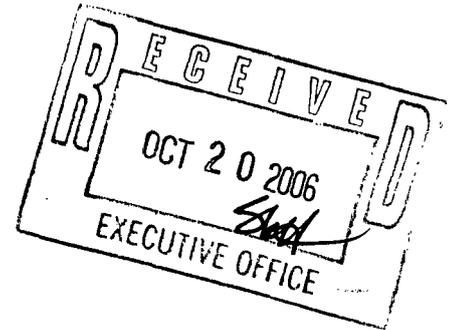



CITY OF RANCHO PALOS VERDES
PUBLIC WORKS DEPARTMENT

818

October 17, 2006

Tam M. Doduc, Board Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100



Attention: Song Her, Clerk to the Board

Subject: Proposed 2006 Federal Clean Water Act Section 303(d) List

The City of Rancho Palos Verdes, as a coastline city, has always worked to provide its residents with a safe and aesthetically pleasing environment. We have reviewed the proposed 303(d) list, which identifies water bodies that are impaired by pollutants. The proposed listing has now been divided into two sections; one for impairments that already have TMDLs established and a second list for impairments for which TMDLs have not yet been established.

Previously, several Rancho Palos Verdes beaches were listed as impaired for "beach closures". In January of this year, the City requested this impairment be removed and we see that it has appropriately been removed, as beach closures are not a pollutant. However, we were surprised to see that this designation has been replaced with a listing for impairments due to bacterial levels.

Shoreline sampling has repeatedly shown that the bacteria levels along the Rancho Palos Verdes (and in fact the entire Palos Verdes Peninsula) have historically been low. In fact, the bacteria levels along our beaches are well below the reference beach for the Santa Monica Bay Beaches Bacteria TMDLs as the baseline for natural (undeveloped) beaches. Every month, the most current sampling results, which are conducted on a weekly basis, are submitted to the Los Angeles Regional Water Quality Control Board by the Sanitation Districts of Angeles County. If bacteria levels along our shoreline are below those of natural beaches, it is difficult to understand how those beaches can be defined as "impaired".



According to Table 4.2 (page 15) of the "Water Quality Control Policy for developing California's Clean Water Act Section 303(d) List, adopted in 2004:

A delisting should occur if there are less than 8 exceedances in 49 to 54 samples (which is the case).

By way of this letter, the city requests the beaches along the City of Rancho Palos Verdes (and other peninsula beaches) be removed or delisted from either 303(d) list for bacterial levels. Please be assured that the city will not use any delisting as an opportunity to "backslide" but will continue to aggressively protect the quality of its beaches as the city has always done in the past.

Please call me in you have any questions.

Sincerely,



Jim Bell
Director of Public Works.

January 16, 2006

Tam Doduc, Chair and members
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, California 95814

Attention: Craig J. Wilson, Chief
Water Quality Assessment Unit

Subject: Proposed Changes to the 303d List

Dear Chair Doduc and Members:

The City of Rancho Palos Verdes would like to submit the following comment regarding the proposed amendments to the 303d list.

The Regional Board has recommended that impairments for “beach closures” along Santa Monica Bay be removed from the 303d list. The City supports that position for three reasons.

1. “Beach closures” are an action, not a pollutant.
2. The listing is duplicative. The beaches along Santa Monica Bay are already listed as being impacted for bacteria which is the underlying cause of the beach closures. A TMDL has already been adopted for bacteria along the Santa Monica Bay Beaches.
3. Regional Board staff has already devoted resources in determining that delisting should be made. Not to do so now, would simple result in Regional Board staff repeating the process at a later date as TMDL compliance takes place.

In addition the city appreciates the effort that the State and Regional boards have made in improving the overall 303d listing and delisting process and the ongoing effort to make the overall process more scientific and statistically sound.



Subject: Proposed Changes to the 303d List
January 16, 2006
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Please do not hesitate to call me if you have any questions.

Sincerely,

Jim Bell
Director of Public Works

c: John Hunter, John L. Hunter & Associates