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November 28, 2018

Deborah Smith, Executive Officer Los Angeles Regional Water Quality Control Board 320 W. 4th Street, Suite 200 Los Angeles, CA 90013

Attention: Renee Purdy / Ivar Ridgeway

Dear Ms. Smith:

REQUEST FOR TIME EXTENSION TO COMPLETE THE IMPLEMENTATION OF LOAD REDUCTION STRATEGIES FOR SEGMENT B OF LOS ANGELES RIVER AND ARROYO SECO

The City of Los Angeles, the City of Pasadena, and the County of Los Angeles are requesting the Los Angeles Water Board a time extension for completing the implementation of the Load Reduction Strategies (LRS) for Los Angeles River Segment B and Arroyo Seco. While several projects have already been completed and are in operation, others are facing unexpected challenges that necessitate this request. The following sections provide an update on the current status of implementation and the proposed steps for completing the LRS projects.

Background

The Los Angeles River Watershed Bacteria Total Maximum Daily Load (Bacteria TMDL) provides the Load Reduction Strategies (LRS) as an optional dry-weather compliance approach. The LRS for Segment B of the Los Angeles River and Arroyo Seco were submitted to your Board on June 25, 2015 and March 23, 2016, respectively. By developing and implementing the optional LRS approach, the Upper Los Angeles River Enhanced Watershed Management Program (ULAR EWMP) Group qualifies for a second phase of Bacteria TMDL implementation, if needed. The LA River Segment B LRS for the ULAR EWMP Group addresses portions of the cities of Los Angeles, Alhambra, South Pasadena, and Monterey Park, unincorporated Los Angeles County, and Los Angeles County Flood Control District. The Arroyo Seco LRS for the ULAR EWMP Group Deborah Smith, Executive Officer Los Angeles Regional Water Quality Control Board November 28, 2018 Page 2 of 5

addresses portions of the cities of Los Angeles, Glendale, Pasadena, La Canada-Flintridge, and South Pasadena, unincorporated Los Angeles County, and Los Angeles County Flood Control District. The LRS for Los Angeles River Segment B and Arroyo Seco specify completion dates of March 2019 and September 2020, respectively.

The LRS process is based on identification of, and implementation actions for, two categories of outfalls:

- Priority Outfalls have relatively consistent, problematic discharges that drive storm drain loading rates above the Wasteload Allocations (WLAs). As such, Priority Outfalls are the highest priority for source abatement and are subject to *specific implementation actions* in the LRS.
- Outlier Outfalls have episodic, high loading-rate *E. coli* discharges that may infrequently drive storm drain *E. coli* loading rates above the WLA. As such, Outlier Outfalls are subject to *follow-up investigations* during LRS implementation.

LA River Segment B LRS Status

For the LA River Segment B LRS, four Priority Outfalls were identified for specific implementation actions: R2-A, R2-K, R2-02, and R2-04. The table below, taken from the submitted LRS document, shows the current status of the projects.

LA River Segment B Priority	y Outfall Analysis: Monte Carlo E. Col	i Loading versus the Final WLA
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Priority Outfall	Proposed LRS Action	Lead Agency	Expected <i>E. Coli</i> Loading Rate from Outfall after Proposed LRS Actions (10 ⁹ MPN per day)	Expected <i>E. Coli</i> Loading Rate from all ULAR EWMP Group outfalls to Segment B after Proposed LRS Actions (10 ⁹ MPN per day)	Status
Baseline Loading Prior to LRS Actions = 929					
R2-A	Low Flow Diversion	Los Angeles	0 (100% removal)	532	Completed
R2-K	Low Flow Diversion	Los Angeles	0 (100% removal)	406	Completed
R2-02	Reuse and Removal Urban Flow System	Los Angeles	0 (100% removal)	313	Design
R2-04	Infiltration Wetland	Uninc. County and LACFCD	0 (100% removal)	274*	Pre-Design

* - Below WLA of 281 billion MPN per day

Deborah Smith, Executive Officer Los Angeles Regional Water Quality Control Board November 28, 2018 Page 3 of 5

To date, the City of Los Angeles has completed two of the three projects (the LFDs at Priority Outfalls R2-A and R2-K) and they are fully operational. One project expanded its scope to create the Ed P. Reyes River Greenway, which transformed a former Brownfield site into a recreational greenspace and ecological resource in an underserved community that lacked any access to open space (see Exhibit A). In addition to setting the standard for diversion projects adjacent to LA River, the Ed P. Reyes Greenway has received two awards of excellence: 1) 2014 Storm Water Solutions "top Project;" and 2) 2015 National Association of Clean Water Agencies (NACWA) Operations and Environmental Performance Award. The City of Los Angeles' third project is at Priority Outfall R2-02 and it recently underwent concept design revisions to address utility conflicts and traffic mitigation issues in the project area. This project currently is in design, and it is anticipated that it will be completed by September 2022 (see Exhibit B).

The County of Los Angeles submitted a project concept for an infiltration wetland to divert dry weather flow from Priority Outfall R2-04. This project is located within the Los Angeles Department of Water and Power's (LADWP) right-of-way. The County of Los Angeles and LADWP have discussed potential collaboration opportunities to expand the project to not only divert and capture dry weather flow, but to also divert and capture wet weather flow. However, soil investigations at the project site indicated lead contamination originating from the Exide facility. Currently, the Department of Toxic Substances Control is cleaning up the contamination and this effort will extend beyond the original LRS deadline of March 23, 2019. As an alternative to the infiltration wetland, the County of Los Angeles proposes to divert dry weather flow into an existing sewer line owned and operated by the Los Angeles County Sanitation Districts (Districts). The County of Los Angeles and the Districts have already determined that there is sufficient capacity in the sewer line to accept the dry weather flow. The County of Los Angeles has recently developed the 30-percent design plans and is working towards the final design plans (see Exhibit C). The County anticipates it will require an additional five years to finalize the design plans and complete the construction of the project at Priority Outfall R2-04.

Arroyo Seco LRS Status

For the Arroyo Seco LRS, four Priority Outfalls were identified for specific implementation items: AS-21+AS-22, AS-15, AS-41, and ARS-234. The table below, taken from the submitted LRS document, shows the current status of the projects.

Priority Outfall	Proposed LRS Action	LRS Lead Action Agency		Expected <i>E. Coli</i> Loading Rate from all ULAR EWMP Group outfalls to Segment B after Proposed LRS Actions (10 ⁹ MPN per day)	Status
	T	Baseline Loading Prior	r to LRS Actions = 61.4		
AS-21 +AS-22	Low Flow Diversion	Los Angeles	0 (100% removal)	42.2	Design
AS-15	Low Flow Diversion	Los Angeles	0 (100% removal)	27.8	Design
AS-41	Diversion to dry well system	Pasadena	0 (100% removal)	17.0	Pre-Design
ARS-234	Diversion to dry well	Uninc. County	0 (100% removal)	12.6*	Pre-Design

Arroyo Seco Priority Outfall Analysis: Monte Carlo E. Coli Loading versus the Final WLA

* - Below WLA of 16.41 billion MPN per day

The City of Los Angeles recently revised the concept reports for the two LFD projects at Priority Outfalls AS-21+AS-22 and AS-15 to address the constraints of the project sites as they are located in a heavily urbanized residential corridor adjacent to the Arroyo Seco. The two projects are anticipated to be completed and operational by December 2022 (see Exhibit B).

The County of Los Angeles submitted a proposal to divert dry weather flows at Priority Outfall ARS-234 into a dry-well at a nearby California Department of Transportation (Caltrans) facility yard. Unfortunately, during feasibility investigations, an existing underground storage tank was identified that cannot be removed. In addition, the construction of a dry-well or other best management practices within the Caltrans facility would greatly disrupt the daily activity of the yard. As an alternative, the County of Los Angeles investigated diverting dry weather flow into dry-wells between the Brookside Golf and Country Club and Rosemont Avenue (see Exhibit D). The County of Los Angeles met with the City of Pasadena at the project site to discuss logistics for soil investigation, timeline, and potential project impacts to the area, and obtained an encroachment permit to perform the soil investigation. Unfortunately, soil engineers discovered a black odorous organic material at the project site, which was determined to be the result of illegal dumping. Therefore, infiltration in this area would require costly environmental investigations and remediation, which was determined to be not feasible. The County of Los Angeles is now investigating a third alternative that includes diversion to an existing sewer line.

The City of Pasadena has been engaged in extensive research to determine the best course of action for Priority Outfall AS-41, which has a large tributary drainage area of 697 acres that includes the Annandale Golf Course, Johnston Lake, and San Rafael Creek. They have performed source investigations, televised various storm drains for illicit connections, performed additional water

Deborah Smith, Executive Officer Los Angeles Regional Water Quality Control Board November 28, 2018 Page 5 of 5

quality monitoring, and conducted soil/percolation tests at Lower Arroyo Park (see Exhibit E). The City of Pasadena is constrained by a high water table at the termination point, reducing infiltration possibilities. Opportunities to divert the flow to the sewer system are limited due to the outfall's location near a creek and distant from the nearest sewer mains. Additionally, the outfall area itself is in a multi-jurisdictional area (Pasadena, South Pasadena, Los Angeles, and LACFCD), which will require extensive outreach with multiple community organizations and various stakeholders. The City of Pasadena anticipates it will require a minimum of five years to identify the most effective design, as well as to investigate grant and funding opportunities to provide a source of revenue.

Request

As demonstrated in the previous sections, the City of Los Angeles, the City of Pasadena, and the County of Los Angeles have made significant progress in fulfilling their commitments to abating flows from the Priority Outfalls in Los Angeles River Segment B and Arroyo Seco. However, despite our best efforts, it has become apparent that not all projects will be completed and operational by the required deadline as stated in the LRS submitted to the Los Angeles Water Board (March 2019 and September 2020 for Segment B and Arroyo Seco, respectively.)

Therefore, the City of Los Angeles, the City of Pasadena, and the County of Los Angeles respectfully request that the Los Angeles Water Board consider a five year time extension to allow us to complete the projects at Priority Outfalls R2-02, AS-21+AS22, AS-15, AS-41, and ARS-234. As explained in previous sections, this extension is necessary to address unforeseen contamination issues, explore alternative designs, conduct public and stakeholder outreach, mitigate road and traffic issues, and address other site constraints that have been identified during the design of these projects. The additional 5-year period will also allow us to investigate grant and funding opportunities to support the development and construction of the projects.

If you have any questions about this request or wish to discuss this further, please contact me at (213) 485-0587 or <u>Shahram.Kharaghani@lacity.org</u> or your staff may contact Alfredo Magallanes at (213) 485-3958 or <u>Alfredo.Magallanes@lacity.org</u>.

Sincerely,

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SHAHRAM KHARAGHANI, PHD, PE, BCEE Program Manager

SK:AM:am WPDCR9461

Attachment

cc: Barry Berggren, City of Los Angeles, LASAN Alfredo Magallanes, City of Los Angeles, LASAN Paul Alva, Los Angeles County Mark Lombos, Los Angeles County Kris Markanian, City of Pasadena Sean Singletary, City of Pasadena

EXHIBIT A

Arroyo Seco Load Reduction Strategy Ed P. Reyes River Greenway Fact Sheet Green infrastructure relies on the power of sunlight, and the organisms in soils and on plant roots to treat pollutants in stormwater runoff. Because it is economical and provides recreational and habitat benefits, it is the City's preferred approach to maintain healthy waters and to support sustainable communities. Unlike traditional storm drain systems, which rely on pipes to move and to dispose of rainwater, green infrastructure directs runoff to locations where vegetation and natural processes help to control pollution. Infiltration and reuse also helps to reduce flooding downstream. Replacing concrete with living soils and other permeable surfaces, and providing more space for natural processes to flourish within our urban environments, enhances flood management, air quality, habitat, and recreational opportunities. The Ed P. Reyes River Greenway at the terminus of Humboldt Street is one of the first among many greenways proposed to extend the natural benefits of green infrastructure upstream into our urban watersheds.



Mycorrhizae

While infiltration and evaporation reduce the volumes of water that flow downstream, specialized fungi called "mycorrhizae" create a vast network of cells called "hyphae" in the soil. The hyphae seek out water and nutrients bringing them nearer to root zones where bacteria, working in association with plant root hairs, naturally degrade or absorb pollutants.



Plant Root with Mycorrhizal Fungi



The project is located in the Lincoln Heights community and within a sub-drainage area of the 870 square-mile Los Angeles River Watershed, where it helps to meet the City's water quality, natural open space, and river revitalization goals.



THE ED P. REYES RIVER GREENWAY 🧼



Prior to the natural treatment process large quantities of trash and sediment are removed with a structure called a hydrodynamic separator. This allows large sized pollutants to be easily collected and removed. Next, dry-weather runoff and a managed volume of the most polluted stormwater runoff called the "first-flush" enters the basin. Larger storm volumes either bypass the hydrodynamic separator, or enter the basin to overflow back to the original storm drain. Solar panels drive the pumps that circulate stormwater to areas where it can be further treated, or "polished" by bacterial organisms, and used to water plants in the landscape.





Sam Hawpat

Avenue 18

Project Site

Cross Section Underground Biofiltration System



Site Before Construction



The Ed P. Reyes River Greenway on the north bank of Los Angeles River daylights stormwater runoff from an existing storm drain that once delivered untreated runoff with high Levels of pollution to the river. The greenway mimics a dry-creek or arroyo ecosystem and supports a biological community that filters and further cleans runoff. The non-motorized public access between Avenues 18 and 19 represents a new and emerging street type for our city called a "Stormwater Greenway." As Stormwater Greenways enhance the natural processes that clean our waters, they also transform our streets by

offering new economic, environmental,

and social opportunities.

EXHIBIT B

Bureau of Engineering Los Angeles River Segment B and Arroyo Seco Proposed LFD Design and Construction Schedule

CITY OF LOS ANGELES INTERDEPARTMENTAL CORRESPONDENCE

- DATE: July 19, 2018
- TO: Enrique C. Zaldivar, Director LA Sanitation and Environment
- Gary Lee Moore, City Engineer Law (a Moore) Byreau of Engineering FROM: Bureau of Engineering

SUBJECT: IMPLEMENTATION FOR DESIGN AND CONSTRUCTION **MANAGEMENT OF FIVE (5) LOW FLOW DIVERSION PROJECTS** ALONG THE LOS ANGELES RIVER AND ARROYO SECO

The Bureau of Engineering (BOE) has reviewed the "Concept Report Revisions for the Three Downtown and Two Highland Park Low Flow Diversion Systems" (Concept Report) provided by LA Sanitation (LASAN). As confirmed in the meeting attended by staff from both bureaus on July 3, 2018, BOE will provide project implementation including pre-design, design, bid and award, and construction management for the five (5) Low Flow Diversion (LFD) systems along the Los Angeles River and Arroyo Seco.

To ensure attainment of water quality standards per Total Maximum Daily Load (TMDL) regulations, the BOE understands the necessity of the five proposed LFD systems intended to direct the dry weather flows to the nearby sanitary sewer system to meet water quality goals and standards set forth by the Los Angeles Regional Water Quality BOE has also reviewed the stringent regulatory Control Board (LARWQCB). compliance timeline set forth by the LARWQCB. Based on our review of the Concept Report, our knowledge and experience gained from the delivery of previous Proposition O Clean Water Division LFD Projects in the Palisades, we have developed feasible yet efficient delivery schedules with a 49 month and a 52 month project delivery duration for the Los Angeles River and Arroyo Seco LFD Projects respectively. The project schedules anticipate the delivery of each of the five LFD systems to occur in parallel with the projects starting in September 2018 and construction phase completions in September 2022 (Los Angeles River LFDs) and December 2022 (Arroyo Seco LFDs). See attached schedule which is subject to Program Review Committee authorization.

Should you have any questions or need additional information, please contact Christopher Johnson at (213) 485-1165, or Andy Flores at (213) 485-4496.

Attachment CJ/CAF/: nk

CC: Adel Hagekhalil, LASAN Lisa Mowrey, LASAN Shahram Kharaghani, LASAN Alfredo Magallanes, LASAN Ken Redd, BOE Chris Johnson, BOE Andy Flores, BOE



	No Schedule		Approvals	Manual Summary Rollup	•
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	TOS Development	ACCESSION DATES	Duration-only	 External Milestone	

EXHIBIT C

Los Angeles River Segment B Load Reduction Strategy 30 Percent Design Plans Diversion into existing Los Angeles County Sanitation Districts' sewer line



INDEX TO STANDARD PLANS

GENERAL NOTES

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7. THE CONTRACTOR SHALL MAKE EXPLORATORY EXCAVATIONS TO DETERMINE THE DEPTH AND LOCATION OF EXISTING UTILITIES WHERE SO INDICATED BY THE SYMBOL "A".

10. WHERE THE UTILITIES ARE INDICATED ON THE PLANS TO BE SUPPORTED, SAID SUPPORTS SHALL BE IN ACCORDANCE WITH SPPWC STANDARD PLAN 224-2 UNLESS OTHERWISE INDICATED

ALL OPENINGS RESULTING FROM THE CUTTING OR PARTIAL REMOVAL OF EXISTING CULVERTS. PIPES OR SIMILAR STRUCTURES SHALL BE SEALED WITH 6 INCHES OF BRICK AND MORTAR OR 6 INCHES OF CONCRETE, UNLESS OTHERWISE SHOWN.

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UTILITIES DESIGNATED BY THE SYMBOL "** WILL BE ABANDONED IN PLACE AND THE OWNER WILL INSTALL A NEW SECTION OF THE AFFECTED UTILITY AT A LOCATION IN CLOSE PROXIMITY TO, BUT WHICH DOES NOT PHYSICALLY INTERFERE WITH, THE PROPOSED STORM DRAIN CONDUIT AND APPURTENANT STRUCTURES. EXISTING UTILITIES SHALL BE MAINTAINED IN PLACE BY THE CONTRACTOR, UNLESS OTHERWISE NOTED, AND ALL UTILITIES CROSSING THE TRENCH SHALL BE TEMPORARILY SUPPORTED TO SATISFACTION OF THE OWNER.

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DDI 26 SEGMENT B LOAD REDUCTION

ENERAL NOTES AND INDEX TO STANDARD PLANS 000012 PCA F21816i24 DWG SHEET 2 OF 3



EXHIBIT D

Arroyo Seco Load Reduction Strategy Third Project Concept: Diversion to Existing Sewer Line



EXHIBIT E

Arroyo Seco Load Reduction Strategy Johnston Lake and San Raphael Creek Monitoring Data

KINNETIC LABORATORIES **INCORPORATED** 10377 LOS ALAMITOS BLVD. LOS ALAMITOS, CA 90720 (562) 357-4685

Data Report

Johnston Lake Sampling

April 25, 2018

This report presents the results from the collection of dry weather water samples from Johnston Lake and San Raphael Creek in the City of Pasadena. Dry weather sampling consisted of grab sampling by Kinnetic Laboratories, Inc. and a representative from John L. Hunter and Associates on March 16, 2018. Four water samples were collected from three monitoring locations shown on Figure 1. One sample was collected at an outfall prior to its discharge point to Johnston Lake (Site 2). Another sample plus a field duplicate sample (identified as Site 5) were collected from the lake prior to its discharge point to San Raphael Creek (Site 3). The last sample was collected was collected in San Raphael Creek (Site 4). There was no discharge from the Annandale County Club (Site 1) to the storm drain system (Figure 3), so a sample from this site could not be collected.

At the time of sampling, observations, photographs and water quality measurements were made at each site. These photographs are presented in Figures 2 through 7. Temperature, pH, percent dissolved oxygen, specific conductance, and turbidity measurements were made using a Multi-Parameter Sonde. Water quality measurements and observations are provided in Table 1.

The four water samples collected were submitted to Weck Laboratories, Inc. in the City of Industry immediately following sampling. These samples were analyzed for *E. Coli* by Method SM 9221F and the results are provided in Table 2.

The *E. Coli* data were checked for completeness, accuracy and precision. All samples were analyzed within the EPA recommended holding time and laboratory blanks were performed as necessary. Blank results were non-detect (ND). The Site 3 sample and corresponding field duplicate had a relative percent difference (RPD) of 0, indicating very good precision. However, no data qualifications were necessary.

The *E. Coli* results were compared to criteria from the Los Angeles Regional Water Quality Board (LARWQCB) Basin Plan, which sets numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy, and implements programs to protect all waters in the LA Region. All *E. Coli* results were less than the Single Sample Limit for Fresh Waters Designated for Water Contact Recreation (REC-1) and all



results were well below the Single Sample Limit for Fresh Waters Designated for Limited Contact Recreation (LREC-1).

Figure 1. Map of Sampling Locations

