

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI

MAYOR

BOARD OF PUBLIC WORKS MEMBERS

KEVIN JAMES
PRESIDENT

CECILIA CABELLO
VICE PRESIDENT

DR. MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JOEL F. JACINTO
COMMISSIONER

AURA GARCIA
COMMISSIONER

BUREAU OF SANITATION

ENRIQUE C. ZALDIVAR
DIRECTOR AND GENERAL MANAGER

TRACI J. MINAMIDE
CHIEF OPERATING OFFICER

LISA B. MOWERY
CHIEF FINANCIAL OFFICER

MAS DOJIRI
JOSE P. GARCIA
ALEXANDER E. HELOU
ASSISTANT DIRECTORS

TIMEYIN DAFETA
HYPERION EXECUTIVE PLANT MANAGER

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:

UPPER LOS ANGELES RIVER WATERSHED MANAGEMENT GROUP COORDINATED INTEGRATED MONITORING PROGRAM REQUEST FOR REVISION

The City of Los Angeles, on behalf of the Upper Los Angeles River Watershed Management Group (ULARWVG), which also includes the cities of Alhambra, Burbank, Calabasas, Glendale, Hidden Hills, La Cañada Flintridge, Montebello, Monterey Park, Pasadena, Rosemead, San Fernando, San Gabriel, San Marino, South El Monte, South Pasadena, Temple City and the County of Los Angeles, is submitting this letter requesting approval of proposed revisions to the ULARWVG Coordinated Integrated Monitoring Program (CIMP). This letter fulfills the requirement within the approved CIMP to submit a separate letter to the Regional Board requesting approval from the Executive Officer. The ULARWVG proposes the following revisions (please refer to the enclosed Attachment A, Attachment B and Attachment C for further supporting documentation):

1. The Project Reporting Limit (RL) listed in Table 24 of Attachment C of the CIMP for Total Dissolved Solids (TDS) is 10 mg/L (page 112). To obtain this RL, the ULARWVG must use a contract laboratory to conduct the analysis. The use of a contract laboratory (as opposed to the City of Los Angeles' Environmental Monitoring Division [EMD] laboratory) results in an increased cost to the ULARWVG and poses a risk related to chain of custody/sample security as the samples must be shipped out for analysis. To reduce costs and risk, the ULARWVG is requesting approval to revise the Target RL in Table 24 to 28 mg/L, which EMD can currently attain. The lowest TDS water quality objectives applicable to the receiving waters in the ULARWVG (250 mg/L) is an order of magnitude higher than the proposed revised Project RL and detected values are also generally an order of magnitude higher than the proposed revised Project RL of 28 mg/L (number of samples = 68 and average = 716 mg/L).

zero waste • one water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

Recyclable and made from recycled waste



2. The ULARWMG is requesting approval to relocate the MCC_VAL receiving water monitoring site to the following coordinates: 34.165452, -118.635050 and the DCC_VEN receiving water monitoring site to the following coordinates: 34.165393, -118.635016. These sites are further downstream than the original sites and improve the accessibility of the sites. A map showing the proposed new location for each site and revised Fact Sheets to be included within the CIMP are presented within Attachment A. Additionally, Table 4 on page 11 of the CIMP and Table 17 on page 48 of Attachment B of the CIMP would be revised to include the new coordinates.
3. As noted in the CIMP, implementation of autosampling equipment was subject to the availability and approval of permits from various agencies (e.g., Army Corps of Engineers, Los Angeles County Flood Control District). It was anticipated that the permitting and installation process of the fixed autosamplers would be completed within 18 to 30 months (inclusive of 3 to 10 months to obtain required permits) per the schedule outlined in Section 13 of the CIMP. As such, it was anticipated that all autosampling equipment could be installed by October 2018. However, autosampling equipment has not been installed at all scheduled sites because of delays in the permit review and approval process outside of the City of Los Angeles' control.

The Los Angeles River Reach 2 (LAR_02_SW_MAI), Reach 4 (LAR_04_SW_BUE), and Reach 6 (LAR_06_SW_WIN) primary stormwater outfall sites are all infeasible to monitor without automated equipment. As such, the approved alternate stormwater outfall sites identified in Attachment B of the CIMP were evaluated. Two of the approved stormwater outfall alternate sites (Reach 2 and Reach 4) were identified as potential safety risks if monitored during wet weather sampling without automated equipment. Nevertheless, the ULARWMG tried to monitor those two sites during the first two wet weather events of the 2018/19 wet season and confirmed them to be unsafe. Please refer to Attachment B for photographs documenting the unsafe conditions at each site. The third stormwater outfall alternate site (Reach 6) has been successfully monitored during the first two wet weather events of the 2018/19 wet season.

The ULARWMG is requesting approval to suspend monitoring at the Reach 2 and Reach 4 stormwater outfall sites for this wet season. The ULARWMG will continue to work to get the necessary permits to install automated sampling equipment and will monitor these sites during the 2019/20 wet season if automated sampling equipment can be installed. If automated sampling equipment cannot be installed at these sites, the ULARWMG will find replacement alternate sites that do not pose a safety risk during wet weather and will submit a request for the replacement alternate sites to be approved by the Regional Board Executive Officer prior to the 2019/20 wet season.

4. Since the beginning of the Permit term (December 2012), 797 receiving water samples have been obtained for dissolved copper, lead, and zinc in the ULARWMG EWMP area. None of the 797 samples exceeded their applicable objective (i.e., respective TMDL numeric targets for TMDL waterbodies or California Toxics Rule freshwater acute criteria for non-TMDL waterbodies). Tables 1 through 3 presented in Attachment C to this letter present a summary of the data for dissolved copper, lead, and zinc, respectively. As such, it does not seem necessary to continue to conduct dry weather monitoring quarterly (or nine times per year in some instances). Semiannual monitoring (consistent with default frequency specified in the MS4 Permit) should be sufficient to verify that this pattern of non-exceedance does not change. As such, the ULARWMG requests approval for the following revisions to Table 5 of the CIMP for receiving water sites located in

the Los Angeles River mainstem (LAR_02_WAS, LAR_03_FIG, LAR_03_ZOO, LAR_04_TUJ, LAR_05_SEP, and LAR_06_WHI) and Table 6 of the CIMP for sites located in Los Angeles River tributaries (CC_ELS, RH_SLA, BWC_RIV, and TW_MOO):

- a. Revise the dry weather monitoring frequency of hardness, copper (total and dissolved), lead (total and dissolved), and zinc (total and dissolved) from quarterly or nine times per year to two times per year.
- b. Add the following footnote and apply it to hardness, copper, lead, and zinc that would trigger a return to quarterly sampling as follows: *“Monitoring sites monitored semiannually during dry weather (i.e., annual frequency is listed as X/2) for monitoring related to the Metals TMDL will be monitored quarterly (i.e., annual frequency will become X/4) if there are two consecutive exceedances of the applicable objective observed during dry weather at the monitoring site and would continue until the deactivation criterion is triggered. The deactivation criterion is two consecutive samples that do not exceed the applicable objective during dry weather.”*

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,

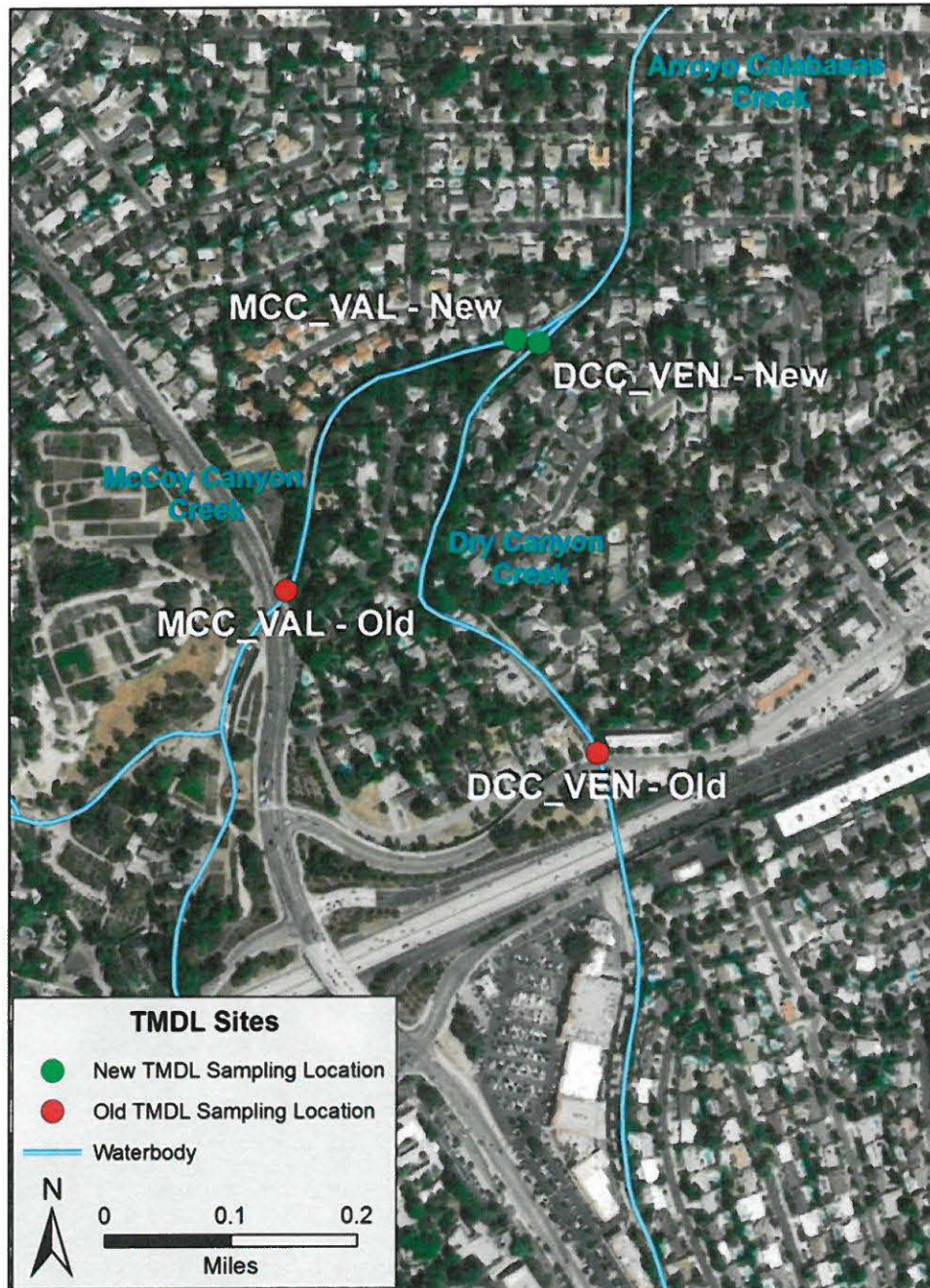


SHAHRAM KHARAGHANI, PhD, PE, BCEE
Program Manager

SK:JB:la
WPDCR9473

- c: Renee Purdy, LARWQCB
Ivar Ridgeway, LARWQCB
Vivian Marquez, LASAN
Alfredo Magallanes, LASAN
Jonathan Ball, LASAN
Taraneh Nik-Khah, LASAN
Dawn Petschauer, LASAN

Attachment A
Proposed Revisions to Locations for DCC_VEN and MCC_VAL
Aerial View and Updated Summary of Receiving Water Monitoring Sites and
Monitoring Location Fact Sheets



New Locations for DCC_VEN and MCC_VAL in Relation to the Previously Approved Locations

6.2.13 McCoy Canyon Creek TMDL Site

Waterbody Name	Waterbody Type	Site ID	Historical Site ID	Site Type	Latitude	Longitude
McCoy Canyon Creek	Tributary	MCC_VAL	LARB-14	TMDL	34.165452	-118.635050

General Description: Dry weather TMDL monitoring site located in McCoy Canyon Creek at Valley Circle Blvd. Initially, this monitoring site is only intended to be monitored to satisfy the requirements of the Bacteria TMDL. As such, flow will not be monitored at this site.



MCC_VAL Aerial View



MCC_VAL Ground-Level View

6.2.14 Dry Canyon Creek TMDL Site

Waterbody Name	Waterbody Type	Site ID	Historical Site ID	Site Type	Latitude	Longitude
Dry Canyon Creek	Tributary	DCC_VEN	LARB-15	TMDL	34.165393	-118.635016

General Description: Dry weather TMDL monitoring site located in Dry Canyon Creek at Ventura Blvd. Initially, this monitoring site is only intended to be monitored to satisfy the requirements of the Bacteria TMDL. As such, flow will not be monitored at this site.



DCC_VEN Aerial View



DCC_VEN Ground-Level View

Attachment B
Photographs Documenting Unsafe Conditions at Los Angeles River Reach 2
and Reach 4 Subwatershed Stormwater Monitoring Outfall Alternate Sites



Los Angeles River Reach 2 Subwatershed Alternate Site



Los Angeles River Reach 4 Subwatershed Alternate Site

Attachment C
Summary of Los Angeles River Metals TMDL Data Collected During the 2012 MS4 Permit Term

Table 1. Summary of Available Dissolved Copper Data for Waterbodies Addressed by the Los Angeles River Metals TMDL (Coordinated Monitoring Plan Data Collected from January 2013 through November 2015 and Coordinated Integrated Monitoring Program Data Collected from November 2015 through June 2018)

Waterbody	Number of Samples						
	2013	2014	2015	2016	2017	2018	Total
Burbank Western Channel	5	8	6	4	4	2	29
Compton Creek	4	8	3	4	4	2	25
LA River Reach 2	5	8	6	4	4	2	29
LA River Reach 3	9	16	12	7	9	4	57
LA River Reach 4	6	8	6	4	4	2	30
LA River Reach 5	5	8	6	4	4	2	29
LA River Reach 6	5	8	6	4	4	2	29
Rio Hondo	0	0	0	0	3	2	5
Tujunga Wash	4	8	6	11	8	4	41
Total	43	72	51	42	44	22	274

Table 2. Summary of Available Dissolved Lead Data for Waterbodies Addressed by the Los Angeles River Metals TMDL (Coordinated Monitoring Plan Data Collected from January 2013 through November 2015 and Coordinated Integrated Monitoring Program Data Collected from November 2015 through June 2018)

Waterbody	Number of Samples						
	2013	2014	2015	2016	2017	2018	Total
Burbank Western Channel	5	8	6	4	4	2	29
Compton Creek	4	8	3	4	4	2	25
LA River Reach 2	5	8	6	4	4	2	29
LA River Reach 3	9	16	12	7	9	4	57
LA River Reach 4	5	8	6	4	4	2	29
LA River Reach 5	5	8	6	4	4	2	29
LA River Reach 6	5	8	6	4	4	2	29
Rio Hondo	0	0	0	0	3	2	5
Tujunga Wash	4	8	6	4	6	2	30
Total	42	72	51	35	42	20	262

Table 3. Summary of Available Dissolved Zinc Data for Waterbodies Addressed by the Los Angeles River Metals TMDL (Coordinated Monitoring Plan Data Collected from January 2013 through November 2015 and Coordinated Integrated Monitoring Program Data Collected from November 2015 through June 2018)

Waterbody	Number of Samples						
	2013	2014	2015	2016	2017	2018	Total
Burbank Western Channel	5	8	6	4	4	2	29
Compton Creek	4	8	3	4	4	2	25
LA River Reach 2	5	8	6	4	4	2	29
LA River Reach 3	9	16	12	7	9	4	57
LA River Reach 4	6	8	6	4	4	2	30
LA River Reach 5	5	8	6	4	4	2	29
LA River Reach 6	5	8	6	4	4	2	29
Rio Hondo	0	0	0	0	2	2	4
Tujunga Wash	4	8	6	4	5	2	29
Total	43	72	51	35	40	20	261