

**6<sup>th</sup> Annual California Stormwater Quality Association Conference  
November 1-3, 2010  
Rancho Mirage, California**

**Metals TMDL Compliance –  
Making True Source Control the Basis of Long-Term TMDL Compliance**

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**ABSTRACT**

California Regional Water Boards and USEPA have begun adopting total maximum daily loads (TMDLs) for metals. The most common metals addressed are copper, lead, and zinc. One of the first metals TMDLs adopted in California was LA River Metals TMDL, which was first adopted by the LA Regional Water Board on June 2, 2005, and readopted on September 6, 2007 after a legal challenge. It covers an 834-square mile watershed, 56% of which is highly urbanized.

Studies by the Southern California Coastal Water Research Project (SCCWRP) and UCLA demonstrated that the vast majority of copper, lead, and zinc that reaches the LA River and its tributaries is deposited in the watershed by atmospheric deposition and carried to the waterbodies by stormwater. This is estimated by Regional Water Board staff to account for approximately 80% of the copper loading to the River. Municipalities estimate a cost of nearly \$15 billion to purchase the land and construct the sand filters, infiltration trenches, and flow control facilities needed to remove copper in just 40% of the watershed.

Final implementation plans for achieving compliance with the assumptions and requirements of TMDL waste load allocations (WLAs) are due October 11, 2010. Most jurisdictions/jurisdictional groups preparing implementation plans are emphasizing treatment control. However, one small jurisdictional group, Jurisdictional Group 1 (JG1), is emphasizing source control as the only cost-effective way to comply with the TMDLs. JG1 represents eight cities and Caltrans in Reach 1 of the LA River and Compton Creek.

The JG1 Implementation Plan is a performance-based, adaptive management approach for complying with the assumptions and requirements of the WLAs that stresses long-term true source control BMPs as the most effective means of compliance. It also emphasizes the use of additional institutional and operational source control BMPs for pollution prevention, runoff reduction, and sediment control, especially in the near term.

The Los Cerritos Channel (LCC) Metals TMDLs were established by USEPA pursuant to a consent decree. It has no implementation plan. The entities the LCC Watershed, like those in JG1, have decided that the basis for cost-effective compliance with the Metals TMDLs is source control. They will learn from JG1 and implement many similar measures. However, they must first work with the Regional Board to get a TMDL implementation plan adopted for incorporation into the Basin Plan and the re-issued municipal stormwater permits. LCC cities propose a TMDL implementation plan incorporating a water quality attainment strategy that will identify actions to be undertaken by a broad range of public and private sector entities. They also will ask the State and Regional Water Boards to exercise their authorities under California Water Code Sections 13146 and 13247 to require state offices, departments, and boards to comply with State policy and with water quality control plans approved or adopted by the State Water Board.