



**Bill Brand**  
Mayor

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Dear Members of the Los Angeles Regional Water Quality Control Board;

The City of Redondo Beach appreciates the standards the Los Angeles Regional Water Quality Control Board holds to protect the quality of our coastal waters. All have benefited from the cooperative relationship our two agencies have shared to administer the City's municipal stormwater and point-source discharge permits. I write to you now regarding the proposed NPDES permit and Time Schedule Order for the Seaside Lagoon, which is a "one of a kind" ocean-side recreational facility that has been in operation for more than fifty years.

The Seaside Lagoon is a regional recreational facility that is enjoyed by over 80,000 visitors each summer - most of whom are from the greater Los Angeles area. We are subsidizing this facility by over \$200,000/year and want to continue this effort while maintaining the discharge requirements set forth by the NPDES permit.

The NPDES Industrial Discharge Permit classifies this facility as an "industrial use," so it does not always account for the special operational needs of the facility. As you know, our intake is from the waters of King Harbor through a bypass from the AES power plant outfall line, which is then chlorinated to meet L.A. County Health standards. The discharge to the Harbor is then de-chlorinated to meet our NPDES discharge permit requirements. As stated above, we operate the Seaside Lagoon at significant economic loss for the recreational benefit of the region.

As part of the renewal of our NPDES permit, our City engineering staff prepared a technical comment letter that was discussed by the City Council and will be submitted to Board staff on May 5<sup>th</sup>. That letter will serve as the City's official response to the current draft Permit Order and TSO to be considered at your June 1<sup>st</sup> Meeting. This correspondence is meant to supplement that response and ask that you consider delaying some of the new requirements for about six weeks so that we can complete this summer season without interruption due to unknown impacts from additional standards and testing.

The Seaside Lagoon's summer operating season runs from Memorial Day to Labor Day. The Lagoon serves a myriad of users and is the destination for a number of preplanned activities including end-of-school-year field trips, summer camps, weddings, birthday parties, etc. It is critical that once the City markets the Lagoon for the summer, hires lifeguards and opens the facility to the public that it remain open for the full season and that the operating requirements that govern its water discharge be consistent throughout. The proposed Permit, as currently drafted, is scheduled to become effective on August 1<sup>st</sup>, approximately six weeks before the end of the season.

While we recognize the Board's need to move forward with the Lagoon's new Permit, some of the obligations in the Order may require temporary closure of the facility to implement, and if effective August 1<sup>st</sup> could jeopardize various activities scheduled in the Lagoon for the remainder of the summer. In that spirit, I ask that you please delay implementation of any new Seaside Lagoon water quality monitoring and TSO performance requirements until September 11<sup>th</sup>.

Thank you for your consideration. I will see you at your June 1<sup>st</sup> Meeting.

Sincerely,

William C. Brand