



City of Hermosa Beach

Civic Center, 1315 Valley Drive, Hermosa Beach, California 90254-3885

September 13, 2010

California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013
Attn: Stefanie Hada

Subject: Proposed amendment to Water Quality Control Plan for the Los Angeles Region (Basin Plan) to incorporate a Total Maximum Daily Load for Debris in the nearshore and offshore of Santa Monica Bay (Marine Debris TMDL)

Dear Mr. Unger, Ms. Hada and Dr. Wu:

The City of Hermosa Beach is a small, historic beach town that fronts two miles of popular beaches and is home to approximately 18,000 residents. As a coastal city focused on surfing and other ocean-oriented, family friendly activities as well as tourism, maintaining high water quality is an important issue for the City of Hermosa Beach. The City's residents are strongly supportive of proactive environmental measures and actions to protect water quality and the environment. City staff is innovative, progressive and strongly committed to protecting water quality. The City of Hermosa Beach shares the concerns of the Los Angeles Regional Water Quality Control Board that trash and debris in the Santa Monica Bay, whether in near shore or offshore areas, or on the beach are a nuisance and a hazard to human health and marine life.

Although the City is not currently subject to a trash TMDL, a number of measures are in place in addition to those required in the MS4 Permit to control the generation of trash within the City, including:

- Debris excluders have been installed on 35 high priority catch basins in the City's commercial district, along Hermosa Avenue and Pier Avenue. This has reduced the accumulation of trash and debris in the catch basins and the frequency of required catch basin cleaning. The debris excluders also increase the effectiveness of street sweeping—a study conducted by the City found that on average 2.73 tons per week of material is removed from the City's streets via street sweeping within the commercial area.
- The City has installed Drain Pac® inserts on 31 City-owned catch basins plus an additional 10 County-owned basins. The City cleans both the City-owned catch basins and the ten County-owned basins equipped with Drain Pac®.
- The Pier Avenue Improvement project which is currently under construction is designed as a full-capture system for trash. This project retrofits an existing, intensely developed coastal area to capture and treat stormwater/urban runoff from residential areas and commercial development in the downtown corridor along Pier Avenue (36-acre drainage area). This multi-benefit project includes drainage improvements for treatment and infiltration of dry and wet-weather flows up to the one-year, one-hour design storm to

reduce pollutant loading at the beach to meet dry- and wet-weather Bacteria TMDLs, the pending Marine Debris TMDL and to reduce local flooding.

- The City of Hermosa Beach has this year instituted a Green Matrix of requirements for special events in the City. The requirements are phased in over three years and are tiered based on the size of the event. The requirements include measures to:
 - Reduce waste and single-use items
 - Limit and reduce the size of handouts and flyers
 - Control litter, contain wastes and prohibit hosing of surfaces
 - Increase recycling and solid waste diversion rates
 - Provide educational outreach to the public

The City of Hermosa Beach is fully prepared to undertake additional measures necessary to achieve the objectives of the Santa Monica Bay Marine Debris TMDL in order to protect our storied beaches.

While we are supportive of measures that are effective in controlling pollutants discharged to the Santa Monica Bay, we urge you to consider whether all of the requirements in this TMDL are reasonable, appropriate and practical for achieving the TMDL objectives. Monitoring and reporting when it is inappropriate or unnecessary places an undue burden on municipalities' already strained budgets.

The City is particularly concerned with the requirement that all municipalities subject to the TMDL must prepare not only a Trash Monitoring and Reporting Plan, but also a Plastic Pellet Monitoring and Reporting Plan, and that we will be required to somehow monitor the amount of plastic pellets discharged from the MS4 regardless of whether there is any industrial activity involving plastic pellets conducted within the City. To monitor for plastic pellets in the City's storm drain discharge when there is no industrial activity involving plastic pellets within the City would be a fruitless endeavor and a waste of scarce public funds which could be more effectively utilized for actual pollution control. Furthermore, if no industrial activity involving plastic pellets exists within a municipality, the likelihood that a plastic pellet spill would occur via truck transport is extremely remote since there would be no destination for such delivery within the municipality. The spill response provisions of the City's existing Illicit Connection and Illicit Discharge Elimination Program will readily address a spill of plastic pellets in the unlikely event that an errant delivery truck carrying plastic pellets were to overturn within the city, so a separate monitoring and reporting plan is unnecessary for such purpose.

The City of Hermosa Beach respectfully requests that a provision be included in the Santa Monica Bay Marine Debris TMDL for responsible jurisdictions to waive the requirement for a Plastic Pellet Monitoring and Reporting Plan if we can demonstrate to the satisfaction of the Regional Board Executive Officer that there is no industrial activity within the City involving plastic pellets.

The City appreciates your consideration of our concerns.

Sincerely,



Richard D. Morgan, P.E.
Director of Public Works