



*"To enrich lives through effective and caring service"*



**Santos H. Kreimann**  
Director

**Kerry Silverstrom**  
Chief Deputy

September 13, 2010

Mr. Sam Unger, P.E.  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th St, #200  
Los Angeles, CA 90013

Attention Ms. Stefanie Hada

Dear Mr. Unger:

**COMMENTS OF THE COUNTY OF LOS ANGELES ON THE PROPOSED  
SANTA MONICA BAY DEBRIS TOTAL MAXIMUM DAILY LOAD**

Thank you for the opportunity to comment on the proposed Santa Monica Bay Debris Total Maximum Daily Load (TMDL). The Los Angeles County Department of Public Works (DPW), on behalf of the County and the Los Angeles County Flood Control District, has submitted two separate comment letters in response to the proposed "Santa Monica Bay Nearshore and Offshore Debris TMDL". In the letter submitted on behalf of the County, DPW states in pertinent part the following: "The TMDL imposes new obligation on municipal stormwater permittees. These obligations are in addition to the new obligations imposed by this Regional Board on the municipal stormwater permittees this year under the other TMDLs adopted by this Board, as well as the ongoing obligation imposed on municipal stormwater permittees under prior TMDLS. The new obligations imposed by this TMDL are imposed without regard or discussion of the source of funds for these TMDL obligations. In light of the state budget crisis and the budget issues faced by the municipalities in Los Angeles County, the Regional Board should not impose new programs that are going to place additional financial burden on municipality stormwater permittees. Accordingly, all obligations imposed on the municipal stormwater permittees under this proposed TMDL should be deferred for at least one year. With this deferral, the submission of the Trash Monitoring and Reporting Plan (TMRP) should not be required until eighteen months from the TMDL's effective date. All other subsequent dates should likewise be extended by one year. In addition, the TMDL should provide that the dates can be further extended should be municipalities lack funding to implement these programs."

The Department of Beaches and Harbors concurs with the foregoing and has additional comments on your staff report as follows:

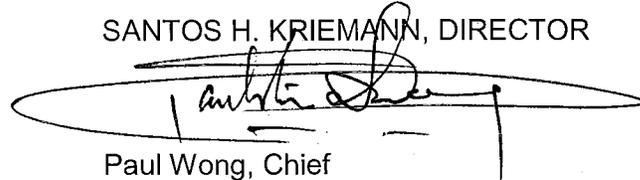
1. Page 12: The title of Figure 4 is incorrect; it should be revised to read Beaches Owned or Operated by Los Angeles County (the Department of Beaches and Harbors does not by itself own any beaches). In addition, the map used in Figure 4 is out of date. We will provide a revised map for your use.
2. Page 30: The first paragraph mentions that there will be a trash component included in the proposed Statewide Marina General Permit. We are not certain if this is in reference to the often discussed "Coastal Marinas Permit". We understood that a trash component would *not* be a part of such a coastal marina permit and the County's comments are, therefore, predicated on that basis. We reserve the right to revise our comments should this Debris TMDL be linked to any other permit requirements.
3. Pages 45 and 47: Both figures on these pages are labeled as Figure 7, but they show different data. One should be re-labeled in correction.
4. Page 48: The first paragraph states "The MFAC/BMP program shall include collection and disposal of all trash found on the shoreline and parking lots, or in areas close enough in proximity to the Santa Monica Bay such that wind or stormwater runoff may carry the trash into the bay". We suggest it be modified to state "The MFAC/BMP program shall include collection and disposal of all trash found on the shoreline and beach parking lots, or in areas close enough in proximity to the Santa Monica Bay, such that wind or stormwater runoff may carry the trash into the bay".
5. Page 75, Table 22: The "MFAC Description" column indicates assessment once per year per beach. Of all the beaches operated and maintained by the County only 10 are of the size suitable for any monitoring regimen. Further, the staff report underestimated the cost of monitoring 12 beaches per year, which is impractical from a logistic point of view as well as from a financial perspective as we will explain below. Accordingly, the County requests that no more than three to four beaches are monitored each year.
6. Page 76: Table 24 is cut off of the page.
7. Page 76: Table 23 needs to be corrected; the "Total Hours/Yr" figure for Los Angeles County Department of Beaches and Harbors should be 5,900, not 3,628 ( $5,456 + 444 = 5,900$ ). In addition, the \$37.50 per hour labor cost used to calculate the cost for compliance with this monitoring regime does not reflect the County's true cost. The proposed work needs to be administered by a District Manager whose hourly cost is \$96.46. This increases our projected annual compliance cost to \$569,114 ( $5,900 \times \$96.46$ ), not \$221,250 as indicated in the staff report. The County believes that three to four "Compliance Assessments" per year and a similar number of "Afternoon Evaluations" each year to be conducted on the most popular beaches should yield adequate data to gauge the cleanliness of all County-owned or operated beaches, as the cleaning procedure for every beach is based on the same training procedure and manual, allowing the County to continue to direct its resources to conduct actual beach cleaning work to benefit the public.

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We look forward to your consideration of these comments. If you have any questions, please contact me at (310) 305-9533 or [pwong@bh.lacounty.gov](mailto:pwong@bh.lacounty.gov).

Very truly yours,

SANTOS H. KRIEMANN, DIRECTOR

A handwritten signature in black ink, appearing to read "Paul Wong", is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

Paul Wong, Chief  
Planning Division