



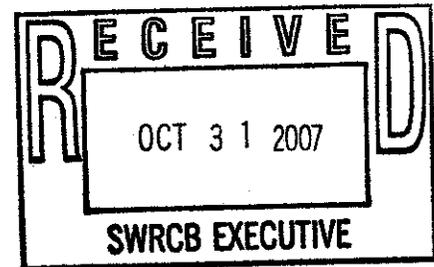
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October 31, 2007

Ms. Jeanine Townsend
State Water Resources Control Board
1001 I Street
Sacramento, California 95814



**Subject: Machado Lake Trash TMDL – Region 4
City of Redondo Beach Request for Withdrawal and/or Exemption**

Dear Ms. Townsend:

The City of Redondo Beach respectfully requests to be withdrawn and exempted from the Machado Lake Trash TMDL as adopted by the Los Angeles Regional Water Quality Control Board (Resolution R4-2007-0060). The subject TMDL document lists the City of Redondo Beach as one of the responsible agencies in this watershed. However, due to the following factors, the City does not believe it should be included:

1. The negligible amount of Redondo Beach flow that drains into the Machado Lake watershed (Table 5 of the Final Staff Report date July 11, 2007 lists the tributary area for Redondo Beach as 0.00 sq. miles);
2. The insignificant waste load allocation given to Redondo Beach (Table 5 of the Final Staff Report allocated 18.16 gallons/per year or 0.02% of total allocation); and
3. The City does not own any catch basins or storm drains that drain into the watershed.

The cost/benefit of the City being a responsible agency is significant. As such, we believe Redondo Beach should be removed from the list of responsible agencies.

Other responsible agencies, as listed in Table 5 of the staff report, are the City of Los Angeles, Caltrans, the County of Los Angeles, the cities of Carson, Lomita, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, and Torrance. The issue of this request was discussed at a group meeting where the group's consent was obtained.

The subject TMDL describes the watershed as:

"Machado Lake is a receiving body of urban and storm water runoff from the storm drain system covering an approximately 20-square mile watershed. The Wilmington Drain collects runoff from the surrounding cities of Lomita, Torrance, Carson, and Los Angeles, and then discharges over 50 percent of the watershed into Machado Lake at the northeast corner. The rest of the waters enter the lake through other storm drains including the Project No. 77 channel, the Harbor City Relief Drain located at the west end of the lake, the City of Los Angeles drains for runoff from streets, and the Harbor Park Municipal Golf Course. The Wilmington Drain Project 77 and the Harbor City Relief Drain collect storm water from the communities of Harbor City, Lomita, Carson, Torrance, and Wilmington, and from the Walteria lake drainage area. In addition, two project 648 outlets discharge to the wetlands area. During the dry season, Machado Lake is replenished via a City of Los Angeles Department of Water And Power (LADWP) potable water pipeline and dry weather runoff."

As noted above and as addressed in the TMDLs, the City of Redondo Beach has no direct discharges into the lake and as listed in the Table 5, the City has 0 (zero) point source area miles, which should indicate the waste allocation should be calculated as zero (currently listed to be 18.16 gallons/year).

The portion of the City shown in the subject TMDL document as the potential contributory drainage area consists of no catch basins or storm drains that drain into Machado Lake.

Therefore, the City requests to be exempted from the obligations associated with this TMDL for the following reasons:

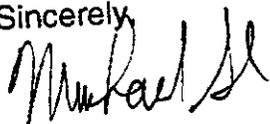
1. The City's drainage area is listed to be 0 (zero) square miles.
2. Even if there is a small fraction of land area included in the watershed, this is exceptionally small and would have negligible impact. The cost benefit of the spent resources to be involved in the subject TMDL cannot be justified.
3. The City of Redondo Beach is a proactive member of the Santa Monica Bay Bacteria (SMBB) TMDL, and as such the City has developed an integrated Implementation Plan with a goal of potentially reducing multiple pollutants of concern. The City has been and will continue to be intimately involved with implementing the tasks listed in the Plan to ensure pollutants such as trash have been fully addressed.
4. It would be more reasonable for the City to focus its resources to implement the SMBB TMDL and other upcoming SMBB TMDLs only. The majority of the City land area discharges into the Santa Monica Bay, which would make it more feasible and cost effective to pool all the resources set aside for these types of projects together in order to develop one monitoring, and one implementation plan. The small area draining into the Machado Lake would be subject to the same control measures of the implementation plan developed for the SMBB TMDL. As the result, this area would benefit from the appropriate BMPs designed for the entire City.

5. The City has installed many CDS systems in various high priority locations, which have been proven to collect trash and reduce their discharges into the Storm Drain systems

City of Redondo Beach is concerned that any aspects of the Machado Lake TMDL involving the City would jeopardize these potential resources, which could be spent on TMDLs mainly focused in the Santa Monica Bay.

We at the City appreciate all the efforts of your team in developing the TMDLs, and rely on our mutual understanding of working with limited budgets to implement these costly programs. If you have any questions or comments, I can be contacted by telephone at (310) 318-0661, extension 2455, or via email at Mike.Shay@redondo.org.

Sincerely,



Michael Shay, Principal Civil Engineer

CC: Eric Wu, State Water Resources Control Board