

Table 1. Draft General Framework for Dry Weather LA River Bacteria TMDL Implementation – 1/28/09 FOR DISCUSSION ONLY

The following table is a DRAFT general framework developed by the CREST consultant team to implement the LA River Bacteria TMDL. The actions are intended to capture concepts proposed by various stakeholders during the First Right Steps Workshop held on Monday November 24th, 2008. The general framework has not been agreed upon by any potentially responsible entities, but rather it is intended to support early discussions of an overall implementation strategy. Note that no timeline is associated with the Phases of implementation as the time to complete and costs to implement the actions within each Phase will ultimately dictate the time necessary to complete a Phase.

Phase	Systemwide Actions	Mainstem LA River Actions During Dry Weather	Tributary Actions During Dry Weather	Special Studies and Potential TMDL Revisions and Basin Plan Amendments (May be result of either MS4 and/or RWQCB actions)
Phase I	<ol style="list-style-type: none"> Continue and potentially enhance ID/IC programs, outreach, source control, and runoff reduction efforts Review and if necessary revise ordinances to support above efforts and to reduce impacts from wastewater infrastructure 	<ol style="list-style-type: none"> Reduce loading from Reach A priority drains identified utilizing a Weight of Evidence (WOE) Approach. Specific reaches will be determined at a later date. Collect data to evaluate compliance with WLAs after actions are taken. Gather discharge data for Reach B to support determination of priority drains. Prioritize Phase II Actions based on new and historic data 	<ol style="list-style-type: none"> Evaluate REC uses in 303(d)-listed tributaries to identify high priority areas (if any) and corresponding compliance points Gather discharge data upstream of high priority (REC use) areas (if any) in 303(d)-listed tributaries to Reach A Prioritize Phase II actions 	<p>Special Studies</p> <p>One or more of the following special studies could be conducted during any Phase of Implementation by Stakeholders (MS4s, RWQCB, USEPA, etc.):</p> <ol style="list-style-type: none"> Investigate uncharacterized sources Investigate water quality impacts from homeless encampments Natural Sources Exclusion Revise REC beneficial uses to reflect existing and/or attainable uses based on access to segments, depth of flow, etc. Conduct Quantitative Microbial Risk Assessment (QMRA) to determine SSOs Other special studies <p>Potential TMDL Revisions and Basin Plan Amendments</p> <p>One or more of the following TMDL or Basin Plan Amendments could occur as appropriate during any Phase of Implementation:</p> <ol style="list-style-type: none"> Results of special studies support revisions to the TMDL (i.e., targets, allocations, uses, etc.) Waterbodies meet targets WLA Attainment New WQ Criteria
Phase II	Continue Phase I actions, evaluate their effectiveness, revise if necessary	<ol style="list-style-type: none"> Additional reduction of Reach A loads to meet Waste Load Allocations (WLAs), if necessary. Reduce loading from Reach B drains identified utilizing a WOE Approach Collect data to evaluate compliance with WLAs in Reaches A and B after actions are taken. Gather discharge data for Reach C Prioritize Phase III Actions based on new data 	<ol style="list-style-type: none"> Reduce Reach A tributary loading Gather discharge data upstream of high priority (REC use) areas (if any) in 303(d)-listed tributaries to Reach B Prioritize Phase III actions 	
Phase III	Continue Phase I actions, evaluate their effectiveness, revise if necessary	<ol style="list-style-type: none"> Additional reduction of Reaches A and B loads to meet WLAs, if necessary Reduce loading from Reach C drains identified utilizing a WOE Approach Collect data to evaluate compliance with WLAs in Reaches A, B, and C after actions are taken. Gather discharge data for Reach D Prioritize Phase IV Actions based on new data 	<ol style="list-style-type: none"> Evaluate WLA for tributary that discharges to Reach A, take further action if necessary Reduce Reach B tributary loading Gather discharge data upstream of high priority (REC use) areas (if any) in 303(d)-listed tributaries to Reach C Prioritize Phase IV actions 	
Phase IV	Continue Phase I actions, evaluate their effectiveness, revise if necessary	<ol style="list-style-type: none"> Additional reduction of Reaches A, B, and C loads to meet WLAs, if necessary Reduce loading from Reach D drains identified utilizing a WOE Approach Compare drain loading to all 303(d)-listed reaches to WLAs Prioritize Phase V Actions based on new data 	<ol style="list-style-type: none"> Evaluate WLA for tributaries that discharge to Reaches A and B, take further action if necessary Reduce Reach C tributary loading Gather discharge data upstream of high priority (REC use) areas (if any) in 303(d)-listed tributaries to Reach D Prioritize Phase V actions 	
Phase V	Continue Phase I actions, evaluate their effectiveness, revise if necessary	<ol style="list-style-type: none"> Compare drain loading from all 303(d)-listed reaches to WLAs Reduce additional load to meet WLAs in all reaches if necessary 	<ol style="list-style-type: none"> Reduce Reach D tributary loading Evaluate WLA for tributaries that discharge to Reach A, B, C, and D, take further action if necessary 	