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May 7, 2012

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

Dear Mr. Unger:

**SUBJECT: LOS ANGELES HARBOR BACTERIA TMDL – INNER CABRILLO
BEACH – COMMENTS ON BACTERIA TMDL REOPENER**

The City of Los Angeles Harbor Department and Bureau of Sanitation would like to thank you for the opportunity to comment on the proposed Basin Plan Amendment for the Los Angeles Region to revise the Total Maximum Daily Loads for Bacteria including Los Angeles Harbor, Inner Cabrillo Beach and Main Ship Channel. This letter is submitted as an informational update on planned measures at Inner Cabrillo Beach.

After working closely with the Los Angeles Regional Water Quality Control Board staff, we are scheduling the following activities for implementation to improve water quality at Cabrillo Beach.

The City intends to implement the following structural measures:

- 1) Expanding the bird exclusion structure into the tidal zone across the beach face (October, 2012) and;
- 2) Designing and implementing a water circulation system, with defined operational parameters (July, 2012 (interim), June, 2013 (refined design)).

It is our view that, with the implementation of these structural control measures, the human related sources have been mitigated to the maximum extent practicable. The City would like to commence the process to obtain a Natural Source Exclusion (NSE) designation for the Inner Cabrillo Beach Bacteria TMDL. These efforts would include risk assessment work, potentially using the Quantitative Microbial Risk Assessment (QMRA) methodology, to identify residual sources of non-human related bacteria and associated health risk. It is our intent that the NSE process culminates in a subsequent

Basin Plan Amendment that acknowledges the control measures and best management practices in place, the physical environmental conditions inherent in the Inner Cabrillo Beach system that limit the efficacy of further structural measures, the natural source character of the remaining bacterial contamination, and modifies the TMDL accordingly.

The City has been working closely with Regional Board staff to develop a work plan with a detailed project scope for the bird exclusion structure extension, interim circulation system implementation, and NSE-related technical work. This workplan, which will be updated as necessary to incorporate new information and strategies, will be submitted to the Regional Board in May 2012.

The City of Los Angeles is committed to resolving the Bacteria TMDL at Cabrillo Beach. We intend to continue our productive interaction with your staff to insure the successful implementation of the aforementioned activities. If you have any questions, please contact us.

Sincerely,



CHRISTOPHER CANNON
Director of Environmental Management
Harbor Department



SHAHRAM KHARAGHANI, Ph.D., P.E., BCEE
Program Manager
Bureau of Sanitation