

**Carol A. Gross, Council Member
City of Culver City**

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Sent via e-mail to: commentletters@waterboards.ca.gov
Song Her, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Re: Ballona Creek Bacteria TMDL

Dear Ms. Her:

As a City Council Member in Culver City, I am very supportive of the Board's work to clean up the waters of Ballona Creek and the resulting pollution of the Santa Monica Bay beaches. This will greatly affect the use of these waters by both humans and wildlife as well as the surrounding economic and recreational uses. However, I am writing to you out of concern about the extreme difficulties we will encounter in trying to comply with the proposed TMDL requirements.

First, let me tell you some of what we have done as a city. Over recent years, we have videotaped all our sewers in order to identify and correct areas of cracking, root intrusion, or other weaknesses that could result in seepage into the ground water. To address these problems we have instituted an extensive capital improvement program to replace aging and deteriorated sewer lines throughout the City averaging approximately \$1.5 million per year. Additionally, we continue to upgrade our pump stations and have significantly improved our emergency notification system to provide immediate notice of a problem 24/7. Meanwhile, we are evaluating means to eliminate current pumps, with their inherent potential risk of failure, from our system as much as possible. We clean our catch basins annually, utilize inserts to catch and remove trash, and conduct a large annual Ballona Creek clean-up annually. This is but one part of our educational program for both children and adults.

Additionally, we recently installed a CDS unit to help remove trash from stormwater before it enters the creek. We inspect businesses for improper discharges, illegal sewer connections, and poor cleaning practices. Newly revised regulations for new or refurbished buildings demand filtration of all storm water before leaving the site. We have applied for and received a Prop 50 grant that will enable the City to implement a

number of storm water treatment technologies throughout the City such as additional catch basin inserts, low volume brooms for sidewalk cleaning, green roofs, bioswales and other rain retention systems. Finally, we continue to work to expand the availability and use of re-cycled water.

But, we worry about our ability to comply with the bacteria TMDL. While Culver City encompasses only 3.9% of the Ballona Creek Watershed, virtually all the flow from the entire watershed passes through the creek in our city. That brings to us endless contaminants from a large land area that we do not control. Bacteria found in testing of our waters cannot be identified as to where they originated, so we become the responsible party. We are the stem of the funnel for waters of the whole area.

Seemingly, the only effective means of removing the bacteria from this stormwater flow is via a water treatment plant, or the use of wetlands and swales. We not only lack the funds for either of these alternatives, as a built out city, we have no land area available on which to construct such treatment means without destroying current homes and businesses. Additionally, while dry weather flow is small, but continuous, the wet weather flow is an unbelievably huge torrent of very fast moving water. (We estimate that the wet weather flow averages approximately 17,000 cubic feet per second.) We do appreciate the Board's inclusion of some provisions that acknowledge the different issue of wet weather flow, but it remains a difficult and very complex problem.

We look forward to working with the Board on the development and testing of ever improving Best Management Practices in order to address these complicated issues. It is our hope that, until more effective and practical measures are available to us, the Board will devise a system whereby implementation of a set of Best Management Practices will be regarded as being in compliance, even if testing results remain out of compliance. We also hope that the Board will aid us in identifying and obtaining the large funding necessary to address these important issues.

We appreciate all the hard work the Board is doing to address the condition of our local waterways. We look forward to continuing to work together towards the development of practical, effective, and economical means of addressing the current pollution problems.

Thank you for the opportunity to provide comment to you. Please feel free to contact me at any time.

Sincerely yours,

Carol Gross, Council Member
City of Culver City