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December 16, 2013

Samuel Unger, Executive Officer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Attention: Renee Purdy

Dear Mr. Unger:

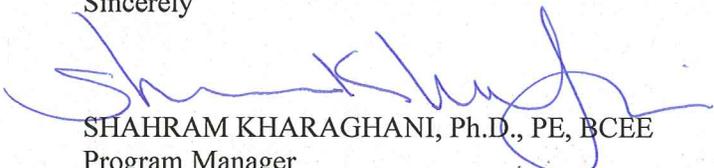
**SUBMITTAL OF REVISED NOTICE OF INTENT FOR DEVELOPMENT OF WATERSHED
MANAGEMENT PROGRAM AND COORDINATED INTEGRATED MONITORING PROGRAM FOR
THE CITY OF LOS ANGELES LAND AREA WITHIN THE JURISDICTIONAL GROUP SEVEN OF
THE SANTA MONICA BAY WATERSHED**

This is in response to your letter dated November 26, 2013 regarding your review of the Notice of Intent (NOI) for the Enhanced Watershed Management Program for the City of Los Angeles land area within the Jurisdictional Group 7 of the Santa Monica Bay Watershed. According to your request, the City of Los Angeles is providing the attached revised NOI with the modified approach to develop a Watershed Management Program (WMP) instead of an Enhanced Watershed Management Program for this area.

We hope that the revised NOI satisfies the requirements of RWQCB's review and we look forward to continuing the process of WMP development for the City's land area within the Jurisdictional Group 7 of the Santa Monica Bay Watershed.

Should you have any questions about this submittal, please contact me at Shahram.Kharaghani@lacity.org or phone (213) 485-0587 or your staff may contact Huub Cox at hubertus.Cox@lacity.org or phone (213) 485-3984 or Hamid Tadayon at Hamid.Tadayon@lacity.org or phone (213) 485-3841.

Sincerely


SHAHRAM KHARAGHANI, Ph.D., PE, BCEE
Program Manager

SK:HC:ht
WPDCR9090

Attachment

Mr. Samuel Unger
Los Angeles Regional Water Quality Control Board
December 16, 2013
Page 2 of 2

cc: Renee Purdy, California Regional Water Quality Control Board, Los Angeles Region
Ivar Ridgeway, California Regional Water Quality Control Board, Los Angeles Region
Enrique Zaldivar, City of Los Angeles, Bureau of Sanitation
Adel Hagekhalil, City of Los Angeles, Bureau of Sanitation
Gary Hildebrand, County of Los Angeles, Department of Public Works
Rick Valte, City of Santa Monica
Stephanie Katsouleas, City of El Segundo

NOTICE OF INTENT

**Watershed
Management Program
and
Coordinated Integrated
Monitoring Program**

**Santa Monica Bay
Watershed
Los Angeles
Area in J7**

**City of Los Angeles
Los Angeles County Flood Control
District**

December 17, 2013

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Notice of Intent for WMP and CIMP for City of Los Angeles Area in Santa Monica Bay Jurisdictional Group 7

1. Introduction

The City of Los Angeles has been a participating agency of Jurisdictional Group 7 (J7) of the Santa Monica Bay Watershed since the adoption of the Santa Monica Bay Beaches Bacteria TMDLs in 2003. However, the City of Los Angeles and the other MS4 permittees in J7 could not reach an agreement for a collaborative approach to satisfying the requirements of the MS4 permit. Following the request by the RWQCB on November 26, 2013 to pursue a Watershed Management Program (WMP) instead of an Enhanced Watershed Management Program (EWMP), the City of Los Angeles and the Los Angeles County Flood Control District (LACFCD) respectfully submit this revised Notification of Intent (NOI) to develop a WMP for the City of Los Angeles land area within J7 of the Santa Monica Bay watershed per Part VI.C.4.b.i of Order No. R4-2012-0175 (MS4 Permit). Additionally, this NOI includes a statement of the City of Los Angeles' and the LACFCD's intent to follow a Coordinated Integrated Monitoring Program (CIMP) approach. The City of Los Angeles will continue its collaboration with other Peninsula cities should there be opportunities during the development and implementation of the WMP and CIMP to ensure that the MS4 permit requirements are met most effectively.

The following sections are intended to provide specific information related to the City of Los Angeles area in J7 of the Santa Monica Bay watershed.

2. Notification of Intent (Section VI.C.4.b.i and Attachment E Section IV.C.1.)

The City of Los Angeles and LACFCD notify the LARWQCB by this NOI of their intention to collaboratively develop an WMP for the City of Los Angeles land area of J7 in the Santa Monica Bay Watershed, and will submit a Final Plan no later than 18 months after the effective date of the MS4 Permit (June 28, 2014)

Additionally, the City of Los Angeles and LACFCD notify the LARWQCB by this NOI of their intention to collaboratively develop a CIMP for the City of Los Angeles land area of J7 in the Santa Monica Bay Watershed, and will submit a Draft CIMP no later than 18 months after the effective date of the MS4 Permit (June 28, 2014).

3. Interim and final TMDL compliance deadlines (Section VI.C.4.b.ii)

Table 1 lists the TMDLs that have been developed for the Santa Monica Bay watershed. The interim and final compliance deadline of the Santa Monica Bay Nearshore and Offshore TMDL and final compliance deadline of other TMDLs occurring prior to the anticipated approval date of WMP (April 28, 2015) are included in Table 2.

The watershed control measures that have been or will be implemented to meet the applicable interim and final trash water quality based effluent limitations (WQBELs) and all other final WQBELs and receiving water limitations are described in more detail in Section 10 of this NOI submittal.

Table 1. TMDLs applicable to Santa Monica Bay watershed

TMDL	LARWQCB Resolution Number	Effective Date and/or EPA Approval Date
Santa Monica Bay Beaches Dry Weather Bacteria TMDL (Summer and Winter Dry)	2002-004	7/15/2003
Santa Monica Bay Beaches Wet Weather Bacteria TMDL	2002-022	7/15/2003
Santa Monica Bay Nearshore and Offshore Debris TMDL	R10-010	03/20/2012
Santa Monica Bay DDTs and PCBs TMDL	NA	03/26/2012

Table.2. Interim (debris) and final TMDL compliance deadlines prior to WMP approval

TMDL	Milestone	Interim/Final	Deadline
Santa Monica Bay Beaches Dry Weather Bacteria TMDL	Compliance with allowable exceedance days during summer dry period	Final	07/15/2006
	Compliance with allowable exceedance days during winter dry period	Final	07/15/2009

4. Geographical scope (Section VI.C.4.b.iii.(1))

J7 of the Santa Monica Bay watershed is comprised of the Cities of Rancho Palos Verdes, Palos Verdes Estate, Rolling Hills, and Rolling Hills Estate (collectively referred to as Peninsula Cities), and the City of Los Angeles. The City of Los Angeles area is approximately 976.61 acres, or 9.4% of the total area of J7 as shown in Attachment 1. J7 has unique characteristics that differentiate it from other Santa Monica Bay Jurisdictional Groups. Many of the storm drains on Palos Verdes Peninsula have outfalls on steep bluffs that are up to hundred feet high; some of these outfalls are at rocky points locations without safe access to the shoreline.

The City of Los Angeles land area of J7 includes open space from the White Point Nature Preserve Wild Park featuring 102 acres of restored coastal sage scrub habitat, hiking and handicap accessible trails overlooking the ocean and Catalina Island. Currently, there are three active shoreline stations for bacteria monitoring within the City of Los Angeles area of J7 (SMB 7-6, SMB 7-8, and SMB 7-9), and one inactive station (SMB 7-7), which is inaccessible and unsafe to enter due to a land slide in 2009 (Attachment B.2).

All drainage infrastructure operated and maintained by the LACFCD within the City of Los Angeles land area in J7 of the Santa Monica Bay Watershed Management Area will be covered under this WMP.

5. Cost estimate (Section VI.C.4.b.iii.(2))

The City of Los Angeles and the LACFCD collaboratively prepared a scope of work and cost estimate for developing the WMP Plan and, the CIMP for the City of Los Angeles' area in J7 of the Santa Monica Bay Watershed. It is estimated that the cost for the development of WMP Plan and the CIMP is approximately \$50,000. Of that, 20% is allocated for the CIMP, and 80% for WMP. This estimate assumes that the CIMP and WMP will, in part, be based on the existing TMDL Coordinated Monitoring Plans and Implementation Plans.

6. Memorandum of understanding (Section VI.C.4.b.iii.(3))

At the time of submitting the NOI for an EWMP in June 2013, the City of Los Angeles and LACFCD agreed to executing a Memorandum of Understanding to share the cost for development of EWMP and CIMP. The City of Los Angeles and the LACFCD will determine at a later time whether to execute the original MOU, or to execute a revised MOU that reflects the intent to develop of a WMP. A copy of the original MOU and the letters of intent from both permittees can be found in the original NOI which was submitted on June 27, 2013.

7. Interim milestones and deadlines for plan development (section VI.C.4.b.iii.(4))

Table.4 summarizes the interim milestone and deadlines for the CIMP and WMP Plan development, which is based on the scope of work for developing the CIMP and WMP as agreed to by the City of Los Angeles and the LACFCD. Interim milestones in Table 4 are the expected due dates of draft Technical Memoranda and/or draft plans that will summarize the information and approaches for development of the specified components of the CIMP and WMP Plan. It is expected that the draft technical memos will not be finalized; rather, the information presented in the memos will be revised based on comments and presented in the CIMP and WMP Plan.

Table .4. Proposed interim milestones and deadlines for plan development

Deliverable	Milestones and Deadlines
Draft WMP Plan	April 2014
Final Draft WMP Plan submitted to the LARWQCB	June 2014
Coordinated Integrated Monitoring Program	
Draft Technical memos	March 2014
<ul style="list-style-type: none"> • Outfall and receiving water monitoring approach • Monitoring sites selection • New development and redevelopment effectiveness 	
tracking	
Draft CIMP	April 2014
Final Draft CIMP submitted to the LARWQCB	June 2014

8. LID ordinance (Sections VI.C.4.b.iii.(6) and VI.C.4.c.iv. (1))

Table 5 summarizes the status of Low Impact Development (LID) ordinances by the City of Los Angeles and LACFCD. As presented in Table 5, greater than 50% of the land area addressed by the geographical scope of the WMP is addressed by an LID ordinance that is in place.

Table 5. Summary of percent EWMP area addressed by LID ordinances

WMP agency	Status LID ordinance	% WMP area addressed by LID ordinance
City of Los Angeles	In place	100%
LACFCD	N/A	N/A
Total WMP Area covered by LID Ordinance		100%

In Place – Permittee has adopted an LID Ordinance that is in compliance with the requirements of the MS4 Permit for its portion in the watershed. For the City of Los Angeles: its LID Ordinance became operative on May 12, 2012. The City of Los Angeles is currently amending sections of the LID Ordinance, as well as its Stormwater and Urban Runoff Pollution Control Ordinance (L.A.M.C. Chapter VI, Article 4.4) to meet all the MS4 permit requirements.

9. Green street polices (Sections VI.C.4.b.iii.(6) and VI.C.4.c.iv. (2))

Table 6 summarizes the status of green street policies by the City of Los Angeles and the LACFCD. As presented in Table.6, greater than 50% of the land area addressed by the geographical scope of the WMP is addressed by green streets policies that are in place.

Table 6. Summary of percent WMP area addressed by Green Street Policies

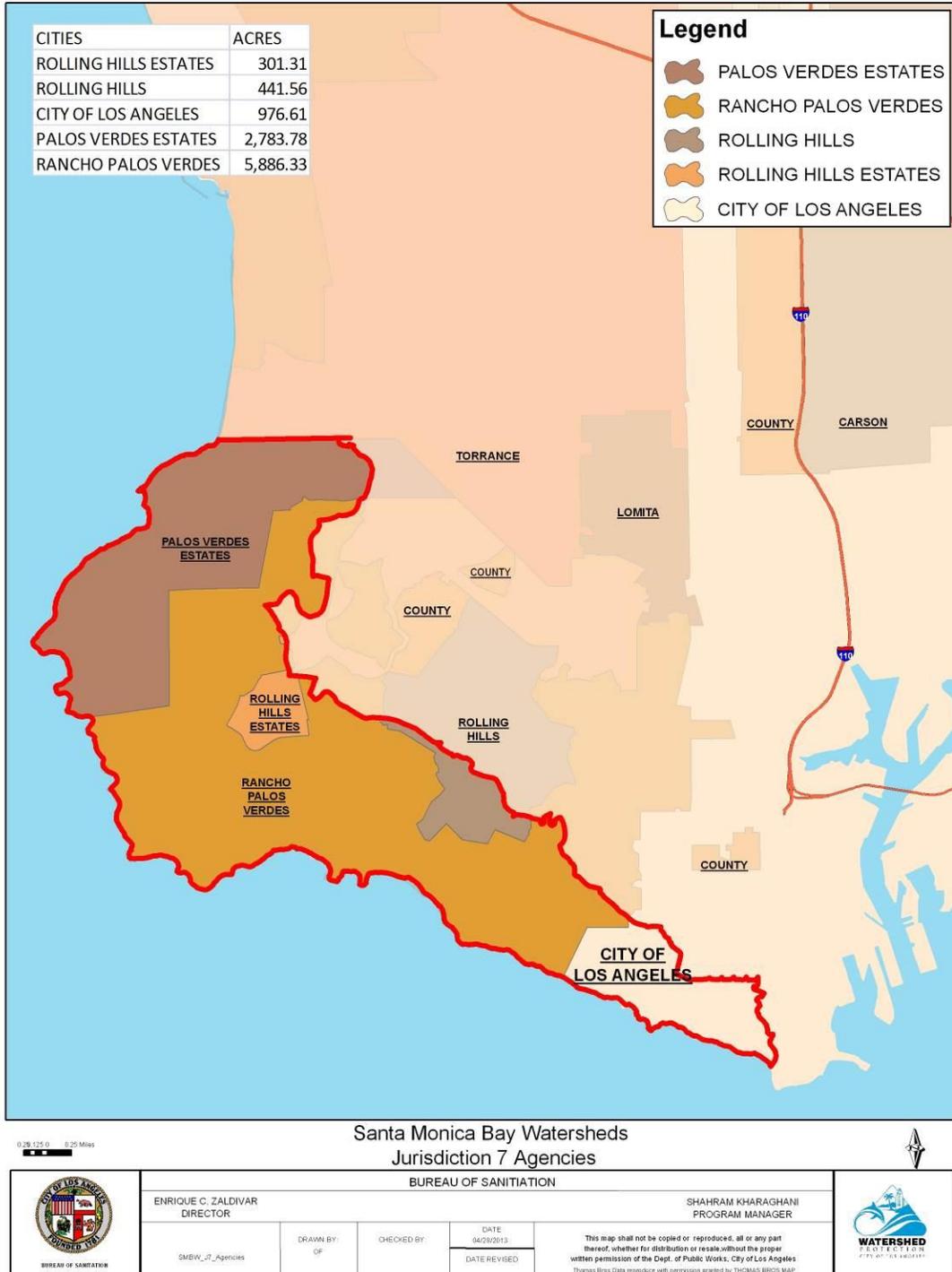
WMP agency	Status of Green Street Policy	% WMP area addressed by Green Street Policy
City of Los Angeles	In place	100%
LACFCD	N/A	N/A
Total WMP Area covered by LID Ordinance		100%

In Place – Permittee has adopted a Green Street Policy that is in compliance with the requirements of the MS4 Permit for its portion in the watershed.

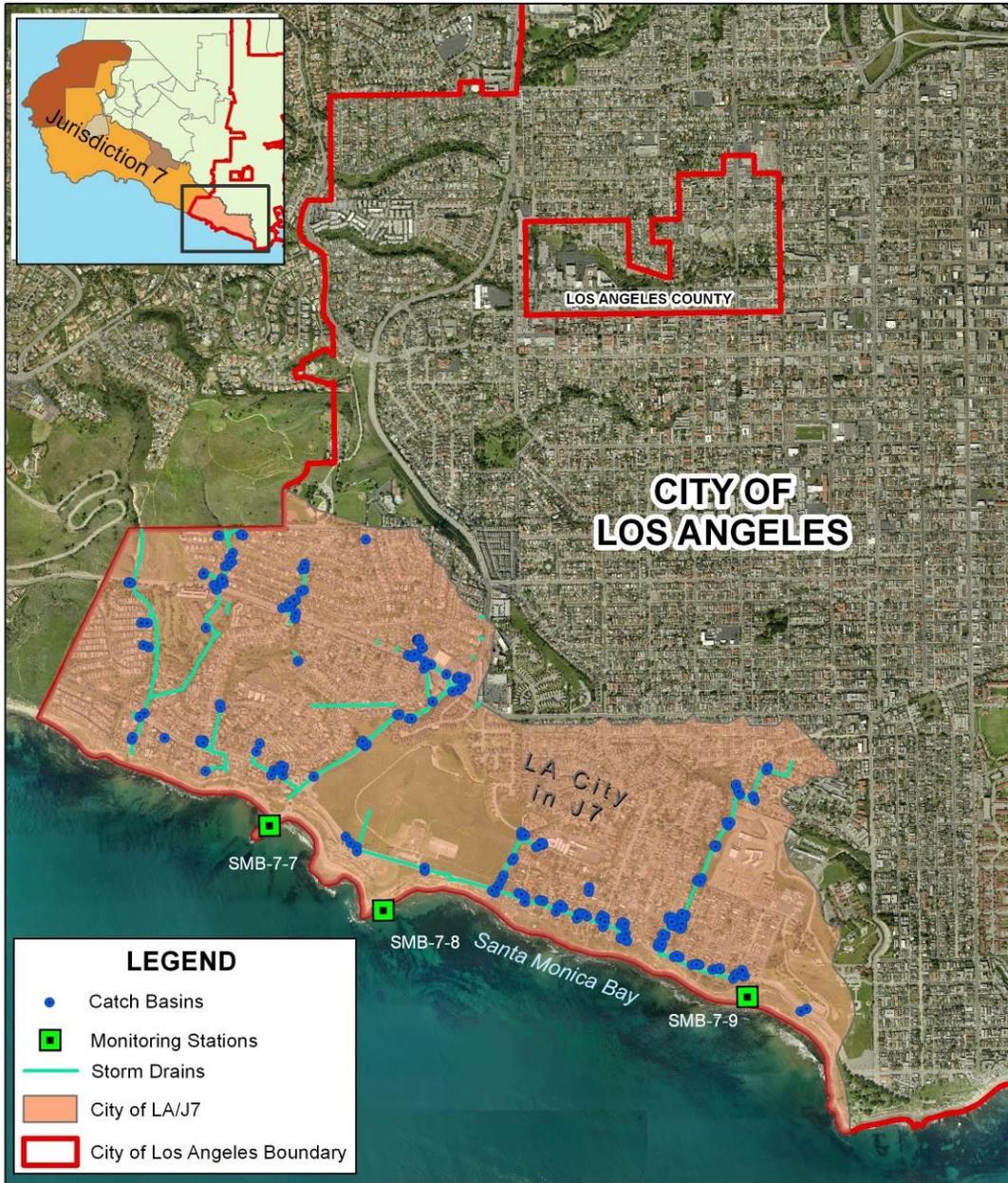
10. Implementation of watershed control measures during plan development (Sections VI.C.4.b.ii)

The City of Los Angeles has implemented an extensive program of institutional measures (street sweeping, catch basin cleaning, public education, etc.) for pollution source control that supports reduction of bacteria discharges from the City of Los Angeles land area in J7 of the Santa Monica Bay watershed. In addition, the City will retrofit 50 catch basins with screens and/or inserts within its area to satisfy the 20% compliance milestone of the Santa Monica Bay Nearshore and Offshore Debris TMDL by March 2016.

Attachment 1. The City of Los Angeles land area within J7 of the Santa Monica Bay Watershed.



Attachment.2. The City of Los Angeles detailed land area within J7 of the Santa Monica Bay Watershed.



Santa Monica Bay Watersheds
City of Los Angeles in Jurisdiction 7

 BUREAU OF SANITATION	BUREAU OF SANITATION			SHAHRAM KHARAGHANI PROGRAM MANAGER	 WATERSHED PROTECTION
	ENRIQUE C. ZALDIVAR DIRECTOR	DRAWN BY: IH	CHECKED BY:		
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