



Engineering and Building
Services Department

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

Building 310 318-0636
Engineering 310 318-0661
fax 310 374-4828

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Song Her, Clerk of the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Re: Comments COP Modeling Monitoring
Amendments to the Standard Monitoring Procedures (Appendix III) of the
California Ocean Plan

Dear Ms. Her:

Unfortunately, it appears that the notice distributed on the above referenced matter was not issued to Redondo Beach. A third party forwarded the notification to us after the fact. Because we did not receive the workshop meeting notice, we did not attend the workshop. As such, we were not fully briefed on this matter, and were unable to provide any oral comments. I request that as the primary contact for the City of Redondo Beach on stormwater quality issues, I be added to any list that is used for distributing any future notices of meetings that cover issues relating to stormwater quality.

Based on my review of the proposed draft, the City has significant concerns and offers the following comments:

- The City of Redondo Beach, along with the cities of Manhattan Beach, Hermosa Beach, and Torrance, participate in a Coordinated Shoreline Monitoring Plan (CSMP) as part of the Santa Monica Bay Beaches Bacteria TMDL (SMBBB TMDL). This plan was approved by the Los Angeles Regional Water Quality Control Board (Regional Board) on April 28, 2004. The CSMP was developed in accordance with the SMBBB TMDL, and specifies that monitoring be conducted weekly. Of the 68 monitoring stations identified in the CSMP, the four agencies are financially responsible for monitoring seven stations, and indirectly responsible for four more stations via the County of Los Angeles. This represents 16.2% of the total site. However, these cities only occupy 2.5% of the land area that drains to the Santa Monica Bay. The total annual cost of this program is over \$44,000. If these amendments to the Ocean Plan are approved, these costs could increase to

over \$220,000. The City of Redondo Beach is financially responsible for approximately one third of these costs. This represents an unfunded mandate of significant proportions, and would affect our ability to implement plans to improve water quality as well as our efforts to provide other critical services to our citizens.

- In the materials that were provided via the State Board's website, there is no documentation that explains the benefits of this change. In the development of the SMBBB TMDL, the Regional Board deliberated this issue and determined that weekly monitoring would be sufficient for purposes of showing compliance with the requirement of the Basin Plan. This change would be contrary to the Regional Board's determination, and again would affect our efforts to improve water quality and other services provided by the City of Redondo Beach to our citizens – without any apparent benefit to the community.
- The outreach effort that was conducted for this amendment did not reach a sector of the affected community that could be greatly impacted by the proposed change. Before such a significant mandate is imposed on these agencies, a more expansive outreach effort needs to be undertaken. Therefore, I would request that the action by the State Board be delayed until additional outreach workshops are held.
- The revisions in the plan for "Effluent Monitoring, Bacteria – Non-Storm Water Point Sources" would appear to be tailored more for POTWs versus MS4s. However, the language does not provide for any differentiation. The terms "10 MGD," "one nautical mile of shoreline," and "one nautical mile of a commercial shellfish bed," are all closely related to POTWs. It would appear that POTWs are the focus of this section. But, because MS4s have non-stormwater discharges, without clarification, it could also be interpreted to apply to MS4s. I request that the language of this section be modified to explicitly exclude MS4s from its provisions.

Thank you for the opportunity to comment on this matter. Regrettably, as I stated previously, I was not aware of the efforts of the State Board to change these Ocean Plan elements until a very late date. For this reason, my comments are being issued without knowing the full basis for this recommendation.

In conclusion, the City of Redondo Beach requests that the proposed changes not be submitted to the State Water Resources Control Board for consideration until the impacts and benefits of the proposal have been fully evaluated. I would hope that additional time is afforded to the process so that I can be fully informed.

Sincerely,



Michael Shay, Principal Civil Engineer

CC: Steve Huang, Director of Engineering & Building Services