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THE CITY OF
ROLLING HILLS ESTATES

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September 10, 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 Rolling Hills Estates is a contract city of approximately 8,000 residents with a small full-time staff. The City encompasses 4.2 square miles on the Palos Verdes Peninsula with less than a one-half square mile located within the Santa Monica Bay Watershed. The City is predominantly single-family detached residential zoning, with a small commercial district and very little industrial zoning. The City has a significant amount of dedicated open space including six parks and 25 miles of equestrian trails. Significant portions of the City's drainage system consist of natural, unimproved, canyons. The City has dedicated the George F Canyon Nature Center and Stein-Hale Nature Trail as a riparian preserve for public enjoyment with both passive and active education programs. We have partnered with the Palos Verdes Peninsula Land Conservancy in the preservation and restoration of coastal sage habitat and the endangered Palos Verdes Blue Butterfly at the Linden S. Chandler Preserve and at George F Canyon Nature Preserve.

The City of Rolling Hills Estates is a pristine community with strong policies and ordinances that mandate clean streets, residences, and commercial areas. The City is dedicated to preserving open space, public trails and native habitat and in general the community has a high level of environmental awareness. The City of Rolling Hills Estates shares the concern 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, are a nuisance and a hazard to human health and marine life.

The City is already implementing a Trash Monitoring and Reporting Plan in accordance with the Machado Lake Trash TMDL. The City has issued a contract to a consultant to develop a prioritization for installation of full capture devices, which is to be submitted to Regional Board staff in December 2010. During FY10-11 the City's consultant will also prepare contract documents for the installation of the first 20% of the full capture devices. Even without the full capture devices the City believes that measures taken to date have already significantly reduced the City's trash generation rate well below the baseline listed in the Regional Board's staff report. These measures include:

- The City has very high standards for cleanliness and conducts routine manual trash pickup in public rights-of-way. Litter is removed from parks and trash cans are emptied on a daily basis.
- Contracts with youth sports organizations include provision for litter clean up. Litter control at public events is handled by the entity sponsoring the event and in most cases these organizations do a very good job with litter control. If any litter problems remain, they are cleaned up by City Maintenance Department and the sponsoring organization is billed for the cleanup.
- The City's residential solid waste service requires use of automated carts with hinged lids that prevent wind-blown and vector scattering of trash or green waste prior to collection.
- The City contracts for street sweeping at least twice per month throughout the entire City.
- The City has placed recycling bins for beverage containers in city parks with particular emphasis on parks with playing fields that are heavily utilized for youth sports programs.

The City of Rolling Hills Estates is fully prepared to undertake additional measures necessary to achieve the objectives of the Santa Monica Bay Marine Debris. And 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 Marine Debris 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. The likelihood that a plastic pellet spill would occur on our streets via truck transport is extremely remote since there is no destination for such delivery within our City or our sister cities on the Palos Verdes Peninsula. Due to the geographic location of the Palos Verdes Peninsula, trucks do not typically pass-through on their way to other destinations, and there are no rail lines on the Peninsula.

The City of Rolling Hills Estates 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,

A handwritten signature in black ink, appearing to read 'G. Grammer', written over a horizontal line.

Greg Grammer
Assistant to the City Manager