will undergo modifications to reflect the most current understanding of the watershed and present a sound approach to addressing changing conditions. As such, the WMP will employ an adaptive management process that will allow the WMP to evolve over time.

1.4 Watershed Management Program Overview

This WMP has been prepared to outline the steps that will be taken by the SMB JG7 WMP Group in compliance with the requirements and deadlines set forth within the MS4 Permit. This document is organized into the following sections:

- **Section 1** – Introduction
- **Section 2** – Identification of Water Quality Priorities
- **Section 3** – Watershed Control Measures
- **Section 4** – Reasonable Assurance Analysis Approach
- **Section 5** – Adaptive Management Process
- **Section 6** – References

2

Identification of Water Quality Priorities

To develop the WMP, the Permit requires that SMB JG7 WMP Group establish water quality priorities within each WMA. In accordance with the Permit Section IV.C.5(a), this section characterizes the water quality conditions within the SMB JG7 WMP area, identifies water quality priorities, determines water body-pollutant classifications, and assesses pollutant sources. The water quality priorities identified in this section provide the basis for prioritizing project implementation; selecting and scheduling BMPs (if needed); and focusing monitoring activities developed in the CIMP.

2.1 Water Quality Characterization

Figure 2-1 identifies the receiving waters in the SMB JG7 WMP Group area, as depicted in the Water Quality Control Plan, Los Angeles Region (Basin Plan) (Regional Board, 1995, Updated 2011). **Table 2-1** summarizes the beneficial uses for each of these water bodies, as designated in the Basin Plan. As beneficial uses designated as “potential” have not yet been established, these uses will not be evaluated further in the WMP. The SMB JG7 WMP Group area includes the water bodies listed below.

- Los Angeles County Coastal Nearshore Zone
- Royal Palms Beach
- Whites Point County Beach
- Point Fermin Park Beach (not listed in Basin Plan)

Beneficial use designations for these water bodies include the following:

- **Water Contract Recreation (REC-1):** Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.
- **Non-Contact Water Recreation (REC-2):** Uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- **Industrial Services Supply (IND):** Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.
- **Navigation (NAV):** Uses of water for shipping, travel, or other transportation by private, military, or commercial vessels.
- **Commercial and Sport Fishing (COMM):** Uses of water for commercial or recreational collection of fish, shellfish, or other organisms intended for human consumption or bait purposes.
- **Marine Habitat (MAR):** Uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).

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- **Preservation of Biological Habitats (BIOL):** Uses of water that support designated areas of habitats, such as Areas of Special Biological Significance (ASBS), established refuges, parks, sanctuaries, ecological reserves, or other areas where the preservation or enhancement of natural resources requires special protection.
- **Migration of Aquatic Organisms (MIGR):** Uses of water that support habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.
- **Spawning, Reproduction, and/or Early Development (SPWN):** Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish.
- **Shellfish Harvesting (SHELL):** Uses of water that support habitats suitable for the collection of filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sports purposes.
- **Wildlife Habitat (WILD):** Uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
- **Rare, Threatened, or Endangered Species (RARE):** Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.

**Table 2-1
Beneficial Uses of Water Bodies and Coastal Features Designated in the Basin Plan**

Water Body (and Tributaries)	Beneficial Uses											
	REC-1	REC-2	WILD	RARE	IND	NAV	COMM	MAR	BIOL	MIGR	SPWN	SHELL
Los Angeles County Coastal Nearshore Zone [^]	E	E	E	Ee	E	E	E	E	Ean	Ef	Ef	E
Royal Palms Beach	E	E	E			E	E	E			P	E
Whites Point County Beach	E	E	E			E	E	E			P	E
Point Fermin Park Beach	Not listed in Basin Plan											

E = Existing beneficial use

P = Potential beneficial use

e = One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.

f = Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas that are heavily influenced by freshwater inputs.

an = Point Fermin Marine Life Refuge

[^] = Nearshore is defined as the zone bounded by the shoreline and a line 1,000 feet from the shoreline or the 30-foot depth contours, whichever is further from the shoreline. Longshore extent is from Rincon Creek to the San Gabriel River Estuary.

2.1.1 Water Quality Objectives/Criteria

The Clean Water Act (CWA) requires that the State Water Resources Control Board (SWRCB) and Regional Boards conduct a water quality assessment that addresses the condition of its surface waters [required in Section 305(b) of the CWA] and provides a list of impaired waters [required in CWA Section 303(d)] that is then submitted to the U.S. Environmental Protection Agency (USEPA) for review and approval. The 2010 Integrated Report and updated 303(d) list were approved by the SWRCB on August 4, 2010 and by the USEPA on October 11, 2011. The 2010 303(d)-listed water bodies and associated

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pollutants within the SMB JG7 WMP Group area are summarized in **Error! Reference source not found.**

Table 2-2
2010 303(d)-Listed Water Bodies in the SMB JG7 WMP Group Area

Water Body	Pollutant Class	Pollutant	Notes
Santa Monica Bay Beaches	Pathogens	Coliform Bacteria	Addressed by Bacteria TMDL
	Pesticides	DDT	Addressed by PCB/DDT TMDL
	Other Organics	PCBs	Addressed by PCB/DDT TMDL
Santa Monica Bay (Los Angeles County Coastal Nearshore Zone)	Trash	Debris Plastic Pellets	Addressed by Debris TMDL
	Pesticides	DDT (tissue & sediment)	Addressed by PCB/DDT TMDL
	Other Organics	PCBs (tissue & sediment)	Addressed by PCB/DDT TMDL
	Toxicity	Sediment Toxicity	Addressed by PCB/DDT TMDL
	Miscellaneous	Fish Consumption Advisory	Addressed by PCB/DDT TMDL

Water bodies are subject to water quality objectives in the Basin Plan, or Basin Plan Amendments, such as those to implement TMDLs. There are currently three TMDLs in effect for the water bodies within the SMB JG7 WMP Group area as listed in Attachment M of the Permit. These TMDLs are summarized in **Table 2-3**.

Table 2-3
Santa Monica Bay TMDLs

TMDL Name	Agency	Effective Date
SMB Beaches Bacteria TMDL, Reconsideration of Certain Technical Matters of the SMB Beaches Bacteria TMDL, Resolution R12-007	Regional Board	Effective July 2, 2014
SMB TMDL for DDT and PCBs	USEPA	March 26, 2012
SMB Nearshore Debris TMDL, Resolution R10-010	Regional Board	March 20, 2012
SMB Beaches Bacteria TMDL, Dry Weather, Resolution 2002-004 ^a	Regional Board	July 15, 2003
SMB Beaches Bacteria TMDL, Wet Weather, Resolution 2002-022 ^a	Regional Board	July 15, 2003

^a This TMDL was revised pursuant to Resolution R12-2007.

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Table 2-4 identifies the applicable WQBELs and/or RWLs established pursuant to TMDLs included in Attachment M of the Permit. The water quality objectives as listed in the Basin Plan are also applicable to water bodies based on the designated beneficial uses. The Debris TMDL final WQBELs are effective March 20, 2020. The effective date of the polychlorinated biphenyl (PCB) and dichlorodiphenyltrichloroethane (DDT) final WQBELs will be specified later in this document, since the USEPA-developed TMDL lacks a compliance schedule. The Bacteria TMDL final WQBELs and RWLs are currently effective for both dry weather and wet weather².

**Table 2-4
Final Permit RWLs and WQBELs for SMB TMDLs**

Reference	Parameter	Effluent Limitation/ Receiving Water Limitation
SMB Nearshore Debris TMDL	Trash – WQBEL	Zero
	Plastic Pellets – WQBEL	Zero
TMDL for PCBs/DDTs (for LA County MS4)	DDT – WLA	27.08 g/yr (based on 3-year averaging period) ²
	PCBs – WLA	140.25 g/yr (based on 3-year averaging period) ²
SMB Beaches Bacteria TMDL	Total coliform (daily maximum) – WQBEL	10,000 Most Probable Number (MPN)/100 mL
	Total coliform (daily maximum), if the ratio of fecal- to-total coliform exceeds 0.1 – WQBEL	1,000 MPN/100 mL
	Fecal coliform (daily maximum) – WQBEL	400 MPN/100 mL
	Enterococcus (daily maximum) – WQBEL	104 MPN/100 mL
	Total coliform (geometric mean ¹) – WQBEL/RWL	1,000 MPN/100 mL
	Fecal coliform (geometric mean ¹) – WQBEL/RWL	200 MPN/100 mL
	Enterococcus (geometric mean ¹) – WQBEL/RWL	35 MPN/100 mL

¹The rolling 30-day geometric mean is calculated based on the previous 30 days. The reopened 2012 TMDL, which has been approved by USEPA, modified this to weekly calculation of a rolling six-week geometric mean using five or more samples, starting all calculation weeks on Sunday.

²Group load-based WQBELs that apply to all SMB MS4 dischargers; the individual load-based WQBELs for SMB JG7 WMP Group members would be an area-weighted fraction of this.
MPN/ml = most probable number of organisms per milliliter

Grouped RWLs for the Santa Monica Bay Beaches Bacteria TMDL are also expressed in the Permit in terms of allowable exceedance days (AEDs), which vary by season and by Coordinated Shoreline Monitoring Plan (CSMP) monitoring station. AEDs applicable to SMB 7-6, 7-7, 7-8 and 7-9 are summarized and discussed in **Table 2-6**, presented in the following Section 2.1.4.

² Per Resolution 2006-008, the J7 agencies elected to pursue a non-integrated water resources approach to SMB Beaches Bacteria TMDL compliance, which results in a final wet weather compliance deadline of at most 10 years, or July 15, 2013. http://63.199.216.6/larwqcb_new/bpa/docs/2006-008/2006-008_RB_RSL.pdf

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2.1.2 QA/QC Criteria

Quality assurance/quality control (QA/QC) criteria have been established to verify that data referenced in this water body characterization are qualified for use. All data used have either been peer reviewed; were submitted as part of an official record, such as in an agency's Annual Report to the Regional Board; or have met QA/QC criteria established by another party, such as the County, City Environmental Health Division, Regional Board, or California Environmental Data Exchange Network (CEDEN), which includes the Bight Program. Data not meeting these criteria have not been used in this water body characterization.

2.1.3 Detailed Data Analysis

A detailed monitoring data analysis was conducted to:

1. Evaluate the status of TMDL compliance;
2. Evaluate the status of 303(d) listings (i.e., whether any WBPCs meet the SWRCB's 303[d] delisting criteria);
3. Identify other WBPCs that meet 303(d) listing criteria; and
4. Identify remaining WBPCs demonstrating exceedance(s) of applicable receiving water limitations.

Monitoring data analyzed are summarized in **Table 2-5**, and existing monitoring stations are shown in **Figure 2-1**. It should be noted that the data presented are receiving water quality data and do not imply MS4 contributions.

Table 2-5
Existing Monitoring Programs

Program Name	Monitoring Period	Monitoring Locations	Parameters Analyzed	Frequency
Coordinated Shoreline Monitoring Program	2004-2013	Santa Monica Bay Beaches	Bacteria	Weekly
Southern California Bight Regional Monitoring	1994 - 2013	Santa Monica Bay Offshore/Nearshore	General suite in 1995 and 1998; General suite in sediment only in 2003 and 2008	Varies by site

2.1.4 TMDL Compliance Status

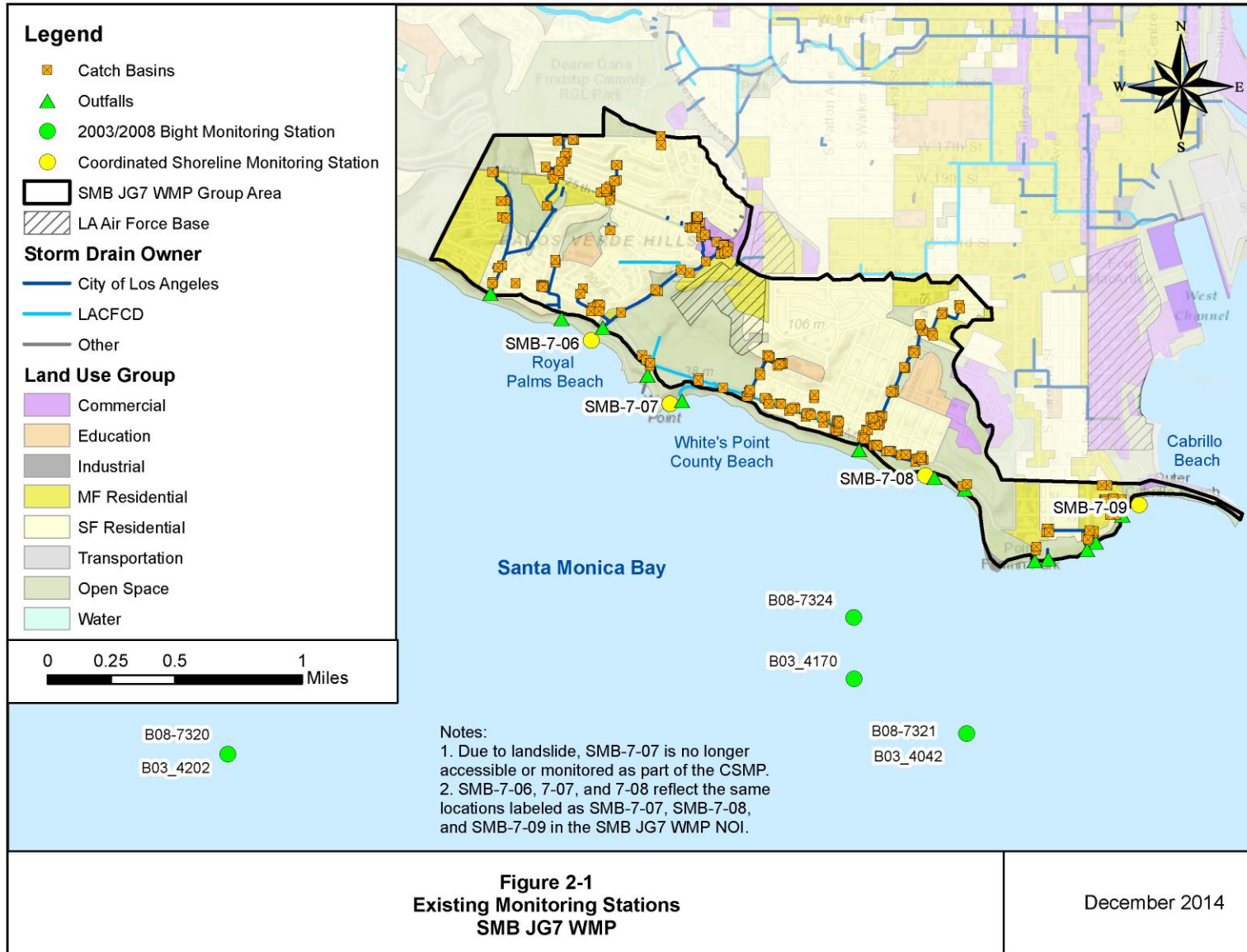
Error! Reference source not found. summarizes the shoreline monitoring bacteria data from 2003 through 2013 with respect to the number of exceedance days (EDs) at SMB-7-06, SMB-7-07, SMP-7-08 and SMB-7-09, as defined in the TMDL (exceeding one of four single sample daily maximum REC-1 WQOs). Three sites are open beach locations, and as such, any exceedance is not necessarily directly attributable to the MS4. Access to SMB-7-07 was destroyed in a landslide in 2011 and has not been accessible or monitored since 2011. Geometric mean exceedance days are also reported here. A summary of the average, median, minimum, and maximum water quality results from single-sample monitoring at SMB 7-06, SMB-7-07, SMB-7-08, and SMB 7-09 is included in Attachment A. If follow-up samples were collected for weekly sites then those were included in this analysis, which may increase the number of reported EDs. As shown in **Error! Reference source not found.**, the summer dry weather AEDs were exceeded eight out of the eleven years monitored (73%) at SMB 7-6, four out of the seven years monitored (57%) at SMB 7-7, three out of the eleven years monitored (27%) at SMB-7-8, and four out of the nine years monitored (44%) at SMB 7-9. The winter dry weather AEDs were exceeded six out of the eleven years monitored (55%) at SMB 7-6, two out of the seven years monitored (30%) at SMB 7-7, one

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out of the eleven years monitored (9%) at SMB-7-8, and two out of the nine years monitored (22%) at SMB 7-9. The wet weather AEDs were exceeded four out of the eleven years monitored (36%) at SMB 7-6, five out of the seven years monitored (71%) at SMB 7-7, two out of the eleven years monitored (18%) at SMB-7-8, and four out of the nine years monitored (44%) at SMB 7-9. With respect to geomeans, the zero AEDs were exceeded nine out of the eleven years monitored (82%) at SMB 7-6, two out of the seven years monitored (29%) at SMB 7-7, two out of the eleven years monitored (18%) at SMB-7-8, and three out of the nine years monitored (33%) at SMB 7-9. It should be noted that 2005 recorded the most annual rainfall in Los Angeles County history (34 inches), which likely contributed to the abnormal number of exceedances. Additionally, 7-9 was monitored daily, rather than weekly, in 2005, and total coliform at SMB 7-6 was monitored daily between 2003 and 2006.

USEPA's Santa Monica Bay DDTs and PCBs TMDL (USEPA, 2012) relies on a limited dataset to establish stormwater load allocations, relying on a single study (Curren *et al*, 2011) from a single creek (Ballona Creek, which is outside the SMB JG7 WMP area) to extrapolate MS4 wasteload allocations to other SMB watersheds based on percent urban area. The Santa Monica Canyon, Ballona Creek, and Hermosa Beach watersheds combined represent 94% of the developed area draining to Santa Monica Bay. The TMDL does not present sufficient data to differentiate or disaggregate MS4 contributions by subwatershed to the DDT and PCB concentrations observed in Santa Monica Bay.

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Table 2-6
Summary of Exceedance Days
 (bold text signifies Exceedance Days > Allowable Exceedance Days)

Station (type)	Season	AEDs	Number of Exceedance Days per TMDL Year										
			2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
SMB-7-6 (open beach)	Dry-Summer ^a	0	1	1	1	2	0	2	0	1	0	1	1
	Dry-Winter ^b	1	3	1	11	1	2	0	5	1	2	2	0
	Wet ^c	1 ^d	1	1	28	1	0	2	1	3	2	1	0
	Geomean ^e	0	4	2	10	0	1	1	7	5	3	8	0
SMB-7-7	Dry-Summer ^a	0	-	1	0	1	4	0	2	0	No data – site destroyed by landslide		
	Dry-Winter ^b	1	-	0	0	0	4	1	1	3			
	Wet ^c	1	-	1	12	6	2	5	9	0			
	Geomean ^e	0	-	0	0	0	0	2	1	0			
SMB-7-8 (open beach)	Dry-Summer ^a	0	1	1	0	0	0	0	0	0	0	3	0
	Dry-Winter ^b	1	0	0	2	0	0	0	1	0	1	0	0
	Wet ^c	1 ^d	0	0	13	0	0	0	1	0	2	1	0
	Geomean ^e	0	0	0	3	0	0	0	1	0	0	0	0
SMB-7-9 (open beach)	Dry-Summer ^a	0	-	-	0	1	3	1	0	0	1	0	0
	Dry-Winter ^b	1	-	-	0	2	0	0	1	1	2	0	0
	Wet ^c	1	-	-	15	0	0	5	1	3	7	0	0
	Geomean ^e	0	-	-	1	0	0	3	0	0	2	0	0

^a Summer Dry Weather = April 1 – October 31

^b Winter Dry Weather = November 1 – March 31

^c Wet Weather = November 1 – October 31, days with ≥ 0.1 inches of rain and the three days following

^d 2012-2013 dataset is incomplete and ends on 9/18/2013.

^e AEDs are based on weekly sampling. Exceedance days were calculated based on the raw data. For example, in cases where more than one sample was collected in a single week, those results were still compared against the weekly AEDs. This approach is consistent with annual monitoring reports, but overestimates actual exceedance weeks.

^e Geometric means (geomeans) were calculated using the direction in Resolution No. 12-007, calculated weekly as a rolling geometric mean using 5 or more samples, for 6 week periods starting all calculation weeks on Sunday.

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2.1.5 Other Water Body-Pollutant Combinations that meet 303(d) Listing Criteria

The offshore Bight sediment data in this area are not considered to be representative of the MS4 discharges, due to distance from the outfalls and given the sample proximities to the Palos Verdes Shelf Superfund site. However, if a comparison were to be made to the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List, which requires a minimum sample size of 16 for toxicants and 26 for conventional or other pollutants for new listings, the Bight data for each of the monitoring stations depicted in Figure 2-1 do not include a qualifying number of samples (sample size at each location is between 3 and ten for all parameters.)

Therefore, there were no WBPCs identified within the SMB JG7 WMP geographical scope that were found to meet the 303(d) listing criteria.

2.1.6 Remaining Water Body-Pollutant Combinations Demonstrating Exceedance(s) of Applicable Receiving Water Limitations

In addition to PCBs and DDTs, the Bight data also analyzed the following parameter suites: metals, nutrients, PAHs, and organochlorine pesticides. However, due to the distance from the MS4 outfall and proximity to the Palos Verdes Shelf Superfund site which is dominated by historic discharges from the LA County Sanitary Sewer System (LACSD) outfall, this data cannot be used to draw conclusions about impact of MS4 discharges on the Santa Monica Bay.

2.2 Water Body-Pollutant Prioritization

Based on the water quality characterization, the WBPCs identified in **Table 2-7** have been classified into one of three categories, in accordance with Section VI.C.5(a)ii of the Permit. This categorization is intended to prioritize WBPCs in order to guide the implementation of structural and institutional BMPs.

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Table 2-7
Water Body Pollutant Prioritization
 (Listed in order of compliance deadline, interim and final are included.
 Passed deadlines are shown in bold font)

Category	Water Body	Pollutant	Compliance Deadline
1	SMB Beaches	Summer dry weather bacteria	7/15/2006 for single sample AEDs
		Winter dry weather bacteria	7/15/2009 for single sample AEDs
		Wet weather bacteria	7/15/2013 for single sample AEDs¹
	7/15/2013 for geometric mean (GM)¹		
	SMB Offshore/ Nearshore	Debris	3/20/2016 (20% load reduction)
			3/20/2017 (40% load reduction)
			3/20/2018 (60% load reduction)
			3/20/2019 (80% load reduction)
			3/20/2020 (100% load reduction)
SMB	DDTs	[No compliance deadline specified in TMDL] ^{2,3}	
	PCBs	[No compliance deadline specified in TMDL] ^{2,3}	
2	No Category 2 WBPCs have been identified at this time		
3	No Category 3 WBPCs have been identified at this time		

¹ Per Resolution 2006-008, the J7 agencies elected to pursue a non-integrated water resources approach to SMB Beaches Bacteria TMDL compliance, which results in a final wet weather compliance deadline of at most 10-years, or July 15, 2013. http://63.199.216.6/larwqcb_new/bpa/docs/2006-008/2006-008_RB_RSL.pdf

² Although the TMDL lacks a formal compliance schedule for the WLAs, Table 6-5 of the TMDL does specify a timeline for the DDT/PCB targets in water and sediment. Additionally, the WLA target was set at existing waste load, so antidegradation conditions exist.

³ Contamination of DDT and PCBs in the sediments of the Santa Monica Bay has led to a 303(d) listing of Fish Consumption Advisory. The Santa Monica Bay TMDL for DDTs and PCBs issued in 2012 addresses the impairment to human health consumption due to DDT and PCBs in the Santa Monica Bay from Point Dume to Point Vicente and the Palos Verde Shelf from Point Vicente to Point Fermin.

As part of the adaptive management process, categorization of future WBPCs may be adjusted based on data obtained from monitoring, source evaluations, and BMP implementation. Data collected as part of the approved CIMP may result in future Category 3 designations in instances when receiving water limits are exceeded and MS4 discharges are identified as contributing to such exceedances. Under these conditions, the appropriate agencies will adhere to Section VI.C.2.a.iii of the Permit.

2.2.1 Category 1 – Highest Priority

WBPCs under Category 1 (highest priority) are defined in the Permit as “*water body-pollutant combinations for which water quality-based effluent limitations and/or receiving water limitations are established in Part VI.E and Attachments L through R [of the Permit].*”

The WBPC of bacteria (wet and dry weather) at the Santa Monica Bay Beaches within the SMB JG7 WMP area (including Royal Palms Beach, White Point Beach, and Point Fermin Park Beach) fall within Category 1 because they are listed in the Santa Monica Bay Beaches Bacteria TMDL. The Implementation Plan for compliance with the Wet Weather Santa Monica Bay Beaches Bacteria TMDL for the larger JG7 documents historical monitoring at eight sampling locations between 1997 and 2000 for indicator bacteria. Based on the historical monitoring having fewer exceedances than the reference beach,

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the Implementation Plan concluded that “as JG7 already meets the baseline goals and only needs to implement provisions to prevent “backsliding”; the non-integrated approach will be selected. No milestones are proposed, as existing conditions are the equivalent of compliance with the TMDL” (Regional Board, 2012). As a result, the Implementation Plan states that JG7 should continue to implement BMPs, review the LA County Sanitation Districts’ data, and perform investigations as necessary. Tables M-1 and M-2 of Attachment M to the MS4 Permit also show that the compliance monitoring locations within the SMB JG7 WMP geographical area, SMB 7-6, SMB 7-8, and SMB 7-9 are subject to antidegradation conditions because the beaches have fewer exceedance days than the reference beach. Therefore, there is a zero required load reduction for bacteria, and reasonable assurance is demonstrated.

A Debris TMDL exists for Santa Monica Bay. Section VI.E.5.b(i) of the Permit states, “Pursuant to California Water Code section 13360(a), Permittees may comply with the trash [debris] effluent limitations using any lawful means. Such compliance options are broadly classified as full capture, partial capture, institutional controls, or minimum frequency of assessment and collection... and any combination of these may be employed to achieve compliance.” While trash will not be modeled as part of the RAA, the RAA will address how the JG7 agencies will comply with the TMDL WQBELs by providing details on the planned implementation of the methods listed above, primarily through their Trash Monitoring and Reporting Program.

Although a USEPA TMDL exists for DDTs and PCBs for Santa Monica Bay, the TMDL relies on a limited dataset outside of the JG7 watershed area to establish stormwater load allocations. The TMDL mass-based waste load allocations for DDTs and PCBs are equivalent to the estimated existing stormwater loads (i.e., based on data used in the TMDL, zero MS4 load reduction is required). As a result, it is anticipated that for the WMP RAA, no reductions in DDT and PCB loading from the JG7 MS4s are required to meet the TMDL WQBELs. And while DDTs and PCBs cannot be modeled as a stormwater pollutant for the RAA (due to the lack of land use event mean concentrations and BMP performance data), it will be qualitatively evaluated. It is also noted that the implementation of future institutional and/or structural BMPs throughout the SMB JG7 WMP area will lead to a reduction in runoff volume and suspended sediment loading from the MS4s, thereby further reducing the existing mass load of any sediment-bound DDTs and/or PCBs to the Santa Monica Bay. For these reasons, while DDT and PCBs will be included as Category 1 pollutants, they will be prioritized lower than bacteria and debris within Category 1, and will continue to be evaluated further through the CIMP monitoring effort.

2.2.2 Category 2 – High Priority

Category 2 (high priority) WBPCs are defined as “pollutants for which data indicate water quality impairment in the receiving water according to the State’s Water Quality Control Policy for Developing California’s Clean Water Act Section 303(d) List (State Listing Policy) and for which MS4 discharges may be causing or contributing to the impairment.”

Sediment toxicity is not included as a Category 2 WBPC in Santa Monica Bay to be consistent with USEPA determinations (USEPA, 2012). This USEPA determination was based on lack of toxicity in regional surveys. The Santa Monica Bay PCB and DDT TMDL cites studies from 1986 to 2008, which report findings of low toxicity in the Santa Monica Bay. For example, in 2008 four samples in Santa Monica Bay showed no toxicity and one sample from the Palos Verdes Shelf near Point Fermin showed a low level of toxicity. This low level toxicity threshold used in the 2008 survey is more conservative than required for the listing policy.

Therefore, there are no WBPCs within the SMB JG7 WMP area that currently qualify as Category 2.

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2.2.3 Category 3 – Medium Priority

Category 3 (medium priority) designations are to be applied to WBPCs that are not 303(d)-listed but which exceed applicable receiving water limitations contained in the Permit and for which MS4 discharges may be causing or contributing to the exceedance.

There are no WBPCs within the SMB JG7 WMP area that currently qualify as Category 3 that are not already listed as Category 1.

2.3 Source Assessment

The following data sources have been reviewed as part of the source assessment for bacteria and DDT/PCBs in the Santa Monica Bay subwatersheds:

- Findings from the Permittees' Illicit Connections and Illicit Discharge (IC/ID) Elimination Programs;
- Findings from the Permittees' Industrial/Commercial Facilities Programs;
- Findings from the Permittees' Development Construction Programs;
- Findings from the Permittees' Public Agency Activities Programs;
- TMDL source investigations;
- Watershed model results;
- Findings from the Permittees' monitoring programs, including but not limited to TMDL compliance monitoring and receiving water monitoring; and
- Any other pertinent data, information, or studies related to pollutant sources and conditions that contribute to the highest water quality priorities.

Since the only receiving water in the SMB JG7 WMP area is the Santa Monica Bay, the following source assessment is broken down by pollutant.

2.3.1 Indicator Bacteria

Wet weather runoff event mean concentrations (EMCs) for fecal coliform, based on the Southern California Coastal Water Research Project (SCCWRP) land use data for the Los Angeles region (Stein *et al*, 2007), indicate that the highest concentrations are expected from agricultural land uses (there are none in the SMB JG7 WMP area), followed by commercial and educational, single family residential, multi-family residential, open space, industrial, and transportation. Commercial and educational land uses account for 2% and 3%, respectively, of all land uses in the J7 WMP area, with single family residential (53%), multi-family residential (14%), and open space (27%). Local activities likely account for the sources of bacteria.

The Santa Monica Bay Beaches Bacteria TMDL for both dry and wet weather was the first bacteria TMDL adopted by the Regional Board in the State of California. The Santa Monica Bay Beaches Bacteria TMDL was recently opened for reconsideration, although the source assessment was not part of this update. As a result, the general findings from the original source assessment remain unchanged. These findings are summarized in the 2012 Basin Plan Amendment for the reopened Santa Monica Bay Beaches Bacteria TMDL (Attachment A to Resolution No. R12-007):

“With the exception of isolated sewage spills, dry weather urban runoff and stormwater runoff conveyed by storm drains and creeks is the primary source of elevated bacterial indicator densities to beaches. Limited natural runoff and groundwater may also potentially contribute to elevated bacterial indicator densities during winter dry weather” (Regional Board, 2012).

The Santa Monica Bay Beaches Bacteria TMDL source assessment maintains that dry weather urban runoff and stormwater runoff is the primary source of elevated bacteria concentrations at Santa Monica Bay beaches. Although definitive information regarding the specific sources of bacteria within the

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watershed is not presented, speculation provided in the dry weather staff report provides some insight into possible sources:

“Urban runoff from the storm drain system may have elevated levels of bacterial indicators due to sanitary sewer leaks and spills, illicit connections of sanitary lines to the storm drain system, runoff from homeless encampments, illegal discharges from recreational vehicle holding tanks, and malfunctioning septic tanks among other things. Swimmers can also be a direct source of bacteria to recreational waters. The bacteria indicators used to assess water quality are not specific to human sewage; therefore, fecal matter from animals and birds can also be a source of elevated levels of bacteria, and vegetation and food waste can be a source of elevated levels of total coliform bacteria, specifically” (Regional Board, 2002).

The 2010-2011 and 2011-2012 Los Angeles County Municipal Stormwater Permit Individual Reports³ for the JG7 agencies report that both sanitary sewer overflows and IC/ID, while eliminated shortly after being reported, do sometimes occur in their jurisdiction (but not necessarily within the SMB JG7 WMP area).

Additionally, information on non-MS4 sources of surfzone bacteria were compiled and based on a comprehensive review of Southern California published literature, as part of comments on the reopened Bacteria TMDL (City of Malibu, 2012):

“A number of recent Santa Monica Bay studies have further identified and confirmed natural (non-anthropogenic) sources of fecal indicator bacteria (FIB) including plants, algae, decaying organic matter, beach wrack and bird feces – implicating these as potentially significant contributors to exceedances (Imamura et al, 2011; Izbicki et al, 2012). Beach sands, sediments and beach wrack have been shown to be capable of serving as reservoirs of FIB, possibly by providing shelter from ultra violet (UV) inactivation and predation by allowing for regrowth (Imamura et al, 2011; Izbicki et al, 2012; Lee et al, 2006; Ferguson et al, 2005; Grant et al, 2001; Griffith, 2012; Litton et al, 2010; Phillips et al, 2011; Jiang et al, 2004; Sabino et al, 2011; and Weston Solutions, 2010). In fact, enterococci include non-fecal or “natural” strains that live and grow in water, soil, plants and insects (Griffith, 2012). Thus, elevated levels of enterococci in water could be related to input from natural sources. The phenomenon of regrowth of FIB from either anthropogenic or natural sources has been suggested by several studies as a possible source of beach bacteria exceedances (Griffith, 2012; Litton et al, 2010; Weston Solutions, 2010; Izbicki et al, 2012; Weisberg et al, 2009).”

Other sources of bacteria during wet weather may include other non-MS4 permitted stormwater discharges such as Industrial General Permit sites, Construction General Permit sites, Phase II MS4 Sites (e.g., college campuses), State/Federal owned lands, non-MS4 open space areas such as wildlife habitat, and the California Department of Transportation (Caltrans).

A dry weather characterization study was conducted in 2002 to provide information for the management of dry weather urban flows to assist in further protecting coastal areas. The study characterized urban runoff water quality and quantity, investigated sources of flow, located previously unidentified drains, and assessed potential mitigation measures including feasibility of dry weather diversion of storm drains to the sewage system. Two of the studied outfalls were located in the JG7 WMP geographic area (SMB 7-6 and SMB 7-7). Observed dry weather flow estimates at these sites are summarized in **Table 2-8**. This study concluded that dry weather discharge did not necessarily lead to exceedances of receiving water objectives due to low flows. Additionally, the conclusion was made that the J7 outfalls are not good candidates for diversions due to low flows (County Sanitation District of Los Angeles, 2002).

³ The available Annual Reports were reviewed for 2010-2011 and 2011-2012.

Identification of Water Quality Priorities

Table 2-8
Dry Weather Flow Observations

Location	Date	Flow Estimate
SMB 7-6* (LA030)	06/13/2002	No Flow
SMB 7-6* (LA030)	08/09/2002	Trace
SMB 7-6* (LA030)	10/01/2002	No Flow
SMB 7-7 (LA010)	05/02/2002	Trace
SMB 7-7 (LA010)	05/13/2002	<0.001 cfs

*Observation was made upstream of 7-6

On March 4, 2008, Jurisdictional Group 7 received notices of violation and corresponding orders from the LARWQCB pertaining to the LA MS4 waste discharge requirements. Water sample data from the summer dry weather periods of September 14, 2006 to October 31, 2006 and April 1, 2007 to October 31, 2007 reported exceedances of Enterococcus bacteria levels at monitoring location SMP 7-7. There were 9 alleged instances of violations cited in the notices, four of which were single sample exceedances and five were geometric mean exceedances. A source investigation was conducted to determine the cause of the single sample bacteria exceedances. A site survey conducted on March 14, 2008 revealed potential sources at the discharge point to be episodic human activity, homes along the shoreline, domestic animals, natural occurrences including bird and mammals, sewer system overflow, feral cats, compost pile, and septic systems (Santa Monica Bay Beaches Bacterial TMDL Jurisdiction Group 7, 2008).

2.3.2 DDT and PCBs

As stated previously, limited data are available to characterize sources of DDT and PCBs within Santa Monica Bay, particularly since direct discharges of these pollutants from publically-owned treatment works (POTWs) have ceased. The largest concentration of DDT and PCBs within Santa Monica Bay is contained within the Palos Verdes shelf, which is being addressed by the USEPA as a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site. Loadings from the shelf to the Bay are large and have been well characterized (USEPA, 2012).

With respect to stormwater, the TMDL does not specifically characterize MS4 loadings, though it does recognize that “DDT and PCBs are no longer detected in routine stormwater sampling from Ballona Creek or Malibu Creek.” However, the TMDL also states that current detection limits used to analyze DDT and PCB concentrations are too high to appropriately assess the water quality.

No other data or source information is available at this time. Once three years of water quality data are collected as part of the CIMP and evaluated consistent with the recommendations by USEPA in the TMDL to utilize a three-year averaging period⁴, then further source assessment will be considered and the categorization and prioritization of PCB and DDTs as MS4-related pollutants of concern will be reevaluated.

⁴ The three-year averaging period is recommended by the USEPA TMDL in Section 8.2, which reads, “We recommend that stormwater waste load allocations be evaluated based on a three year averaging period” (USEPA, 2012). Additionally, Permit Attachment M states that compliance with the PCB and DDT waste load allocations shall be determined based on a three-year averaging period.

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The Permit specifies that control measures, also referred to as BMPs, shall be identified to ensure that stormwater discharges meet RWLs and WQBELs as established in the Permit and to reduce overall impacts to receiving waters from stormwater and non-stormwater runoff.

BMPs are typically grouped into two broad categories, structural and institutional. Structural BMPs are physically-constructed control measures that alter the hydrology or water quality of stormwater or non-stormwater within the MS4 and are designated as either centralized or distributed based on their location within a watershed and size of contributing drainage area. Institutional BMPs are source control measures that prevent the release of flow/pollutants or transport of pollutants within the MS4 area, but do not involve construction of physical facilities. Minimum control measures (MCMs) are a subset of institutional BMPs.

Due to the zero required load reductions and the SMB JG7 WMP geography (outfalls are located on unstable cliffs and there are landslide and liquefaction hazards throughout the SMB JG7 WMP area), there are currently no centralized or distributed BMPs other than trash exclusion devices planned in the SMB JG7 WMP area at this time. In the event that CIMP monitoring demonstrates a need for quantitative RAA modeling and BMP implementation, BMPs may be selected based on performance data, subsurface conditions, land uses within the contributing drainage areas, and other relevant characteristics.

3.1 Minimum Control Measures/Institutional BMPs

The Permit requires the implementation of MCMs in Parts VI.D.4 through VI.D.10. These MCMs are similar to the programs required under the previous MS4 Permit (Order No. 01-182).

Although the previous MS4 Permit required implementation of MCMs, some of the key modifications introduced by the current MS4 Permit related to MCMs include:

- The Permit calls for more outreach and education as part of the Public Information and Participation Program (PIPP). Permittees, for example, will be required to maintain a website with stormwater-related educational materials.
- Permittees are expected to record additional information on industrial and commercial facilities within their jurisdiction as part of their Industrial/Commercial Facilities Program. For example, industrial/commercial facilities records will need to list receiving waters for which each respective facility is tributary to.
- The Permit provides more detailed criteria on BMP sizing and specification for use in the Permittees' Planning and Land Development Program, formerly the Development Planning Program, and calls for cumulative annual reporting of implemented mitigation projects.
- An Erosion and Sediment Control Plan (ESCP), which includes elements of a Storm Water Pollution Prevention Plan (SWPPP), replaces the Local SWPPP (L-SWPPP) as a required document for construction activities meeting certain criteria as a prerequisite to building/grading permit issuance.
- The Permit also requires Permittees to use an electronic tracking system to track construction activities within their jurisdiction and mandates more frequent inspection schedules.
- The Public Agency Activities Program includes new requirements such as: implementing an integrated pest management program and tracking pesticide inventory, training of field staff including contracted staff in illicit discharge identification and reporting, creating an inventory of

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public facilities with the potential to cause stormwater pollution, and to maintain an inventory of pollutant sources at these facilities.

A comprehensive comparison between program requirements of the previous and current MS4 Permits is summarized in **Table 3-1**. Permittee activities under the Storm Water Management Program are summarized in the Los Angeles County Unified Annual Stormwater Reports; the report for the most recent reporting year is available at <http://ladpw.org/wmd/npdesrsa/annualreport/index.cfm> (Los Angeles County Department of Public Works, 2012).

As required by the Permit, the agencies in the SMB JG7 WMP group are continuing to implement the MCMs required under the 2001 MS4 Permit until the WMP is approved by the Regional Board. Applicable new MCMs will be implemented by the time the WMP is approved by the Regional Board. A brief description of each Program MCM and the tasks associated with each are summarized next. The implementation summaries of the Program MCM tasks identified are available in the Unified Annual Stormwater Report published by the Los Angeles County Department of Public Works. Documentation that the City and LACFCD hold legal authority to implement the MCMs required under the 2001 MS4 Permit can be found in Attachment B.

The agencies in the SMB JG7 WMP group have also developed mechanisms for tracking information related to new development/re-development projects that are subject to post-construction BMP requirements in Part VI.D.7 of the MS4 Permit.

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Table 3-1
Comparison of Stormwater Management Program MCMs

Program Element	Activity	Previous Permit (Order No. 01-182)	Current Permit (Order No. R4-2012-0175)
Public Information and Participation Program	Public Education Program - advisory committee meeting (once per year)	X	
	"No Dumping" message on storm drain inlets (by 2/2/2004)	X	
	Reporting hotline for the public (e.g., 888-CLEAN-LA)	X	X
	Outreach and education	X	X
	Make reporting info available to public	X	X
	Public service announcements, advertising, and media relations	X	X
	Public education materials - proper handling	X	X
	Public education materials - activity specific	X	X
	Educational activities and countywide events	X	X
	Quarterly public outreach strategy meetings (by 5/1/2002)	X	
	Constituent-specific outreach information made available to public	X	X
	Business Assistance Program	X	
	Educate and inform corporate managers about stormwater regulations	X	
	Maintain storm water websites		X
	Provide education materials to schools (50 percent of all K-12 children every two years)	X	X
	Provide principle permittee with contact information for staff responsible for storm water public educational activities (by 4/1/2002)	X	X
	Principal permittee shall develop a strategy to measure the effectiveness of in-school education programs	X	
	Principle permittee shall develop a behavioral change assessment strategy (by 5/1/2002)	X	
	Educate and involve ethnic communities and businesses (by 2/3/2003)	X	X
	Reporting hotline for the public (e.g., 888-CLEAN-LA)	X	X
Industrial/Commercial Facilities Program Industrial/Commercial Facilities Program	Track critical sources – Restaurants	X	X
	Track critical sources - Automotive service facilities	X	X
	Track critical sources – RGOs	X	X
	Track critical sources - Nurseries and nursery centers		X
	Track critical sources – USEPA Phase I facilities	X	X
	Track critical sources - Other federally-mandated facilities [40 Code of Federal Regulations (CFR) 122.26(d)(2)(iv)(C)]	X	X
	Track critical sources - Other commercial/industrial facilities that Permittee determines may contribute substantial constituent load to MS4		X
	Facility information - Name of facility	X	X
	Facility information - Contact information of owner/operator	Name only	X
	Facility information - Address	X	X
	Facility information – North American Industry Classification System (NAICS) code		X
	Facility information – Standard Industrial Classification (SIC) code	X	X
	Facility information - Narrative description of the activities performed and/or principal products produced	X	X
	Facility information - Status of exposure of materials to storm water		X
	Facility information - Name of receiving water		X
	Facility information - ID whether tributary to 303(d) listed water and generates constituents for which water is impaired		X
	Facility information - NPDES/general industrial permit status	X	X
	Facility information - No Exposure Certification status		X
	Update inventory of critical sources annually	X	X
	Business Assistance Program	Optional	X
	Notify inventoried industrial/commercial sites on BMP requirement		Once in 5 years
	Inspect critical commercial sources (restaurants, automotive service facilities, retail gasoline outlets and automotive dealerships)	Twice in 5 years	Twice in 5 years
	Inspect critical industrial sources (phase 1 facilities and federally-mandated facilities)	Twice in 5 years ¹	Twice in 5 years ²
	Verify No Exposure Certifications of applicable facilities		X
	Verify Waste Discharge Identification (WDID) Number of applicable facilities	X	X
	Source control BMPs	X	X
	Provisions for Significant Ecological Areas (SEAs) (Environmentally Sensitive Areas (ESAs))	X ³	X
Progressive enforcement of compliance with stormwater requirements	X	X	
Interagency coordination	X	X	
Planning and Land Development Program	Peak flow control (post-development stormwater runoff rates, velocities, and duration)	X	X ⁴
	Hydromodification Control Plan	In lieu of countywide peak flow control	X
	SUSMP (by 3/3/03)	X	
	Volumetric treatment control (SWQDv) BMPs	X	X
	Flow-based treatment control BMPs	X	X
	Require implementation of post-construction Planning Priority Projects as treatment controls to mitigate storm water pollution (by 3/10/2003)	X	X
	Require verification of maintenance provisions for BMPs	X	X
	California Environmental Quality Act process update to include consideration of potential stormwater quality impacts	X	
	General Plan update to include stormwater quality and quantity management considerations and policies	X	
	Targeted employee training of development planning employees	X	
	Bioretention and biofiltration systems		X
	SUSMP guidance document	X	
	Annual reporting of mitigation project descriptions		X
Development Construction Program	Erosion control BMPs	X	X
	Sediment control BMPs	X	X
	Non-storm water containment on project site	X	X
	Waste containment on project site	X	X
	Require preparation of a Local SWPPP for approval of permitted sites	X	X
	Inspect construction sites on as-needed basis		X
	Inspect construction sites equal to or greater than one acre	Once during wet	Once every two

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Program Element	Activity	Previous Permit (Order No. 01-182)	Current Permit (Order No. R4-2012-0175)
		season	weeks ⁵ , monthly
	Electronic tracking system (database and/or Geographic Information System)		X
	Required documents prior to issuance of building/grading permit	L-SWPPP	ESCP/SWPPP
	Implement technical BMP standards		X
	Progressive enforcement	X	X
	Permittee staff training	X	X
Public Agency Activities Program	Public construction activities management	X	X
	Public facility inventory		X
	Inventory of existing development for retrofitting opportunities		X
	Public facility and activity management	X	X
	Vehicle maintenance, material storage facilities, corporation yard management	X	X
	Landscape, park, and recreational facilities management	X	X
	Storm drain operation and maintenance	X	X
	Streets, roads, and parking facilities maintenance	X	X
	Parking facilities management	X	X
	Emergency procedures	X	X
	Alternative treatment control BMPs feasibility study	X	
	Municipal employee and contractor training		X
	Sewage system maintenance, overflow, and spill prevention	X	X
Illicit Connection/Illicit Discharge (IC/ID) Elimination Program	Implementation program	X	X
	MS4 Tracking (mapping) of permitted connections and illicit connections and discharges	X	X
	Procedures for conducting source investigations for IC/IDs	X	X
	Procedures for eliminating IC/IDs	X	X
	Procedures for public reporting of ID		X
	IC/ID response plan	X	X
	IC/IDs education and training for staff	X	X

¹ Tier 2 facilities may be inspected less frequently if they meet certain criteria

² Subject to change based on approved JG7 WMP strategy

³ For environmentally sensitive areas and impaired waters

⁴ Maintain pre-project runoff flow rates via hydrologic control measures

⁵ Sites of threat to water quality or discharging to impaired water; frequency dependent on chance of rainfall

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3.1.1 Customization of MCMs

In lieu of the requirements of Parts VI.D.4 through VI.D.10 of the Permit, the SMB JG7 WMP Group may customize MCMs within each of the general categories. The motivation for considering customization is made more apparent in the Regional Board's response to a comment that the Permit should establish criteria that will be used to support any customization of MCMs; the Regional Board responded with the following:

The Order specifies that at a minimum, Permittees' programs shall be consistent with 40 CFR section 122.26(d)(2)(iv)(A)-(D). In response to comments that the Order is overly prescriptive, specifying criteria could restrict customization within these categories of minimum control measures. The criterion to allow customization is based on showing equivalent effectiveness, for example, a municipality who has identified a group of facilities within their jurisdiction as the largest source of constituents could be allowed to focus their inspection efforts on controlling the constituents from this subset of facilities.

http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/StormSewer/CommentLetters/E_MCM%20Matrix%2010-26-12%20Final.pdf

The opportunity for customization may provide benefit by allowing the SMB JG7 WMP Group to assess the effectiveness of their current programs and to modify their programs to better serve local conditions and objectives. If an effectiveness assessment is conducted on a specific MCM activity and it can be reasonably shown that customization of the MCM would result in equal or improved effectiveness on attitudes or knowledge, behavior or implementation, load reduction, or water quality, then a defensible recommendation for modification of that activity can be made, resulting in greater resources available for more effective activities.

The SMB JG7 WMP Group is not planning to customize MCM activities at this time. However, in the event that MCM customization would be beneficial to the identified WBPCs or if CIMP results indicate adjustments would be beneficial and/or needed, the first step in customizing MCM activities would be the development of a framework to assess the effectiveness of each MCM in its current implementation. For each MCM that can be assessed in this manner, recommendations for customizations can be developed with reasonable assurance of impact to effectiveness.

The California Stormwater Quality Association (CASQA) provides such a framework for the effectiveness assessment of Stormwater Management Programs (CASQA, 2006). The outcome is a hierarchy that categorizes the classification of outcome types (levels) that will allow MCMs to be placed into one or more categories for subsequent outcome assessment. The outcome levels, Level 1 through Level 6, are summarized in **Figure 3-1**.

Figure 3-1
General Classification of Outcome types (adapted from CASQA)

	Benefits	Limitations
Level 6 - Changes in Receiving Water Quality	<ul style="list-style-type: none"> Achieves ultimate goal of protection of receiving water 	<ul style="list-style-type: none"> Very difficult to determine for specific MCMs Sees influence from non-MS4 sources
Level 5 - Changes in Urban Runoff and Discharge Quality	<ul style="list-style-type: none"> Indicates direct impact on water quality 	<ul style="list-style-type: none"> Requires substantial monitoring
Level 4 - Load Reductions	<ul style="list-style-type: none"> Controls the source Valuable for making broad comparisons 	<ul style="list-style-type: none"> Requires development of a baseline to estimate
Level 3 - Behavioral Change and BMP Implementation	<ul style="list-style-type: none"> Great first indicator of potential water quality improvement 	<ul style="list-style-type: none"> Requires observation and inspection
Level 2 - Changes in Attitudes, Knowledge, and Awareness	<ul style="list-style-type: none"> Can provide the basis for measuring behavioral change 	<ul style="list-style-type: none"> Many different factors influence levels of public involvement
Level 1 - Compliance with Activity-Based Permit Requirements	<ul style="list-style-type: none"> Easy to determine (reporting) 	<ul style="list-style-type: none"> Does not indicate direct impacts

3.1.2 MCMs and Outcome Levels

The outcome types in this effectiveness assessment framework are interrelated. The Permit’s stormwater management program is, by design, intended to improve the water quality in receiving waters. The means by which this goal is intended to be met is through the implementation of compliance measures by the SMB JG7 WMP Group. Compliance with these activity-based measures results in Level 1 outcomes. Assessments of these activities can provide further understanding of the outcomes they have. Ideally, each activity will contribute to the improvement at the Level 6 receiving water quality level; however, tracking effectiveness at this level is difficult.

A summary of the MCM activities of the agencies within the SMB JG7 WMP Group is included in the 2011-12 Annual Stormwater Report (Los Angeles County Department of Public Works, 2012). In addition to the standard reporting, the agencies answered a list of questions in an Assessment of Program Effectiveness. This summary largely includes responses that may be considered as Level 1 outcomes (compliance) with Level 2, Level 3, and Level 4 outcomes for select MCMs. Several obstacles inhibit the ability to achieve a Level 5 or Level 6 assessment, including:

- Available budget;
- Lack of comprehensive monitoring;
- Timing of MCM activities and corresponding runoff events; and/or
- General complexity of the hydrology and conveyance.

All SMB JG7 WMP Group members were in compliance with the Permit during the 2011-12 reporting year (Level 1 outcome). **Table 3-3** summarizes effectiveness assessment metrics and potential outcomes associated with select MCMs within each Program Element of the Storm Water Management Program. The following is a brief description of the Program MCMs and outcome levels that can be achieved through the effectiveness assessment framework described.

Public Information and Participation Program

The PIPP is intended primarily to reach out and educate the general public, students, business owners, facility operators, city staff, and others on stormwater. This outreach is accomplished in many ways; examples include “No Dumping” messages on storm drain inlets; public education materials; information

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websites; community events; reporting hotlines; and specialized awareness programs, such as the used oil program. The program elements are intended to directly impact awareness and the behavior of different target audiences (Level 2 and Level 3 outcomes). Consequently, these behavioral changes may impact constituent loads to the MS4 indirectly, but the actual Level 4 through Level 6 impact of a specific MCM in this category may be difficult to quantify.

Industrial/Commercial Facilities Program

Permittees are required to conduct an Industrial/Commercial Facilities Program designed to prevent illicit discharges, reduce discharges of stormwater, and prevent industrial/commercial discharges to the MS4 from causing or contributing to receiving water quality exceedances. These facilities are tracked and inspected to ensure use of BMPs to control stormwater discharges. In addition, the program aims to contribute to the education of business owners and facility operators regarding SWPPP. The effectiveness of this program can be assessed leading to insight on how awareness (Level 2) and BMP implementation (Level 3) are affected.

Planning and Land Development Program

The Planning and Land Development Program involves developers early in the land development stage, with the integration of BMPs and Low Impact Development (LID) controls to reduce constituent loading to the MS4 and minimize runoff intensity generated from impervious areas. Behavioral change (Level 3) can be assessed through permitting staff observations. Also, it may be possible to assess constituent load reductions (Level 4) through land developer BMP choices and water quality of runoff entering the MS4 (Level 5) if monitoring stations are considered during the planning stage of development and redevelopment.

Development Construction Program

Similar to the Planning and Land Development Program, the Development Construction Program establishes requirements for construction activities to eliminate illicit discharges and prevent water quality violations from stormwater discharges from the construction site. The Program establishes criteria for BMPs and controls through an Erosion and Sediment Control Plan, with elements of a SWPPP. The effectiveness of this program can be assessed through inspections to verify BMP implementation (Level 3). Level 2 awareness outcomes can be assessed through the use of a website that informs contractors on proper BMP selection and prerequisite checklists for permitting.

Public Agency Activities Program

Activities ranging from street sweeping, catch basin cleaning, public facility maintenance, and storm drain operation fall under the Public Agency Activities Program. These activities are essential MCMs that can also be measured for effectiveness. Level 3 through Level 5 outcomes (behavior, load reduction, MS4 water quality) can all be assessed through appropriate evaluation metrics. The impact to receiving water quality (Level 6) may be possible to determine if appropriate monitoring is in place, with phased implementation of MCM activities to isolate performance evaluation.

Illicit Connections and Illicit Discharges Elimination Program

IC/IDs are controlled through the IC/ID Elimination Program and by implementing a procedure for reporting, tracking, and responding to reports of IC/IDs, as well as establishing protocols for the regular inspection of storm drains. The effectiveness of the reporting procedure can be assessed on a Level 2 (awareness) basis, and response activities can have their effectiveness determined directly through monitoring of the MS4 water quality (Level 5). A quantitative analysis of behavioral change (Level 3) as a result of enforcement actions is also achievable.

Catch Basin Retrofit Program

The City of Los Angeles JG7 WMP area contains 218 catch basins, all of which will be retrofitted with catch basin inserts in order to comply with the Santa Monica Bay Nearshore and Offshore Debris TMDL requirements. The catch basin inserts meet the RWQCB definition of full capture device as described in the TMDL and the 5-millimeter perforated inserts can treat a storm flow of a 1-year, 1-hour storm. Catch

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basin inserts are planned for installation according to the schedule presented in **Table 3-2** (City of Los Angeles, TRMP, 2012). Agencies responsible for the implementation of the catch basin retrofit program include Los Angeles Flood Control District, and the City of Los Angeles. The City of Los Angeles will retrofit all catch basins, including those owned by the LACFCD. In turn, the LACFCD will work with the City of Los Angeles to issue permits for installation of full capture devices on all LACFCD-owned catch basins.

Table 3-2
Catch Basin Retrofit Implementation Schedule

RWQCP Implementation Goal	Date
57 catch basin opening cover and/or insert retrofits (cumulative) (26% of load reduced)	December 2015
161 catch basin opening cover and/or insert retrofits (cumulative) (100% of load reduced)	July 2016

3.1.3 Next Steps to MCM Customization

The assessment framework outlines the process to determine baseline MCM effectiveness, providing the foundation for customization. Pending the results of the approved CIMP, opportunities for modifying MCM activities may be proposed by the SMB JG7 WMP Group as part of the adaptive management process.

It should be noted, however, that institutional BMPs (or MCMs) such as street and median sweeping implementations, drain inlet and conveyance system cleaning, pet waste program enhancements, etc. are expected to continue to cumulatively result in a pollutant load reduction of up to or approximately 5%. Additionally, assuming past data also reflect future trends, it is anticipated that 0.1 – 0.2% of residential, commercial, and industrial properties will implement LID annually through development or redevelopment projects⁵. Although RWLs are currently being met, it is anticipated that implementation of LID will further enhance the water quality in this region.

⁵ 0.1% annual estimate is based on a review of development/redevelopment projects within the SMB JG7 WMP Group area over the past 10 years assuming a 0.2 acre lot size. 0.2% annual estimate is based on the area-weighted projected development/redevelopment rate for residential, commercial, and industrial land uses reported by the City in the Ballona TMDL Implementation Plan.

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Table 3-3
Effectiveness Assessment Measures for Various Activities under the Storm Water Management Program

Program MCM	Permittee Activity	Possible Assessment Metric	Outcome Level
Public Information and Participation Program	Advertising / media campaigns (e.g., Used Oil / Used Oil Filter Program)	Year-over-year change in no. of impressions	L2
		Survey results	L2, L3
	Educational programs (e.g., Generation Earth, Environmental Defenders, public workshops)	Year-over-year change in attendance	L2
		Quiz results	L2, L3
	E-Waste collection events	Amount of Household Hazardous Waste/E-Waste	L3, L4
	888-CLEAN-LA hotline	Change in no. of calls	L2
www.888CleanLA.com	No. of unique visitors / document downloads	L2	
Industrial/Commercial Facilities Program	Website on program details	No. of unique visitors / document downloads	L2
	Electronic tracking	Inspections: change in no. of Notices of Violation (NOV) / non-compliance	L3
Planning and Land Development Program	Pre-permitting assessment	No. of developers incorporating BMPs and LID in early-stage	L3
	Annual reporting	% of stormwater capture	L3, L4
	Integrated control measures	Measure performance through planned monitoring	L5
Development Construction Program	Website on program details	Number of hits / document downloads	L2
	Electronic tracking	Inspections: change in no. of NOV / non-compliance	L3
Public Agency Activities Program	Street sweeping	Street sweeper fleet (technology)	L3
		Year-over-year change in debris collected	L3, L4
	Catch basin cleaning	Year-over-year change in trash collected	L3, L4
	Installation of trash receptacles	Observations: cleanliness of public roadways	L3
	Sanitary sewer overflow response	Monitoring results of MS4 water quality	L5
IC/ID Elimination Program	IC/ID reporting hotline	Year-over-year change in no. of calls	L2
	Termination of IC/ID	Outfall monitoring: change in water quality	L5
	Enforcement actions	Change in occurrence	L3
Other	Support for Senate Bill (SB) 346 (Brake Pad Initiative)	% of vehicles with reduced-copper-content brake pads	L4

Reasonable Assurance Analysis

Typically, an important component of the WMP is the RAA. The RAA is a process that is used to demonstrate that institutional and structural control measures are expected to be sufficient for achieving applicable WQBELs and/or RWLs for the water body pollutant combinations that have compliance deadlines within the Permit term. In addition to using the RAA as a means to determine the efficacy of existing and potential control measures, the RAA also facilitates the selection of BMPs as well as the prioritization of BMP implementation.

For the SMB JG7 WMP, there are currently zero required load reductions for the Category 1 WBPCs: bacteria at the Santa Monica Bay Beaches and PCBs/DDTs in the Santa Monica Bay. Compliance with the Debris TMDL is being demonstrated through retrofitting of catch basins as outlined in the Trash Monitoring and Reporting Program (City of Los Angeles Department of Public Works, 2012). No Category 2 or Category 3 WBPCs have been identified based on currently available monitoring data. Furthermore, it is anticipated that implementation of MCMs and related activities will progressively improve water quality.

Therefore, no quantitative RAA modeling is required for this WMP. For purposes of completeness, however, each Category 1 WBPC is qualitatively discussed below.

4.1 Bacteria

Because the compliance monitoring locations within the SMB JG7 WMP geographical area, SMB 7-6, SMB 7-8, and SMB 7-9 are subject to antidegradation conditions (i.e., the beaches have fewer exceedance days than the reference beach), there is therefore a zero required load reduction for bacteria (because target load reductions are set equal to the load of the reference beach), and reasonable assurance is demonstrated. Additionally, when occasional exceedances were investigated, the cause was often the results of isolated local beach activities, which were ceased upon discovery. As part of the adaptive management process based on monitoring data collected through the approved CIMP, structural and/or nonstructural BMPs may be proposed if needed.

4.2 PCBs and DDTs

The Santa Monica Bay TMDL for DDTs and PCBs developed WLAs for stormwater throughout the Santa Monica Bay watershed. Because the SMB JG7 WMP group area contribution is not distinctly defined in the TMDL, the WLAs assigned to the entire Santa Monica Bay WMA as a whole are being used for this discussion. Table 6-3 in the TMDL lists the existing annual DDT and PCB loads as compared to the annual maximum allowable loads. The existing estimated loads for all of Santa Monica Bay and most of the individual watersheds are estimated to be lower than the maximum allowable loads. As such, the WLAs for the entire Santa Monica Bay WMA were set equal to the existing estimates of annual loads for DDTs and PCBs as 28 grams per year (g/yr) and 145 g/yr, respectively. Therefore, there is a zero required load reduction for PCBs and DDTs, and reasonable assurance is demonstrated.

As part of the adaptive management process based on monitoring data collected through the approved CIMP, additional structural and/or nonstructural BMPs may be proposed if needed. Additionally, if the loads are found to be higher than estimated, but still less than the maximum allowable loads, there may be potential for the WLA to be revised.

Reasonable Assurance Analysis

4.3 Debris and Plastic Pellets

Compliance with the Debris TMDL will be met through a phased retrofit of all 218 catch basins throughout the JG7 WMP area (182 City owned and 36 County owned) by 2016, ahead of the Regional Board implementation goals for 2020 completion date. Consistent with the City's Trash Monitoring and Reporting Plan (TMRP) (City of Los Angeles Department of Public Works, 2012), *“vertical insert[s] with 5-mm openings and flow activated opening screen covers are the best suited for implementation within the City to achieve compliance with Trash TMDLs”*.

There are no industrial facilities within the SMB JG7 WMP area that use, store, transport, manufacture, or handle plastic pellets. Therefore, the City's Plastic Pellet Monitoring and Reporting Plan (PMRP) will only include an emergency response plan.

Adaptive Management Process

The Notice of Intent submitted to the Regional Board in December 2013 provided a schedule of interim milestones for the development of the CIMP and WMP Plan. At this time, the SMB JG7 WMP Group does not anticipate any deviations from the schedule. Completed milestones and projected completion dates for future milestones are presented in **Table 5-1**. The catch basin retrofit schedule, as provided in the TMRP, is also included in the table.

Table 5-1
WMP Schedule of Interim and Final Milestones

Deliverable	Planned Date of Completion
Submit Revised Final Draft WMP to the Regional Board	January 2015
Submit Final Draft CIMP to the Regional Board	June 2014
Submit Revised Final CIMP to the Regional Board	April 2015
57 catch basin opening cover and/or insert retrofits (cumulative) (26%)	December 2015
161 catch basin opening cover and/or insert retrofits (cumulative) (74%)	July 2016

The WMP is intended to be implemented as an adaptive program. As new program elements are implemented and information is gathered over time, the WMP will undergo modifications to reflect the most current understanding of the watershed and present a sound approach to addressing changing conditions. As such, the WMP will employ an adaptive management process that will allow the WMP to evolve over time.

5.1 Compliance Schedule

The compliance deadlines in the Santa Monica Bay Beaches Bacteria TMDL are currently in effect for SMB 7-6, SMB 7-8, and SMB 7-9. A new SMB 7-7 will be identified to replace the previous site that was destroyed by a landslide, this location will be identified in the revised CIMP. The EPA TMDL for PCBs and DDTs does not include a compliance schedule for the WLAs for the Santa Monica Bay WMA. However, to demonstrate compliance with the TMDL, DDTs and PCBs will be assessed by monitoring the sediment fraction at the J7 MS4 outfall monitoring point using a three year averaging period, with the first compliance assessment three years after CIMP implementation.

Part VI.C.8 of the Permit details the adaptive management process to be included in the WMP that includes the following requirements:

- i. Permittees shall adapt the WMP to become more effective every two years from the date of program approval based on, but not limited to, a consideration of:
 - (1) Progress toward achieving WQBELs and/or RWLs;
 - (2) Permittee monitoring data;
 - (3) Achievement of interim milestones;
 - (4) Re-evaluation of water quality priorities and source assessment;

Adaptive Management

- (5) Non-Permittee monitoring data;
 - (6) Regional Board recommendations; and
 - (7) Recommendations through a public participation process.
- ii. Permittees shall report any modifications to the WMP in the annual report.
 - iii. Permittees shall implement any modifications to the WMP upon approval by the Regional Board or within 60 days of submittal if the Regional Board expresses no objections.

The adaptations to the WMP as called for in the adaptive management process essentially include a re-evaluation of water quality priorities, an updated source assessment, an effectiveness assessment of watershed control measures, and a RAA. The CIMP will gather additional data on receiving water conditions and stormwater/non-stormwater quality to inform these analyses. This process will be repeated every two years as part of the adaptive management process.

5.2 Re-Characterization of Water Quality Priorities

Water quality within the SMB JG7 WMP Group will be re-characterized using data collected as part of the approved CIMP. WBPCs may be updated as a result of changing water quality. Category 3 WBPCs will be identified based on data collected as part of the approved CIMP. These classifications will be important for refocusing improvement efforts and informing the selection of future watershed control measures.

Demonstration that MS4 discharges have caused or contributed to the exceedance of receiving water limitations will be made if the following criterion has been met:

- Simultaneously collected water samples, as consistent with the CIMP, exceed the receiving water limitations as sampled in the receiving water and exceed the WQBELs, action levels as defined in Appendix G, or receiving water limits, in that order, at the MS4 outfall.
-

5.3 Source Assessment Re-evaluation

The assessment of possible sources of water quality constituents will be re-evaluated based on new information from stormwater outfall monitoring, receiving water monitoring, and from Non-Stormwater Outfall Screening and Monitoring Program (Non-Stormwater Program) which are part of the CIMP implementation efforts

The SMB J7 Revised CIMP (2015) maintains that the Non-Stormwater Program provides an assessment of whether significant non-stormwater discharges are potentially impacting the receiving water and determines whether significant non-stormwater discharges are allowable. To this end, all major outfalls will be screened prior to dry-weather monitoring through an outfall monitoring and screening program. The outfall screening program will include updating outfall inventory, measuring observed flows, and testing for E.coli where flows are observed. If an outfall exhibits significant non-stormwater discharges, the SMB JG7 WMP Group will complete source identification activities. The information collected through monitoring and source identification efforts will be used to determine if the site is attributed to illicit discharges (City of Los Angeles, 2014).

Adaptive Management

An initial field survey was conducted for the identification of outfalls in the JG7 WMP Group area on April 15, 2014⁶. The SMB JG7 Group will perform three outfall screenings in the first year after CIMP approval. If any outfalls are identified as producing significant non-stormwater discharges, based on flow and bacteria sampling, a source identification investigation will be conducted to identify potential sources of non-stormwater discharge which may include taking field measurements to characterize the discharge, following dry-weather flows upstream, or compiling and reviewing available resources such as past monitoring data or aerial photography.

If the source is determined to be an illicit discharge, then the Permittee must implement procedures to eliminate the discharge consistent with IC/ID requirements and document actions. If the source is authorized, conditionally exempt, or originating from natural flows, then the source will be documented per CIMP requirements. If the source is unknown, then the Permittee must conduct monitoring consistent with Part IX.G of the Monitoring and Report Program MRP. Finally, for sources originating upstream of the SMB JG7 WMP Group, the Permittee must inform the upstream WMA and Regional Board within 30 days.

The identification of non-MS4 and MS4 pollutant sources is an essential component of the WMP because it determines whether the source can be controlled by watershed control measures. As further monitoring is conducted and potential sources are better understood, the assessment becomes more accurate and informed.

5.4 Effectiveness Assessment of Watershed Control Measures

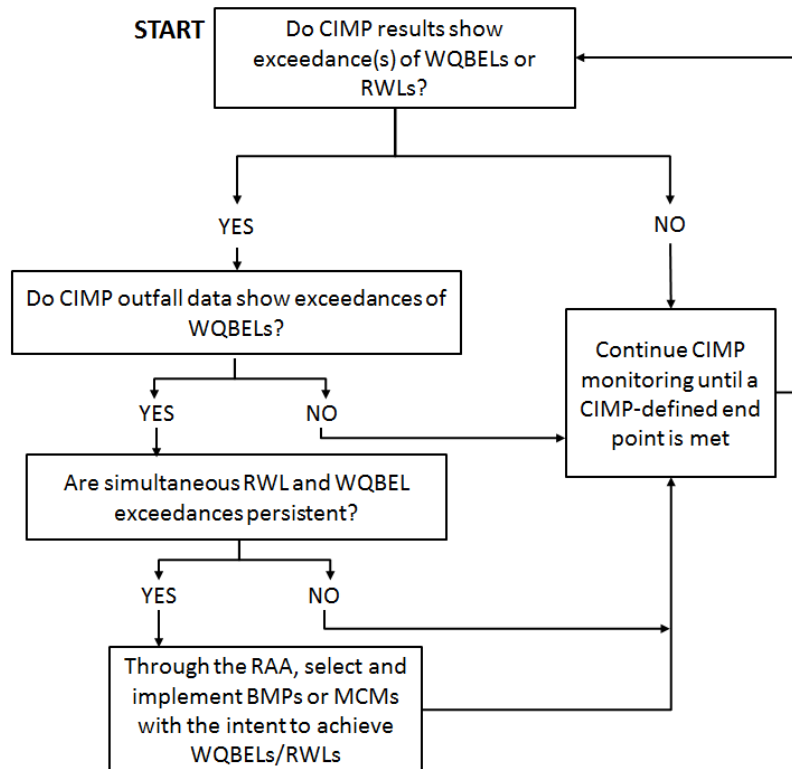
The evaluation of BMP effectiveness is an important part of the adaptive management process and the overall WMP. Implementation of the CIMP can provide a quantitative assessment of structural BMP effectiveness, if BMPs are implemented in the future, as it relates to actual pollutant load reduction to determine how selected BMPs have performed at addressing established water quality priorities. In addition, the adaptive management process is a required step for the customization of MCMs as detailed previously. Effectiveness assessment becomes important for the selection of future control measures to be considered.

5.5 Update of Reasonable Assurance Analysis

The RAA is an iterative process that depends on the continuous refinement and calibration of the watershed models when used. Data gathered as a result of the CIMP will support adaptive management at multiple levels, including (1) generating data not previously available to support model updates (if through the course of the CIMP, modeling becomes necessary in the SMB JG7 WMP), and (2) tracking improvements in water quality over the course of WMP implementation. This process is illustrated in **Figure 5-1**.

⁶ The survey conducted in 2014 was based on the SMB JG7 WMP boundary as defined by the Regional Board's EWMP shapefile provided on their website. However, this boundary has since been revised to include the Point Fermin area and will be updated in the Revised CIMP.

Figure 5-1
Adaptive Management Process



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Attachment A

Santa Monica Bay Shoreline Monitoring Data within SMB JG7 WMP Group Area

Table A1 – Average, Median, Minimum, and Maximum of Results for Santa Monica Bay Shoreline Monitoring Data (SMB JG7 WMP Group Area). Years defined as November 1 – October 31.

Analyte	Event Type	Station	Average (MPN/100ml)						Median (MPN/100ml)						Min (MPN/100ml)						Max (MPN/100ml)					
			2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Total Coliform	Dry-Summer	SMB 7-6	83	34.2	43	28	102	95	12	18	31	18	36	59	1	3	3	1	1	4	950	140	240	120	1400	340
Total Coliform	Dry-Winter		21	391	29	131	91	39	8.5	31	16	20	34	18	3	1	1	4	5	8	160	3600	78	570	540	120
Total Coliform	Wet		102	352	244	173	796	94	98	230	73	71	90	66	4	18	4	4	4	12	240	1000	1600	800	8000	310
Fecal Coliform	Dry-Summer		25	9.6	9.3	12	41	14	2.5	3.5	4	5.5	9	6	1	1	1	1	1	1	580	50	56	72	580	110
Fecal Coliform	Dry-Winter		9.9	34	13	101	52	16	2	8.5	3.5	7	16	8	1	1	1	1	1	4	100	250	78	480	470	62
Fecal Coliform	Wet		11	27	21	24	43	35	6.5	32	5	13	11	8	1	5	1	3	1	1	44	40	100	78	260	160
Enterococcus	Dry-Summer		25	12	16	17	17	11	2	3	4	7.5	4	4	1	1	1	1	1	1	360	78	260	90	120	160
Enterococcus	Dry-Winter		11	197	39	158	35	13	4	16	14	7.5	10	4	1	1	1	1	1	1	44	2600	140	1700	190	62
Enterococcus	Wet		119	76	82	99	142	6.8	46	69	24	14	42	6	1	12	1	1	1	3	560	170	270	1000	1200	16
Total Coliform	Dry-Summer	SMB 7-7	31	404	-	24	-	-	8.5	5	-	24	-	-	1	1	-	24	-	-	200	7800	-	24	-	-
Total Coliform	Dry-Winter		49	37	-	-	-	-	16	9	8.5	-	-	-	1	1	1	-	-	-	440	440	16000	-	-	-
Total Coliform	Wet		157	257	-	24	-	-	68	90	24	-	-	-	41	1	-	24	-	-	420	1100	-	24	-	-
Fecal Coliform	Dry-Summer		7.4	159	-	24	-	-	1	1	-	24	-	-	1	1	-	24	-	-	68	4200	-	24	-	-
Fecal Coliform	Dry-Winter		20	8.4	-	-	-	-	1	2	6	-	-	-	1	1	1	-	-	-	230	86	7400	-	-	-
Fecal Coliform	Wet		21	40	-	24	-	-	20	34	24	-	-	-	2	1	-	24	-	-	35	150	-	24	-	-
Enterococcus	Dry-Summer		11	255	-	24	-	-	5	1	-	24	-	-	1	1	-	24	-	-	88	6200	-	24	-	-
Enterococcus	Dry-Winter		26	29	-	-	-	-	7	5	9	-	-	-	1	1	1	-	-	-	160	260	2200	-	-	-
Enterococcus	Wet		136	209	-	24	-	-	46	74	24	-	-	-	1	7	24	-	-	-	660	740	24	-	-	-
Total Coliform	Dry-Summer	SMB 7-8	53	23	12	47	461	46	9	4	6.5	10	18	12	1	1	1	1	1	1	1200	200	73	200	8800	600
Total Coliform	Dry-Winter		23	60	11	1210	103	98	16	12	8	35	14	27	1	1	1	1	1	1	120	600	36	13000	1000	410
Total Coliform	Wet		73	126	59	230	96	193	55	82	36	116	55	28	1	18	1	1	3	8	200	290	200	1200	200	690
Fecal Coliform	Dry-Summer		4.8	3.1	1.8	5.1	35	6.6	1	1	1	1	4	1	1	1	1	1	1	1	30	27	5	33	660	74
Fecal Coliform	Dry-Winter		6.8	16	1.8	2.4	3.0	2.8	4	1	1	1	2	1	1	1	1	1	1	1	20	170	4	8	8	15
Fecal Coliform	Wet		4.6	17	6.9	25	14	10	5	11	3	4.5	4	3	1	4	1	1	1	1	9	46	36	200	100	50

Attachment A

Analyte	Event Type	Station	Average (MPN/100ml)					Median (MPN/100ml)					Min (MPN/100ml)					Max (MPN/100ml)								
			2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Enterococcus	Dry-Summer		5.0	5.2	2.9	6.7	33	2.0	1	1	1	1	1	1	1	1	1	1	1	1	44	62	19	97	780	19
Enterococcus	Dry-Winter		7.9	38	4.0	21	3.3	2.2	3	4	1	3	1	1	1	1	1	1	1	1	54	540	17	180	13	11
Enterococcus	Wet		23	44	20	117	35	11	9.5	31	8	12	5.5	1.5	1	4	1	1	1	1	70	120	100	1100	280	49
Total Coliform	Dry-Summer	SMB 7-9	49	17	18	24	35	12	12	10	8	16	18	6	1	1	1	1	3	1	480	100	180	130	320	47
Total Coliform	Dry-Winter		28	46	26	252	16	12	18	20	13	31	5	5	1	1	1	1	3	1	130	200	180	1800	85	56
Total Coliform	Wet		142	82	1066	595	105	38	36	38	40	46	19	14	4	20	4	1	16	4	900	220	12000	3400	700	140
Fecal Coliform	Dry-Summer		36	6	7.5	14	18	5.7	7	3.5	4	8	7.5	3	1	1	1	1	1	1	500	26	55	66	200	33
Fecal Coliform	Dry-Winter		26	23	12	85	14	7.2	17	11	3	7	5	4	1	1	1	1	1	1	160	130	100	640	93	40
Fecal Coliform	Wet		43	13	14	61	18	6.4	19	17	5	21	15	4	1	5	1	1	2	1	700	46	180	1500	110	23
Enterococcus	Dry-Summer		7.6	8.1	6.6	36	3.6	3.1	3	3	3	2	2	1	1	1	1	1	1	1	51	60	42	820	21	23
Enterococcus	Dry-Winter		12	35	16.8	48.2	3.7	3.5	5	17	2	5	4	1	1	1	1	1	1	1	44	320	160	400	9	23
Enterococcus	Wet		387	25	112.2	91.2	10.4	5.8	45	12	10	14	7	1	1	5	1	1	1	1	2800	82	1100	820	34	29

Attachment B

Legal Documentation of Authority



COUNTY OF LOS ANGELES
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JOHN F. KRATTLI
County Counsel

December 16, 2013

Mr. Samuel Unger, P.E., Executive Officer
California Regional Water Quality Control Board – Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013-2343

Attention: Mr. Ivar Ridgeway

**Re: Certification By Legal Counsel For Los Angeles County Flood
Control District's Annual Report**

Dear Mr. Unger:

Pursuant to the requirements of Part VI(A)(2)(b) of Order No. R4-2012-0175 (the "Order"), the Office of the County Counsel of the County of Los Angeles makes the following certification in support of the Annual Report of the Los Angeles County Flood Control District ("LACFCD"):

Certification Pursuant To Order Part VI(A)(2)(b)

"Each Permittee must submit a statement certified by its chief legal counsel that the Permittee has the legal authority within its jurisdiction to implement and enforce the requirements contained in 40 CFR §122.26(d)(2)(i)(A-F) and this Order."

LACFCD has the legal authority within its jurisdiction to implement and enforce each of the requirements contained in 40 CFR §122.26(d)(2)(i)(A-F) and the Order.

Order Part VI(A)(2)(b)(i)

"Citation of applicable municipal ordinances or other appropriate legal authorities and their relationship to the requirements of 40 CFR §122.26(d)(2)(i)(A-F) and this Order"

Citations Of Applicable Ordinances Or Other Legal Authorities

Although many portions of State law, the Charter of the County of Los Angeles, the Los Angeles County Code and LACFCD's Flood Control District Code ("Code") are potentially applicable to the implementation and enforcement of these requirements, the primary applicable laws and ordinances are as follows:

Los Angeles County Code, Title 12, Chapter 12.80 STORMWATER AND RUNOFF POLLUTION CONTROL, including:

§12.80.010 - §12.80.360 Definitions

§12.80.370 Short title.

§12.80.380 Purpose and intent.

§12.80.390 Applicability of this chapter.

§12.80.400 Standards, guidelines and criteria.

§12.80.410 Illicit discharges prohibited.

§12.80.420 Installation or use of illicit connections prohibited.

§12.80.430 Removal of illicit connection from the storm drain system.

§12.80.440 Littering and other discharge of polluting or damaging substances prohibited.

§12.80.450 Stormwater and runoff pollution mitigation for construction activity.

§12.80.460 Prohibited discharges from industrial or commercial activity.

§12.80.470 Industrial/commercial facility sources required to obtain a NPDES permit.

§12.80.480 Public facility sources required to obtain a NPDES permit.

§12.80.490 Notification of uncontrolled discharges required.

§12.80.500 Good housekeeping provisions.

§12.80.510 Best management practices for construction activity.

- §12.80.520 Best management practices for industrial and commercial facilities.
- §12.80.530 Installation of structural BMPs.
- §12.80.540 BMPs to be consistent with environmental goals.
- §12.80.550 Enforcement—Director's powers and duties.
- §12.80.560 Identification for inspectors and maintenance personnel.
- §12.80.570 Obstructing access to facilities prohibited.
- §12.80.580 Inspection to ascertain compliance—Access required.
- §12.80.590 Interference with inspector prohibited.
- §12.80.600 Notice to correct violations—Director may take action.
- §12.80.610 Violation a public nuisance.
- §12.80.620 Nuisance abatement—Director to perform work when—Costs.
- §12.80.630 Violation—Penalty.
- §12.80.635 Administrative fines.
- §12.80.640 Penalties not exclusive.
- §12.80.650 Conflicts with other code sections.
- §12.80.660 Severability.
- §12.80.700 Purpose.
- §12.80.710 Applicability.
- §12.80.720 Registration required.
- §12.80.730 Exempt facilities.
- §12.80.740 Certificate of inspection—Issuance by the director.
- §12.80.750 Certificate of inspection—Suspension or revocation.

§12.80.760 Certificate of inspection—Termination.

§12.80.770 Service fees.

§12.80.780 Fee schedule.

§12.80.790 Credit for overlapping inspection programs.

§12.80.800 Annual review of fees.

Los Angeles County Code, Title 12, Chapter 12.84 LOW IMPACT DEVELOPMENT STANDARDS, including:

§12.84.410 Purpose.

§12.84.420 Definitions.

§12.84.430 Applicability.

§12.84.440 Low Impact Development Standards.

§12.84.445 Hydromodification Control.

§12.84.450 LID Plan Review.

§12.84.460 Additional Requirements.

Los Angeles County Code, Title 22 PLANNING AND ZONING, Part 6 ENFORCEMENT PROCEDURES, including:

§22.60.330 General prohibitions.

§22.60.340 Violations.

§22.60.350 Public nuisance.

§22.60.360 Infractions.

§22.60.370 Injunction.

§22.60.380 Enforcement.

§22.60.390 Zoning enforcement order and noncompliance fee.

Los Angeles County Code, Title 26 BUILDING CODE, including:

§26.103 Violations And Penalties

§26.104 Organization And Enforcement

§26.105 Appeals Boards

§26.106 Permits

§26.107 Fees

§26.108 Inspections

LACFCD Code Chapter 21 - STORMWATER AND RUNOFF
POLLUTION CONTROL including:

§21.01 Purpose and Intent

§21.03 Definitions

§21.05 Standards, Guidelines, and Criteria

§21.07 Prohibited Discharges

§21.09 Installation or Use of Illicit Connections Prohibited

§21.11 Littering Prohibited

§21.13 Evidence of Compliance With Permit Requirements for Industrial
or Commercial Activity

§21.15 Notification of Uncontrolled Discharges Required

§21.17 Requirement to Monitor and Analyze

§21.19 Conflicts With Other Code Sections

§21.21 Severability

§21.23 Violation a Public Nuisance

California Government Code §6502

California Government Code §23004

California Water Code §8100 *et. seq.*

Relationship Of Applicable Ordinances Or Other Legal Authorities To
 The Requirements of 40 CFR §122.26(d)(2)(i)(A-F) And The Order

Although, depending upon the particular issue, there may be multiple ways in which particular sections of the County of Los Angeles' ordinances, LACFCD's ordinances, and statutes relate to the requirements contained in 40 CFR §122.26(d)(2)(i)(A-F) and the Order, the table below indicates the basic relationship with Part VI(A)(2)(a) of the Order:

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
<p>i. Control the contribution of pollutants to its MS4 from storm water discharges associated with industrial and construction activity and control the quality of storm water discharged from industrial and construction sites. This requirement applies both to industrial and construction sites with coverage under an NPDES permit, as well as to those sites that do not have coverage under an NPDES permit.</p>	<p>Los Angeles County Code: §12.80.410 [illicit discharge prohibited]; §12.80.450 [construction] §12.80.460 [industrial and commercial] §12.80.470 and .480 [industrial and commercial NPDES requirements] §12.84.440 [LID standards] §12.84.445 [hydromodification control] §12.84.450 [LID Plan Review] §22.60.330 [general prohibitions] §22.60.340 [violations] §22.60.350 [public nuisance] §22.60.360 [infractions] §22.60.370 [injunction] §22.60.380 [enforcement.] §22.60.390 [zoning enforcement order] §26.103 [violations and penalties]</p>

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
	§26.104 [enforcement] §26.106 [permits] §26.108 [inspections] LACFCD Code: §21.05 Standards, Guidelines, and Criteria §21.07 Prohibited Discharges §21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity §21.15 Notification of Uncontrolled Discharges Required §21.17 Requirement to Monitor and Analyze §21.23 Violation a Public Nuisance
ii. Prohibit all non-storm water discharges through the MS4 to receiving waters not otherwise authorized or conditionally exempt pursuant to Part III.A.	Los Angeles County Code: §12.80.410 [illicit discharge prohibited] LACFCD Code: §21.07 Prohibited Discharges
iii. Prohibit and eliminate illicit discharges and illicit connections to the MS4.	Los Angeles County Code: §12.80.410 [illicit discharge prohibited]; §12.80.420 [illicit connections prohibited] LACFCD Code: §21.05 Standards, Guidelines, and Criteria §21.07 Prohibited Discharges §21.09 Installation or Use of Illicit Connections Prohibited §21.23 Violation a Public Nuisance

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
<p>iv. Control the discharge of spills, dumping, or disposal of materials other than storm water to its MS4.</p>	<p>Los Angeles County Code: §12.80.410 [illicit discharge prohibited]; §12.80.440 [littering and other polluting prohibited]</p> <p>LACFCD Code: §19.07 Interference With or Placing Obstructions, Refuse, Contaminating Substances, or Invasive Species in Facilities Prohibited §21.05 Standards, Guidelines, and Criteria §21.07 Prohibited Discharges §21.09 Installation or Use of Illicit Connections Prohibited §21.11 Littering Prohibited §21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity §21.15 Notification of Uncontrolled Discharges Required §21.17 Requirement to Monitor and Analyze §21.23 Violation a Public Nuisance</p>
<p>v. Require compliance with conditions in Permittee ordinances, permits, contracts or orders (i.e., hold dischargers to its MS4 accountable for their contributions of pollutants and flows).</p>	<p>Los Angeles County Code: §12.80.490 [notification of uncontrolled discharge] §12.80.570 [obstructing access to facilities] §12.80.580 [compliance inspection] §12.80.610 [violation a nuisance] §12.620 [nuisance abatement] §12.80.635 [violation penalty]</p>

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
	<p>§12.80.640 [penalties not exclusive] §12.84.440 [LID standards] §12.84.445 [hydromodification control] §12.84.450 [LID Plan Review] §22.60.330 [general prohibitions] §22.60.340 [violations] §22.60.350 [public nuisance] §22.60.360 [infractions] §22.60.370 [injunction] §22.60.380 [enforcement.] §22.60.390 [zoning enforcement order] §26.103 [violations and penalties] §26.104 [enforcement] §26.106 [permits] §26.108 [inspections] LACFCD Code: §19.11 Violation a Public Nuisance §21.05 Standards, Guidelines, and Criteria §21.07 Prohibited Discharges §21.09 Installation or Use of Illicit Connections Prohibited §21.11 Littering Prohibited §21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity §21.15 Notification of Uncontrolled Discharges Required §21.17 Requirement to Monitor and Analyze</p>

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
	§21.19 Conflicts With Other Code Sections §21.23 Violation a Public Nuisance
vi. Utilize enforcement mechanisms to require compliance with applicable ordinances, permits, contracts, or orders.	Same as item v., above
vii. Control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements among Copermittees.	California Government Code §6502 California Government Code §23004
viii. Control of the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other owners of the MS4 such as the State of California Department of Transportation.	California Government Code §6502 California Government Code §23004
ix. Carry out all inspections, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with applicable municipal ordinances, permits, contracts and orders, and with the provisions of this Order, including the prohibition of non-storm water discharges into the MS4 and receiving waters. This means the Permittee must have authority to enter, monitor, inspect, take measurements, review and copy records, and require regular reports from entities discharging into its MS4.	Los Angeles County Code: §12.80.490 [notification of uncontrolled discharge] §12.80.570 [obstructing access to facilities] §12.80.580 [compliance inspection] §12.80.610 [violation a nuisance] §12.80.620 [nuisance abatement] §12.80.635 [violation penalty] §12.80.640 [penalties not exclusive] §22.60.380 [enforcement.] §26.106 [permits] §26.108 [inspections]

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
	LACFCD Code: §21.05 Standards, Guidelines, and Criteria §21.07 Prohibited Discharges §21.09 Installation or Use of Illicit Connections Prohibited §21.11 Littering Prohibited §21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity §21.15 Notification of Uncontrolled Discharges Required §21.17 Requirement to Monitor and Analyze §21.23 Violation a Public Nuisance
x. Require the use of control measures to prevent or reduce the discharge of pollutants to achieve water quality standards/receiving water limitations.	Los Angeles County Code: §12.80.450 [construction mitigation] §12.80.500 [good housekeeping practices] §12.80.510 [construction BMPs] §12.80.520 [industrial/commercial BMPs] §12.84.440 [LID standards] §12.84.450 [LID Plan Review] §22.60.330 [general prohibitions] §22.60.380 [enforcement.] §22.60.390 [zoning enforcement order] §26.106 [permits] §26.108 [inspections] LACFCD Code: §21.05 Standards, Guidelines, and Criteria

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
	§21.07 Prohibited Discharges §21.09 Installation or Use of Illicit Connections Prohibited §21.11 Littering Prohibited §21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity §21.15 Notification of Uncontrolled Discharges Required §21.17 Requirement to Monitor and Analyze §21.23 Violation a Public Nuisance
xi. Require that structural BMPs are properly operated and maintained.	Los Angeles County Code: §12.80.530 [installation of structural BMPs] §22.60.380 [enforcement.] §22.60.390 [zoning enforcement order] §26.106 [permits] §26.108 [inspections] LACFCD Code: §21.05 Standards, Guidelines, and Criteria §21.07 Prohibited Discharges §21.09 Installation or Use of Illicit Connections Prohibited §21.11 Littering Prohibited §21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity §21.15 Notification of Uncontrolled Discharges Required §21.17 Requirement to Monitor and Analyze

Order Part VI(A)(2)(a) Items	Primary Applicable Ordinance/Statute
	§21.23 Violation a Public Nuisance
xii. Require documentation on the operation and maintenance of structural BMPs and their effectiveness in reducing the discharge of pollutants to the MS4.	Los Angeles County Code: §12.80.530 [installation of structural BMPs] §22.60.380 [enforcement.] §22.60.390 [zoning enforcement order] §26.106 [permits] §26.108 [inspections] LACFCD Code: §21.05 Standards, Guidelines, and Criteria §21.07 Prohibited Discharges §21.09 Installation or Use of Illicit Connections Prohibited §21.11 Littering Prohibited §21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity §21.15 Notification of Uncontrolled Discharges Required §21.17 Requirement to Monitor and Analyze §21.23 Violation a Public Nuisance

Order Part VI(A)(2)(b)(ii)

"Identification of the local administrative and legal procedures available to mandate compliance with applicable municipal ordinances identified in subsection (i) above and therefore with the conditions of this Order, and a statement as to whether enforcement actions can be completed administratively or whether they must be commenced and completed in the judicial system."

The local administrative and legal procedures available to mandate compliance with the above ordinances are specified in those ordinances, particularly in:

Los Angeles County Code:

§12.80.550 Enforcement—Director's powers and duties.

§12.80.600 Notice to correct violations—Director may take action.

§12.80.610 Violation a public nuisance.

§12.80.620 Nuisance abatement—Director to perform work when—Costs.

§12.80.630 Violation—Penalty.

§12.80.635 Administrative fines.

§12.80.640 Penalties not exclusive.

§12.84.450 LID Plan Review.

§12.84.460 Additional Requirements.

Title 26, §103 Violations And Penalties

Title 26, §104 Organization And Enforcement

Title 26, §105 Appeals Boards

Title 26, §106 Permits

§22.60.330 General prohibitions.

§22.60.340 Violations.

§22.60.350 Public nuisance.

§22.60.360 Infractions.

§22.60.370 Injunction.

§22.60.380 Enforcement.

§22.60.390 Zoning enforcement order and noncompliance fee.

LACFCD Code:

§21.05 Standards, Guidelines, and Criteria

§21.07 Prohibited Discharges

§21.09 Installation or Use of Illicit Connections Prohibited

§21.11 Littering Prohibited

§21.13 Evidence of Compliance With Permit Requirements for Industrial or Commercial Activity

§21.15 Notification of Uncontrolled Discharges Required


§21.17 Requirement to Monitor and Analyze

§21.23 Violation a Public Nuisance

LACFCD attempts to first resolve each enforcement action administratively. However, the above cited ordinances also provide LACFCD with the authority to pursue such actions in the judicial system as necessary.

Very truly yours,

JOHN F. KRATTLI
County Counsel

By 
JUDITH A. FRIES
Principal Deputy County Counsel
Public Works Division

JAF:jjj

CITY OF LOS ANGELES

CALIFORNIA



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January 22, 2015

Mr. Sam Unger, Executive Officer
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Attention Mr. Ivar Ridgeway

Dear Mr. Unger:

CERTIFICATION BY LEGAL COUNSEL FOR THE CITY OF LOS ANGELES CONFIRMING LEGAL AUTHORITY TO IMPLEMENT THE PROVISIONS OF THE MUNICIPAL STORMWATER PERMIT

I write pursuant to Part VI(A)(2)(b) of Order No. R4-2012-0175, otherwise known as the Municipal Separate Stormwater Sewer System (MS4) Permit (the "Order"). Part VI(A)(2)(b) of the Permit provides:

"Each Permittee must submit a statement certified by its chief legal counsel that the Permittee has the legal authority within its jurisdiction to implement and enforce the requirements contained in 40 CFR §122.26(d) (2) (i) (AF) and this Order."

The Office of the City Attorney of the City of Los Angeles (City), serving as its legal counsel, certifies that the City has the legal authority within its jurisdiction to implement and enforce the requirements contained in 40 CFR §122.26(d)(2)(i)(A-F) and of the Order. This correspondence addresses all legal authority requirements as listed in the Order. Subsequently, annual certification by our office will be included in the Stormwater Annual Report as required by the Order.

Order Part VI(A)(2)(b)(i) - "Citation of applicable municipal ordinances or other appropriate legal authorities and their relationship to the requirements of 40 CFR §122.26(d) (2) (i) (A-F) and this Order"

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Below is a list of applicable Los Angeles Municipal Code (LAMC) provisions that provide the requisite legal authorities:

- LAMC 64.70 General Provisions.
- LAMC 64.70.01 Definitions and Abbreviations.
- LAMC 64.70.02 Pollutant Discharge Control.
- LAMC 64.70.03 Elimination of Illicit Discharges and Illicit Connections.
- LAMC 64.70.05 Authority to Inspect.
- LAMC 64.70.06 Authority to Arrest and Issue Citations.
- LAMC 64.70.07 Enforcement.
- LAMC 64.70.08 Remedies Not Exclusive.
- LAMC 64.70.09 Liability for Costs of Correction Arising from Unlawful Discharge.
- LAMC 64.70.10 Disposition of Money Collected.
- LAMC 64.70.11 Stormwater and Urban Runoff Pollution Education.
- LAMC 64.70.12 Construction and Application.
- LAMC 64.70.13 Severability.
- LAMC 64.72 Stormwater Pollution Control Measures for Development Planning and Construction Activities.
- LAMC 64.72.01 Authority of the Board of Public Works.
- LAMC 64.72.02 Funds Collected from Waiver.
- LAMC 64.72.03 Supplemental Provisions.
- LAMC 64.72.04 Authority to Inspect and Enforce Stormwater Pollution Control Measures.
- LAMC 64.72.05 LID Plan Check Fees.

In addition, statewide regulations provide further legal authorities with respect to intergovernmental authorities, specifically:

California Government Code §6502
California Government Code §23004

Relationship of Applicable Ordinances and Other Legal Authorities to the Requirements of 40CFR §122.26(d)(2)(i)(a-F) and the Order

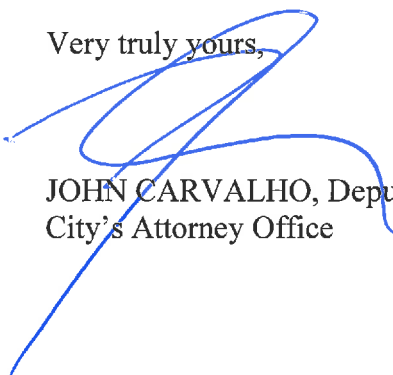
The table below indicates the basic relationship between the “Legal Authority” requirements listed in Section VI(A)(2)(b) of the Order and the existing legal statutes that provide this legal authority.

Legal Authority Required by Permit	City/State Legal Provisions
VI.A.2.i. Control the contribution of pollutants to its MS4 from storm water discharges associated with industrial and construction activity and control the quality of storm water discharged from industrial and construction sites. This requirement applies both to industrial and construction sites with coverage under an NPDES permit, as well as to those sites that do not have coverage under an NPDES permit.	LAMC 64.70.02.B LAMC 64.70.02.C.1.a LAMC 64.70.02.D LAMC 64.70.03.A
ii. Prohibit all non-storm water discharges through the MS4 to receiving waters not otherwise authorized or conditionally exempt pursuant to Part III.A	LAMC 64.70.03.A
iii. Prohibit and eliminate illicit discharges and illicit connections to the MS4	LAMC 64.70.03.A LAMC 64.70.03.B
iv. Control the discharge of spills, dumping, or disposal of materials other than storm water to its MS4	LAMC 64.70.03.A
v. Require compliance with conditions in Permittee ordinances, permits, contracts or orders (i.e., hold dischargers to its MS4 accountable for their contributions of pollutants and flows)	LAMC 64.70.03.A LAMC 64.70.07
vi. Utilize enforcement mechanisms to require compliance with applicable ordinances, permits, contracts, or orders	LAMC 64.70.05.B.4 LAMC 64.70.05.B.6
vii. Control the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements among Co-permittees	California Government Code §6502 California Government Code §23004
viii. Control of the contribution of pollutants from one portion of the shared MS4 to another portion of the MS4 through interagency agreements with other owners of the MS4 such as the State of California Department of Transportation	California Government Code §6502 California Government Code §23004

<p>ix. Carry out all inspections, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with applicable municipal ordinances, permits, contracts and orders, and with the provisions of this Order, including the prohibition of non-storm water discharges into the MS4 and receiving waters. This means the Permittee must have authority to enter, monitor, inspect, take measurements, review and copy records, and require regular reports from entities discharging into its MS4</p>	<p>LAMC 64.70.05.A LAMC 64.70.05.B LAMC 64.72.04.B</p>
<p>x. Require the use of control measures to prevent or reduce the discharge of pollutants to achieve water quality standards/receiving water limitations</p>	<p>LAMC 64.70.02.D</p>
<p>xi. Require that structural BMPs are properly operated and maintained</p>	<p>LAMC 64.70.02.D</p>
<p>xii. Require documentation on the operation and maintenance of structural BMPs and their effectiveness in reducing the discharge of pollutants to the MS4</p>	<p>LAMC 64.70.05.B.3</p>
<p>VI.A.b.ii. Identification of the local administrative and legal procedures available to mandate compliance with applicable municipal ordinances identified in subsection (i) above and therefore with the conditions of this Order, and a statement as to whether enforcement actions can be completed administratively or whether they must be commenced and completed in the judicial system.</p>	<p>The local administrative and legal procedures available to mandate compliance with the above LAMC provisions are specified in the provisions themselves with key enforcement provisions being LAMC 64.70.06 and LAMC 64.70.07</p>

The City is in the process of updating the LAMC with respect to its stormwater regulations. These changes will be reported with the 2014-2015 annual report.

Very truly yours,



JOHN CARVALHO, Deputy City Attorney
 City's Attorney Office