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CITY OF

ROLLING HILLS ESTATES

4045 PALOS VERDES DRIVE NORTH • ROLLING HILLS ESTATES, CA 90274
TELEPHONE 310.377.1577 FAX 310.377.4468
RollingHillsEstatesCA.gov

March 27, 2017

Samuel Unger, P.E., Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Via email: losangeles@waterboards.ca.gov

Attn: Jun Zhu, Environmental Scientist (jzhu@waterboards.ca.gov)

Subject: Comment Letter—Revisions to the Los Angeles Region 303(d) list

Dear Mr. Unger:

On February 8, 2017, the Los Angeles Regional Water Quality Control Board (Regional Board) issued a 30-day Notice of Public Hearing and Opportunity to Comment on the Proposed Revisions to the Clean Water Act Section 303(d) List for the Los Angeles Region and the 2016 Integrated Report. On February 24, 2017, the Regional Board issued a Notice of Extension of Comment Deadline with a revised comment deadline of March 30, 2017 and the public hearing scheduled for May 4, 2017. The City of Rolling Hills Estates respectfully submits the attached pollutant/water body-specific comments on the proposed revisions to the 2016 Section 303(d) and 305(b) Integrated Report for consideration by the Regional Board.

The City is pleased that that Palos Verdes Peninsula beaches are being proposed for delisting for indicator bacteria. This is also consistent with Regional Board Resolution No. 2006-008 reviewing the Implementation Plan submitted by Jurisdictional Group 7 for the Santa Monica Bay Beaches Bacteria Wet Weather TMDL which noted that “Palos Verdes Peninsula have had historically fewer exceedances than the reference beach”. and “. . . existing water quality is equivalent to compliance with the Santa Monica Bay Beaches Wet Weather TMDL.”¹

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Grammer", is written over a horizontal line.

Greg Grammer
Assistant City Manager

Attachment

Copies: Dr. L.B. Nye (LB.Nye@waterboards.ca.gov)

¹ California Regional Water Quality Control Board – Los Angeles Region, Resolution No. 2006-008

City of Rolling Hills Estates Comments on Proposed Revisions to 303(d) List

Water Body/Pollutant	Comment	Recommendation
Los Angeles-Long Beach Inner Harbor/Zinc	We are in agreement with Decision ID 33644 LARWCB staff recommendation to delist the water body both due to flaws in the original listing and because applicable water quality standards are not being exceeded this recommendation, however Appendix A does not reflect this proposed change.	Add a "Y" in the New Delistings column in Appendix A for Zinc in Los Angeles-Long Beach Inner Harbor.
Wilmington Drain/Lead	We are in agreement with Appendix G Decision ID 35085 to delist the Wilmington Drain for lead based on the weight of evidence. Additionally, the weight of evidence is stronger than indicated because data was included in this fact sheet from Compton Creek. LOE 90133 included in Fact Sheet 35085 describes data collected in Compton Creek which is unrelated to the Wilmington Drain.	Remove LOE 90133 from Fact Sheet 35085 and revise the supporting evidence statement to the Regional Board Staff Conclusion to state that "0 of 33 samples exceeded the CRITERIA."
Wilmington Drain/Copper	The Appendix G Decision ID 44676 regarding copper in Wilmington Drain includes a data set that should not have been included: LOE ID 90473 describes data collected in Compton Creek which is unrelated to Wilmington Drain. Removal of this data set from Decision ID 44676 would still leave LOE ID 90131 which is described as 33 samples, only two (2) of which exceeded the criteria for copper. This revised data set now meets the SWRCB Delisting criteria because the number of exceedances is 2 or less in a data set size of 28-36 samples.	Remove LOE ID data set 90473 from Decision ID 44676 and revise the recommendation to Delist from 303(d) List.
Machado Lake/Algae, Ammonia, Chema, Eutrophic, Odor, Trash	These listings for Machado Lake are included in Appendix B Category 5 (a water segment where standards are not met and a TMDL is required but not yet completed) however all of these	These listings should be moved to Category 4a in Appendix C. An explanation that "TMDL status changed from TMDL still required to Being Addressed by Completed TMDL" should be

Water Body/Pollutant	Comment	Recommendation
	pollutant listings are being addressed by USEPA-approved TMDLs.	included in Appendix A under the “Other Revisions” column for each of these pollutants in Machado Lake.
Los Angeles-Long Beach Outer Harbor (inside breakwater)/DDT, PCBs and Toxicity; Los Angeles Harbor Inner Cabrillo Beach/DDT, PCBs; San Pedro Bay Near-Off Shore/Chlordane, PCBs, Total DDT, and Toxicity	These are included in Appendix B Category 5 (a water segment where standards are not met and a TMDL is required but not yet completed) however all of these listings are being addressed by the USEPA approved TMDL for Dominguez Channel and Greater Los Angeles and Long Beach Harbors. These changes are explained in Appendix A summary under “other revisions”.	These listings for DDT, PCBs and Toxicity should be moved to Category 4a in Appendix C.
San Pedro Bay Near-Off Shore Zones/Zinc	Appendix G Decision ID 42798 to Delist San Pedro Bay Near/Off Shore Zones for Zinc because applicable water quality standards are not being exceeded. This recommendation is not reflected in Appendix A summary of recommended changes.	Insert a “Y” in the New Delistings column of Appendix A for San Pedro Bay Near/Off Shore Zones for zinc.
San Pedro Bay Near-Off Shore Zones/Chromium	Appendix G Decision ID 42525 restates and does not revise the original recommendation to delist San Pedro Bay Near/Off Shore Zones for Chromium, however delisting does not seem to have occurred since the pollutant-waterbody combination still appears in Appendix A.	Insert a “Y” in the New Delistings column of Appendix A for San Pedro Bay Near/Off Shore Zones for PAHs and remove the “Y” from the Pollutant Name Changes column since there does not appear to have been any name change made for this pollutant.
San Pedro Bay Near-Off Shore Zones/Copper	Appendix G Decision ID 44434 to Delist San Pedro Bay Near/Off Shore Zones for Copper based on flaws in the original listing. This recommendation is not reflected in Appendix A summary of recommended changes.	Insert a “Y” in the New Delistings column of Appendix A for San Pedro Bay Near/Off Shore Zones for copper.
San Pedro Bay Near-Off Shore Zones/Polycyclic Aromatic Hydrocarbons (PAHs)	Appendix G Decision ID 43259 to Delist San Pedro Bay Near/Off Shore Zones for PAHs because applicable water quality standards are not being exceeded. This recommendation is not	Insert a “Y” in the New Delistings column of Appendix A for San Pedro Bay Near/Off Shore Zones for PAHs.

Water Body/Pollutant	Comment	Recommendation
	reflected in Appendix A summary of recommended changes.	
Santa Monica Bay Offshore-Nearshore/Chlordane	The revised Appendix G Fact Sheet associated with Decision ID 37492 recommending delisting Santa Monica Bay Offshore-Nearshore waters for chlordane is not reflected in the Appendix A summary of recommended changes.	Revise Appendix A to place a “Y” in the New Delisting column for Santa Monica Bay Offshore/Nearshore line for Chlordane.
Santa Monica Bay Offshore-Nearshore/Polycyclic Aromatic Hydrocarbons (PAHs)	The revised Appendix G Fact Sheet associated with Decision ID 32656 recommending delisting Santa Monica Bay Offshore-Nearshore waters for PAHs is not reflected in the Appendix A summary of recommended changes.	Revise Appendix A to place a “Y” in the New Delisting column for Santa Monica Bay Offshore/Nearshore line for PAHs.
Santa Monica Bay Offshore-Nearshore/Arsenic	Santa Monica Bay Offshore-Nearshore areas are being proposed for listing for Arsenic based on sampling conducted for the City of Los Angeles Hyperion Wastewater Treatment Plant NPDES Permit. Samples were collected during August 2006, October and November 2007, and August through September of 2007 from nearfield and from Zones 4 & 5—these sampling areas are north of Redondo Beach Pier.	This listing should be narrowed in geographic scope and should exclude Offshore-Nearshore waters of the Palos Verdes Peninsula because the data supporting the listing is not spatially representative of the Palos Verdes Peninsula waters since there is little to no influence from the Hyperion Wastewater Treatment Plant discharge on these waters. The fact sheet (Decision ID 67208) should be revised to discuss the spatial extent of this listing in relation to the data supporting the listing and to exclude areas south of Redondo Beach Pier which are outside of Zones 4 and 5.
Santa Monica Bay Offshore-Nearshore/Mercury	Santa Monica Bay Offshore-Nearshore areas are being proposed for listing for Mercury based on sampling conducted for the City of Los Angeles Hyperion Wastewater Treatment Plant NPDES Permit. Samples were collected during August 2006, October and November 2007, and August through September of 2007 from nearfield and from Zones 4 & 5.	This listing should be narrowed in geographic scope and should exclude Offshore-Nearshore waters of the Palos Verdes Peninsula because the data supporting the listing is not spatially representative of the Palos Verdes Peninsula waters since there is little to no influence from the Hyperion Wastewater Treatment Plant discharge on these waters. The fact sheet should

Water Body/Pollutant	Comment	Recommendation
		be revised to (Decision ID 67209) discuss the spatial extent of this listing in relation to the data supporting the listing and to exclude areas south of Redondo Beach Pier which are outside of Zones 4 and 5.