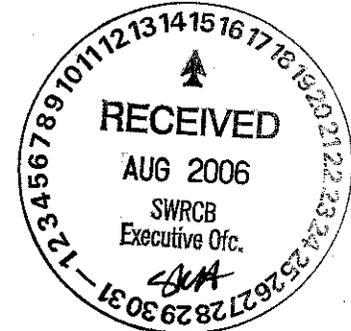




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August 15, 2006

Song Her, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100 Sacramento, CA 95812-0100



RE: Comment Letter – COP (California Ocean Plan) Model Monitoring

Dear Ms. Her, Members of the Board and staff of the Division of Water Quality,

The City of Manhattan Beach has reviewed the proposed amendment to Appendix III of the California Ocean Plan and have the following comments regarding the "Effluent Monitoring, Bacteria – Permitted Storm Water Point Sources" section.

In anticipation of the adoption of the Santa Monica Bay Beaches Bacterial (SMBBB) TMDL, a technical steering committee (which was co-chaired by the County and City of Los Angeles and had representatives from many of the SMBBB TMDL responsible agencies) formed to develop a comprehensive monitoring plan. Through two years of work the technical steering committee, with input from the Los Angeles Regional Board and the environmental community, developed the Coordinated Shoreline Monitoring Plan (CSMP). This plan was adopted by the Los Angeles Regional Board on April 28, 2004. All parties involved gave extensive consideration to many factors to determine the schedule and location for monitoring sites. Since November 2004, the responsible agencies have been conducting weekly year-round monitoring of the sites designated in the Coordinated Shoreline Monitoring Plan.

With the announcement of the proposed changes to the COP, the State Board has not provided an explanation of factors considered in suggesting monitoring 5 days a week or the benefit of this schedule as opposed to others. This suggested 5 days a week for monitoring would have a significant fiscal impact to the SMBBB TMDL responsible agencies. The responsible agencies are currently focused using available resources to identify and control sources of bacterial pollution. Any increased costs associated with monitoring would detract from this effort.

I would strongly urge that the State Board consider using language in the proposed amendments to Appendix III of the COP that would provide Regional Boards flexibility in setting monitoring schedules (based on a rigorous analytical approach as was taken for CSMP) rather than setting a standard schedule for all situations.

Thank you for the opportunity to provide comments on this matter.

Sincerely,

Neil Miller
Director of Public Works

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