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1149 SOUTH BROADWAY, 10TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-0587
FAX: (213) 485-3939
WWW.LACITYSAN.ORG

December 13, 2018

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

Dear Ms. Smith:

SANTA MONICA BAY JURISDICTIONAL GROUP 2 AND 3 WATERSHED MANAGEMENT GROUP COORDINATED INTEGRATED MONITORING PROGRAM REQUEST FOR REVISION

The City of Los Angeles, on behalf of the Santa Monica Bay Jurisdiction Group 2 and 3 Watershed Management Group (SMB J2/3 WMG), which also includes the cities of El Segundo and Santa Monica and Los Angeles County Flood Control District, is submitting this letter requesting approval of proposed revisions to the SMB J2/3 WMG Coordinated Integrated Monitoring Program (CIMP). This letter fulfills the requirement within the approved SMB J2/3 CIMP to submit revisions to the Regional Board requesting approval from the Executive Officer. The SMB J2/3 WMG proposes the following revisions:

1. In Section 2.1.4 of Attachment C of the CIMP (page C-25), the following language related to wet weather sampling feasibility is included: *“However, safety or other factors may make it infeasible to collect samples from a given storm event. For example, storm events that will require field crews to collect wet weather samples during holidays and/or weekends may not be sampled due to sample collection or laboratory staffing constraints.”* For consistency with other approved CIMPs in the region¹ we are requesting approval to replace the current language with the following: *“For safety reasons, sampling will occur during daylight hours, when possible. Sampling on weekends and holidays will also be avoided. Other constraints on sampling events include, but are not limited to lab closures and toxicity testing organism availability.”*

¹ Upper Los Angeles River CIMP Attachment C, Section 10.3 (page 141); Ballona Creek CIMP Attachment C, Section 10.3 (page 97); Dominguez Channel CIMP Attachment C, Section C.2.3 (page C-34); Upper Santa Clara River CIMP Attachment F, Section 2.3 (page F-28).

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2. Monitoring at the two receiving water sites located in Santa Monica Bay (RW-SMB-1 and 3) is conducted three times per year. These sites are located offshore, and must be accessed by boat. Deploying a boat entails a significant cost in terms of fuel, wear and tear on the vessel, and staff resources. However, at site RW-SMB-1, only general water quality parameters (e.g., dissolved oxygen, pH, temperature, and salinity) are required to be measured during the third storm event as there were no exceedances of Table E-2 constituents during the initial screening phase of monitoring. It not an efficient use of resources to deploy the boat (and crew) solely for collecting these on-site measurements when no other pollutant parameters are being sampled. As such, we are requesting approval for the following revisions (in *underlined italics*) to footnote 1 of Table 6 of the CIMP (page 27) so that sampling at a receiving water site in SMB is only required when pollutants or aquatic toxicity must also be monitored: “Annual frequency listed as number of wet-weather/dry-weather events per year, respectively (e.g., 3/2 signifies three wet weather and two dry weather events per year). *For receiving water sites located within Santa Monica Bay (i.e., RW-SMB-1 and RW-SMB-3), field parameters are not required to be monitored if there are no other constituents (e.g. pollutants identified in Table E-2 of the MRP and aquatic toxicity) that must be monitored for a given monitoring event.*” The proposed revisions will result in one event being discontinued at this time. If in the future there are other constituents to be monitored, the proposed language would not affect their collection.

If you have any questions regarding our comments, please contact me at (213) 485-0587 or via e-mail at Shahram.Kharaghani@lacity.org.

Sincerely,


SHAHRAM KHARAGHANI, PhD, PE, BCEE
Program Manager

SK:JB:la
WPDCR9470

c: Renee Purdy, LARWQCB
Ivar Ridgeway, LARWQCB
Vivian Marquez, LASAN
Hubertus Cox, LASAN
Jonathan Ball, LASAN
Taraneh Nik-Khah, LASAN