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April 11, 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

HAND DELIVERED

Attention: Ms. Deborah Brandes

Dear Ms. Smith:

REQUEST FOR TIME EXTENSION OF THE 2018 INTERIM MILESTONE OF ENHANCED WATERSHED MANAGEMENT PROGRAM OF SANTA MONICA BAY JURISDICTIONAL GROUPS 2 AND 3

The Santa Monica Bay Jurisdictional Groups 2 and 3 Watershed Management Group (SMB WMG) is requesting a time extension for the July 2018 interim milestone of its Enhanced Watershed Management Program (SMB EWMP). The SMB WMG consists of the City of El Segundo, the City of Los Angeles, the City of Santa Monica, the County of Los Angeles, and Los Angeles County Flood Control District. The City of Los Angeles is the lead agency of the SMB WMG and has prepared this request on behalf of all SMB WMG members.

Enhanced Watershed Management Program

On April 13, 2016, the SMB WMG submitted its last revision of the SMB EWMP to the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board), which was approved on April 21, 2016. The SMB EWMP provides a detailed strategy with the actions by the SMB WMG for compliance with the MS4 Permit and the TMDLs that are applicable to the Santa Monica Bay watershed. The SMB EWMP also specifies an interim milestone by 2018. Even though the SMB EWMP did not specify a specific date in 2018, it may be inferred that the interim milestone of the SMB EWMP coincides with the 50% compliance milestone of the Santa Monica Bay Beaches Wet Weather Bacteria TMDL (Resolution No. 2002-022) on July 15, 2018. Section 5 of the SMB EWMP specifies the implementation targets for 50% compliance milestone of the Santa Monica Bay Beaches Wet Weather Bacteria TMDL.

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Progress toward water quality compliance

The SMB WMG is subject to four TMDLs: bacteria during dry and wet weather, debris, and DDTs/PCBs. The efforts by the SMB WMG have significantly improved the water quality in the Santa Monica Bay watershed. We refer to the Watershed Forms of the MS4 Permit Annual Reports, submitted by the SMB WMG to the Los Angeles Water Board for Fiscal Years (FY) 2015-16 and 2016-17, for detailed water quality analyses. This section briefly summarizes the progress towards meeting TMDL compliance milestones, as follows:

1. **Santa Monica Bay Beaches Dry-Weather Bacteria TMDL:** The SMB WMG has installed 23 Low Flow Diversions (LFDs) throughout the area of Jurisdictional Groups 2 and 3 of the Santa Monica Bay Watershed. These LFDs divert all dry weather runoff from all major storm drains to the Hyperion Water Reclamation Plant during the summer months (since 2006) and winter months (since 2009). The SMB WMG has complied with this TMDL by eliminating all MS4 discharges when it is not raining and year-round. Any exceedances when the LFDs are operating are not due to runoff, and not exceedances as per the TMDL.
2. **Santa Monica Bay Beaches Wet-Weather Bacteria TMDL:** As summarized in Table 31 of the Watershed Form of the 2016-17 MS4 Permit Annual Report, the SMB WMG has met the 50% reduction milestone of this TMDL for Jurisdictional Group 2. For Jurisdictional Group 3, the number of exceedance days in FY 2016-17 are above the 50% reduction milestone.
3. **Santa Monica Bay Nearshore and Offshore Debris TMDL**
Compliance with the interim milestones of this TMDL is evaluated as implementation of trash capture devices in the watershed. The SMB WMG is on track as reported in the MS4 Permit Annual Reports.
4. **Santa Monica Bay PCBs/DDTs TMDL**
Monitoring of PCBs and DDTs began in FY 2016-17 after approval of the Coordinated Integrated Monitoring Program by the Los Angeles Water Board in November 2015. Compliance with the TMDL is evaluated as the three-year average loading of PCBs and DDTs. The first assessment of this three-year average loading will be in the upcoming MS4 Permit Annual Report due in December 2018.

Progress with Implementation

The SMB WMG is making significant progress with the implementation of regional and green street BMPs that were identified in the SMB EWMP. A comprehensive list of the SMB WMG's efforts to implement the SMB EWMP projects can be found in Section 2 of the MS4 Permit Annual Reports for FY 2015-16 and 2016-17. Many projects have been completed since the early adoption of the Santa Monica Bay Beaches Bacteria TMDLs in 2002. The following table summarizes the projects that have been completed or are in progress since the adoption of the latest MS4 Permit in December 2012:

Project name	Agency	Status
Catch Basin Retrofits	City of Los Angeles	Completed
Catch Basin Retrofits	City of El Segundo	Construction
Temescal Canyon Phase I	City of Los Angeles	Completed
Temescal Canyon Phase II	City of Los Angeles	Construction
Riviera Country Golf Club	City of Los Angeles	Planning
Old Oak Road	City of Los Angeles	Completed
Penmar Phase I	City of Los Angeles	Completed
Penmar Phase II	City of Los Angeles	Construction
Argo Drain Sub-Basin Facility (at LAX)	City of Los Angeles	Planning
Los Amigos Park	City of Santa Monica	Completed
Marine Park	City of Santa Monica	Completed
Santa Monica Pier Cistern/Use	City of Santa Monica	Completion Summer 2018
Coastline Beach Parking Lot	County of Los Angeles	Planning
Coastline Drive Green Street	County of Los Angeles	Completed

Similarly, the SMB WMG is progressing with the identification and prioritization of new green street opportunities in the watershed. For example, the City of Los Angeles has identified and produced eight green street concept reports:

- Cabrillo Boulevard Green Street (Santa Monica Beach)
- May Street Green Street (Santa Monica Beach)
- Marquez Avenue Green Street (Will Rogers Beach)
- Mesa Road Green Street (Will Rogers Beach)
- Palms Boulevard Green Street (Santa Monica Beach)
- Rose Avenue Green Street (Venice Beach)
- San Juan Avenue Green Street (Venice Beach)
- Sunset Boulevard Stormwater BMP (Will Rogers Beach)

Implementation of these green street projects, as well as many other regional projects identified in the SMB EWMP, is subject to availability of new funding.

Time extension request

Tables 5.3 and 5.4 of the SMB EWMP provide the overall targets for the implementation of regional projects and green streets, as follows:

Table 5.3 – Regional BMP capacity required for compliance (acre-feet)

Milestone	County of Los Angeles	City of Los Angeles	City of Santa Monica	City of El Segundo
2018	0.0	30.1	29.0	30.6
2021	0.2	105.4	21.3	0
Total	0.2	135.5	50.3	30.6

Table 5.4 – Green street BMP capacity required for compliance (acre-feet)

Milestone	County of Los Angeles	City of Los Angeles	City of Santa Monica	City of El Segundo
2018	0.5	35.1	20.2	0
2021	0.5	25.3	15.1	0
Total	1.0	60.4	35.3	0

The SMB WMG is requesting a time extension for the 2018 interim milestone until the final 2021 compliance as follows:

Proposed Table 5.3 – Regional BMP capacity required for compliance (acre-feet)

Milestone	County of Los Angeles	City of Los Angeles	City of Santa Monica	City of El Segundo
Total by 2021	0.2	135.5	50.3	30.6

Proposed Table 5.4 – Green street BMP capacity required for compliance (acre-feet)

Milestone	County of Los Angeles	City of Los Angeles	City of Santa Monica	City of El Segundo
Total by 2021	1.0	60.4	35.3	0

Approval of this request by the Los Angeles Water Board would provide the SMB WMG with the necessary time to complete the projects that are currently in progress, as well as to acquire additional funding sources for the design and construction of the projects required for final compliance by 2021. The SMB WMG is committed to improving the water quality of Santa Monica Bay will continue the implementation of all other watershed control measures of the SMB EWMP, and report its progress annually to the Los Angeles Water Board.

If you have any questions about this request or wish to discuss this further, please contact me at (213) 485-0587 or Shahram.Kharaghani@lacity.org or your staff may contact Hubertus Cox at (213) 485-3984 or Hubertus.Cox@lacity.org.

Sincerely,

SHAHRAM KHARAGHANI, PhD, PE, BCEE
Program Manager

AF/SK:la

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- Neal Shapiro, City of Santa Monica, Office of Sustainability and the Environment
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