



Palos Verdes Peninsula Subwatershed (Jurisdictional Group 7)

May 7, 2012

losangeles@waterboards.ca.gov

Sam Unger, P.E. Executive Officer
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles California 90013

Comments for the
Cities of

Attention: Man Voong

**Subject: "Comment Letter – Bacteria TMDLs Revisions."
Removal of Sampling Point SMB 7-7
for Safety Reasons**

Dear Mr. Unger:

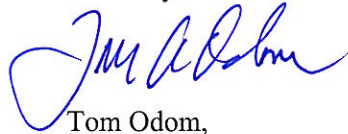
Los Angeles
Palos Verdes Estates
Rancho Palos Verdes
Rolling Hills
Rolling Hills Estates

Through an agreement described in the Santa Monica Bay Beaches Bacteria (SMBBB) TMDLs Coordinated Shoreline Monitoring Plan, the Sanitation Districts of Los Angeles County (Sanitation Districts) has been conducting the weekly compliance monitoring for Jurisdictional Group 7 at nine locations (see attached map) since the onset of the monitoring program. Sampling point SMB 7-7 is located along a rocky section of the shoreline at the end of a dirt road (see attached aerial photo). In December 2009, Los Angeles County closed the dirt access road due to safety concerns unrelated to the bacteria monitoring program. The Sanitation Districts were forced to access the wave wash sampling point via a long trek over the rocky shoreline. As a result, sampling personnel sustained injuries on more than one occasion. The Sanitation Districts has not monitored SMB 7-7 since the road was closed. Since then, the area immediately adjacent to the SMB 7-7 shoreline monitoring location has experienced a landslide that eliminated the dirt access road, a large section of the paved road, and a 900 foot section of the paved road has been closed indefinitely (see center of attached aerial which photo clearly shows landslide). This road closure eliminates an easily accessible entry point to the shoreline and thus reduces the potential for exposure to the public at this point.

Jurisdiction 7 is requesting that the SMB 7-7 monitoring location be permanently removed from the monitoring program for safety reasons. As the monitoring results show bacteria levels of the Jurisdiction 7 sampling points continue to be lower than the reference beach and that all the Jurisdiction 7 monitoring sites are subject to anti-degradation provision, there is no need to select a substitute monitoring location.

Thank you for your consideration in this matter. Please contact me if you have any questions.

Sincerely

A handwritten signature in blue ink, appearing to read "Tom Odom". The signature is fluid and cursive, with a large initial "T" and "O".

Tom Odom,
Director of Public Works
City of Rancho Palos Verdes, Lead Agency for Jurisdiction 7