



City of Manhattan Beach

Public Works Department

Phone: (310) 802-5300

FAX: (310) 802-5301

TDD: (310) 546-3501

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 Manhattan Beach fronts 2.1 miles of southern California beaches with a scenic 928-foot long fishing pier. There are 48 acres of parkland in addition to the 21-acre Manhattan Beach Parkway in the 3.88 square mile city. According to the 2000 census, approximately 34,000 people reside in Manhattan Beach. As a coastal city focused on surfing and beach-oriented recreational activity, maintaining high water quality is very important to its residents and City officials. The City of Manhattan 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. In July 2008 the Manhattan Beach City Council passed an ordinance banning the distribution of plastic bags at the point-of-sale for all retail establishments. This ban is currently on hold due to a lawsuit brought by the "Save the Plastic Bag Coalition."

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:

- Ten (10) CDS gross pollutant separators have been installed within the City. Nine (9) of these are publicly owned and maintained, and one is privately owned and maintained.
- The City of Manhattan Beach has invested Used Oil Block Grant funds in the purchase of debris screens for storm drains, placing them on catch basins that have historically required frequent cleaning (Priority A). A total of 62 debris screens have been installed to date. These screens have significantly reduced trash deposited into catch basins and frequency of catch basin cleaning but more importantly reduced discharge of trash and debris to the ocean.
- When installing trash cans in municipal parks and the public right-of-way, the City utilizes cans with lids—usually the type with a small hole in the center that allows the user to deposit trash but prevents trash from being blown out of the trash can by wind and also deters birds and other animals from spreading trash.

- The Manhattan Pier is swept and cleaned 7 (seven) days a week and includes deck sweeping, litter pick up, and chewing gum removal.
- Trash receptacles on the Pier and pier parking lots are emptied as frequently as required, 7 (seven) days a week.
- Municipal parking lots are maintained a minimum of twice a week and include manual policing of trash and debris, and hand sweeping as required. Trash receptacles are serviced and inspected three times weekly for liners, lids, damage, etc.
- The Strand detailing includes weekly mechanical or hand sweeping. Included with the sweeping is hand detailing/sweeping of the dead end streets that intersect The Strand, all catch basin inlets, and beach access stairwells. In addition to the sweeping detail, trash receptacles are cleaned and inspected twice weekly (Monday and Friday).

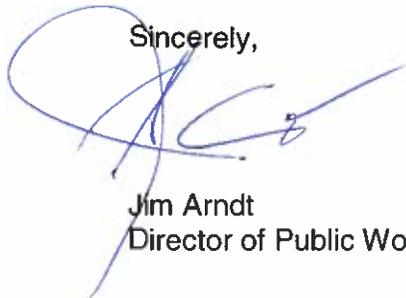
The City of Manhattan Beach is fully prepared to undertake additional measures necessary to achieve the objectives of the Santa Monica Bay Marine Debris TMDL in order to protect our beautiful beaches and marine life. And while we are supportive of measures that are effective in controlling pollutants discharged to the Santa Monica Bay, we are concerned that some of the requirements are unnecessary and place 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 Manhattan 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,



Jim Arndt
Director of Public Works