



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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December 24, 2012

IN REPLY PLEASE

REFER TO FILE:

WM-7

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

Attention Renee Purdy

Dear Mr. Unger:

### **REQUEST FOR TIME SCHEDULE ORDER**

### **MARINA DEL REY HARBOR MOTHER'S BEACH AND BACK BASINS BACTERIA TOTAL MAXIMUM DAILY LOAD (RESOLUTION NO. 2006-009) – SUMMER AND WINTER DRY-WEATHER CONDITIONS**

### **WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE COASTAL WATERSHED OF LOS ANGELES COUNTY (ORDER NO. R4-2012-0175, NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT NO. CAS004001)**

The recently adopted Municipal Separate Storm Sewer System (MS4) Permit for discharges within the coastal watersheds of Los Angeles County (Order No. R4-2012-0175) includes water quality based effluent limits designed to achieve the waste load allocations set forth in the Marina Del Rey Harbor Mother's Beach and Back Basins Bacteria Total Maximum Daily Load (TMDL) (Resolution No. 2006-009) for summer and winter dry weather. Since March 12, 2007, in conjunction with other responsible parties under the subject TMDL, the County of Los Angeles (County) has been monitoring water quality in the Marina del Rey Harbor pursuant to the Marina del Rey Harbor Mother's Beach and Back Basins Bacteria TMDL Coordinated Monitoring Plan (CMP). Results from this monitoring have been forwarded to your staff.

At times, the monitoring results have shown indicator bacteria exceedances in receiving waters during wet and dry weather. These exceedances may be attributable to the natural environment or various anthropogenic sources. The data does not identify the source of bacteria that is causing these exceedances. We have no evidence that any discharge from the County's or the Los Angeles County Flood Control District's (LACFCD) MS4 caused or contributed to these exceedances.

We do not know whether there will be exceedances of bacteria indicators at the TMDL CMP monitoring stations during the term of the new MS4 Permit. However, because exceedances of indicator bacteria in the receiving waters have existed in the past, the County and the LACFCD are planning to implement structural Best Management Practices (BMPs) to improve water quality in the harbor. The County and LACFCD may request that their efforts be reflected in a Time Schedule Order (TSO) under the MS4 Permit. Accordingly, we are hereby submitting this request in order to discuss implementing procedures to facilitate the projects based upon the past exceedances experienced in the watershed. The County and LACFCD request that any TSO or regulatory response reflect an approach consistent with this request.

## **Background**

### Monitoring

On February 1, 2007, the Regional Board approved the Marina del Rey Harbor Mother's Beach and Back Basins Bacteria TMDL CMP submitted on behalf of the responsible agencies. The County and other responsible agencies have been monitoring flows at nine monitoring locations for Total Coliform, Fecal Coliform, Enterococcus, and Escherichia coli (E. coli) as applicable at each monitoring site. All of the monitoring stations are located in the receiving waters, as required by the TMDL. In accordance with the TMDL CMP, weekly reports with the monitoring results have been submitted to your agency. Additional copies of the report can be provided if they are needed to demonstrate the quality of the receiving waters in terms of bacteria levels.

### Structural and Source Controls

Since the effective date of the TMDL, the County and the LACFCD have been involved in various efforts in the Marina del Rey Watershed that relate to the subject TMDL. Those efforts are listed below:

The County has:

- Completed the Marina del Rey Small Drain Survey
- Adopted a countywide Low-Impact Development Ordinance
- Completed the Mother's Beach and Back Basins Bacteria TMDL Non-Point Source Study
- Implemented elements of the Storm Water Management Program
- Performed industrial facility inspections
- Installed a mechanical circulation device at Mother's Beach
- Increased street and parking lot sweeping frequency and
- Relined and repaired sewer lines

The LACFCD has

- Installed the Oxford Basin, Washington Boulevard, and Boone Olive Pump Plant Low-Flow Diversions
- Installed five Filterra catch basin inserts along Abbot Kinney Boulevard and
- Begun design of the Oxford Retention Basin Multiuse Enhancement Project

Despite these extensive efforts, exceedances in the receiving water persist. The County and Flood Control District are planning to implement more BMPs in order to improve water quality in the Marina Del Rey Harbor.

### **Analysis**

Results from the Mother's Beach and Back Basins Bacteria TMDL Non-Point Source Study indicated that:

- Lack of circulation in the Back Basins was identified as a main contributing factor to bacteria;
- Q-PCR analysis showed little human contamination throughout the Back Basins as human sources were found to contribute only 3 percent of the bacteria load for both wet and dry weather;
- Birds were significant contributors of bacteria;
- Sanitary sewer systems were determined to have structural defects, (which has since been remedied); and
- Resuspension of sediment from Mother's Beach was not a significant contributor to bacteria in the water.

Lab analysis of the water samples taken from monitoring sites have frequently found exceedances of the bacteria limits established by the TMDL. Because the monitoring sites are located in receiving water bodies that receive inflows from both MS4 Permit discharges and nonpoint sources, as well as impacts from birds and other natural sources, it is not possible to identify which source, if any, is causing or contributing to observed bacteria exceedances. As previously stated, high bacteria levels may be due to natural sources. As stated in the TMDL, "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." Therefore, it is possible that exceedances are not directly attributable to an agency's MS4 discharges.

**Proposed Actions**

As a follow up to the non-point source study; we will continue to periodically monitor dry weather flows in the Marina del Rey Harbor.

The LACFCD and the County are in the process of implementing structural BMPs to improve the water quality in the harbor. The LACFCD plans to construct the Oxford Retention Basin Multiuse Enhancement Project, which will address water-quality deficiencies by excavating the accumulated sediment along the bottom of the basin and constructing a berm between the existing tide gates, which will improve circulation in the basin and improve water quality. The County plans to construct structural BMPs at five County parking lot locations and at a County library facility to divert and treat runoff that would normally discharge directly to the harbor.

The following proposed schedule is based on our experience. The duration of each action is as short as deemed possible:

<b>Action</b>	<b>Responsible Party</b>	<b>Estimated Completion Date</b>
Parking Lots 5 and 7 BMP Project	County	May 2015
Oxford Basin Multiuse Enhancement Project	LACFCD	December 2015
Parking Lots 9,10, 11 and Library BMP Projects	County	2017

The County and the LACFCD expect water quality to be improved with the implementation of these projects and share the Regional Board's commitment to water quality and look forward to working with you and your staff on the development of an approach that will help address the subject TMDL.

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If you have any questions regarding this request, please contact me at (626) 458-4300 or ghildeb@dpw.lacounty.gov or Ms. Terri Grant at (626) 458-4309 or tgrant@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER  
Director of Public Works

A handwritten signature in black ink that reads "Gary Hildebrand". The signature is written in a cursive, flowing style.

GARY HILDEBRAND  
Assistant Deputy Director  
Watershed Management Division

TM:cp

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cc: Chief Executive Office  
County of Los Angeles Department of Beaches and Harbors  
City of Culver City  
City of Los Angeles  
California Department of Transportation