

# City of Hermosa Beach

Civic Center, 1315 Valley Drive, Hermosa Beach, CA 90254-3885

August 17, 2006

COP Model Monitoring  
Deadline: 9/1/06 5pm



Ms. 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 Hermosa Beach would like to submit the following comments regarding the **Effluent Monitoring, Bacteria—Permitted Storm Water Point Sources** of the proposed Draft Amendments to the Standard Monitoring Procedures (Appendix III) of the California Ocean Plan.

State Board has not explained why it believes there is a need to establish a uniform approach for effluent monitoring of permitted storm water point sources for bacteria as opposed to other sources and monitoring parameters. Such an approach seems contrary to the Surface Water Ambient Monitoring Program (SWAMP) approach which does specify analytical protocols and sampling methodology, but leaves the details of location and frequency of sampling to the monitoring plan of each individual project. Each watershed has individual characteristics with individual data quality objectives that need to be taken into consideration in developing an effective monitoring plan as has been done in developing the Santa Monica Bay Beaches Bacteria TMDL Coordinated Shoreline Monitoring Plan.

Extensive thought, time and effort has been expended by the responsible agencies for the Santa Monica Bay Beaches Bacteria (SMBBB) TMDL and the Los Angeles Regional Water Quality Control Board staff in making decisions regarding which storm drains should be monitored, under what conditions and at what frequency under the approved Coordinated Shoreline Monitoring Plan. More than two years of coordinated effort on the part of a technical steering committee and dialog among all parties involved, in addition to regulatory review time, has been expended. Since November of 2004, the responsible agencies have been conducting regular weekly monitoring, year-round, wet-weather or dry-weather, in the wave wash at designated monitoring locations, both open beach and at the zero point of major storm drains as proscribed in the Coordinated Shoreline Monitoring Plan. The Coordinated Shoreline Monitoring Plan is available online at <http://www.ladpw.org/wmd/NPDES/beachplan.cfm> and we strongly urge the

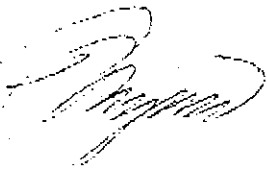
Board to review this document before taking action on this matter, giving particular attention to the methodology used in selection of monitoring sites as described in Section 3 as well as sampling schedule and procedures in Section 4 of the document.

Because the Los Angeles Regional Water Quality Control Board intends to incorporate the terms of the TMDL into the MS4 NPDES permit, the effluent monitoring requirements for bacteria applicable to permitted storm water point sources in this proposed Ocean Plan Amendment will become applicable to the Coordinated Shoreline Monitoring Plan and this will have a disruptive impact on data being collected. To increase the frequency to 5-day monitoring will be a significant increase in cost to be born by the responsible municipalities without providing a commensurate benefit to the public. Responsible agencies are currently focused on bringing fiscal and technical resources to bear on identifying and eliminating bacteria sources and conditions that incubate bacteria and on finding long-term solutions for the control of bacteria in storm water discharges and at open beaches where no apparent point sources exist.

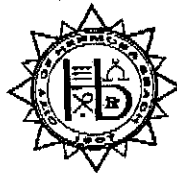
If the State Board believes that 5-day monitoring is necessary at AB 411 beaches, then it should consider waiting to promulgate such requirements until SWAMP-approved rapid response bacterial analytical protocols are available that will make daily monitoring practical and effective for protecting the health of beach-goers. Many AB 411 exceedance events are not related to storm drain outfalls but occur at open beaches, so placing these standards in effluent monitoring requirements of the Ocean Plan seems inappropriate.

Thank you for the opportunity to provide comments on this matter. We hope that the Board will carefully consider our comments.

Sincerely,



Richard D. Morgan, P.E.  
Director of Public Works/City Engineer



## City of Hermosa Beach

Department of Public Works  
1315 Valley Drive  
Hermosa Beach, CA 90254  
310/318-0214

### Fax Cover Sheet

DATE: August 17, 2006

TO: MS. SONG HER, CLERK  
TO THE BOARD

PHONE:  
FAX: 916-341-5620

FROM: RICHARD MORGAN

PHONE: 310/318-0211  
FAX: 310/937-5015

Number of pages including cover sheet: 3

#### Message

Attached is our Comment Letter regarding the California Ocean Plan Model Monitoring.