

## **Receiving Waters Limitation Compliance Report City of Rolling Hills August 28, 2008**

The City of Rolling Hills received a Notice of Violation (NOV) from the Regional Board stating that the City is in violation of waste discharge requirements established in Board Order No. 01-182 as amended by Orders R4-2006-0074 and Order No R4-2007-0042 (MS4 Permit). Regional Board technical staff had concluded that violations of the Receiving Waters Limitations provisions of Part 2.5 of the MS4 Permit have occurred due to prohibited discharges from the Municipal Separate Storm Sewer System (MS4) that cause or contribute to exceedances of bacterial objectives as established through the Basin Plan Amendment for Santa Monica Bay Beaches during Summer Dry Weather.

Based on the Regional Water Quality Control Board NOV dated March 4, 2008, the City of Rolling Hills is required to check “yes” to question II.A and II.B of the Individual Annual Report (Form U-4) of Los Angeles County Municipal Storm Water Permit Order No. 01-182 and to file a Receiving Water Limitations Compliance Report. As set forth in the City’s response to the NOV and in the report that follows, the City does not necessarily concede responsibility for the alleged exceedances that are the subject of the NOV and has provided evidence to demonstrate that land area within the City of Rolling Hills does not contribute runoff to the monitoring location in question. Notwithstanding, the City is providing this information as a good faith means of fully apprising the Regional Board of its activities and to comply with the provisions of the MS4 permit. If the water quality standards by which the alleged exceedances were gauged are found by a court or otherwise to be invalid and the exceedances referenced in the NOV are no longer exceedances of any applicable water quality standards, or should the NOV be otherwise nullified or rescinded, the City reserves the right to amend its answer to question I.B and withdraw the submittal of the RWL Compliance Report.

The NOV stated that violations of Receiving Waters Limitations occurred at shoreline monitoring site SMB 7-07 which is located near Whites Point in San Pedro. The City contends that the exceedances of bacteriological indicators which are the subject of the identified violations were not associated with MS4 discharges that are the responsibility of the City of Rolling Hills. As shown in Figure 1, which was constructed based on topographic delineation and County Storm Drain GIS information, land area within the City of Rolling Hills draining to the Santa Monica Bay does not contribute runoff via storm drains that outfall at monitoring location SMB 7-7 under the Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan dated April 7, 2004.<sup>1</sup> Therefore, the City contends that it has not violated Part 2.5 of the MS4 Permit whereby discharges from the Municipal Separate Storm Sewer System (MS4) during Summer Dry Weather are prohibited if they cause or contribute to exceedances of bacterial objectives for Santa Monica Bay Beaches.

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<sup>1</sup> Watershed boundary accuracy is dependent upon the accuracy of the storm drain network and topography data used to delineate the contributing drainage areas.

### **1. A description of the pollutants that are in exceedance and an analysis of possible sources**

Under the Santa Monica Bay Beaches Bacteria TMDL Coordinated Shoreline Monitoring Plan, the City of Rolling Hills is included in Jurisdictional Group 7. On May 21, 2008, the City of Rancho Palos Verdes, the lead agency for Jurisdictional Group 7, through its technical consultant prepared and submitted an information report in response to the March 4, 2008 Notices of Violation and Orders on behalf of Jurisdictional Group 7. The report discusses pollutants in exceedance and identifies potential sources of indicator bacteria at the site. Having no drainage to the site in question, the City of Rolling Hills has no additional information to provide beyond that submitted by the City of Rancho Palos Verdes on behalf of Jurisdictional Group 7 as a whole.

### **2. A plan to comply with the RWL (Permit, Part 2)**

The City of Rolling Hills has provided evidence to demonstrate that land area within the City does not contribute runoff to the monitoring location in question and contends that it is in compliance with Receiving Waters Limitations as specified in the MS4 Permit. As such, the City intends to continue implementing requirements of the MS4 Permit and the SQMP as they apply to the City.

The City of Rolling Hills is small, private, entirely residential community of single-family homes with fewer than 2,000 residents. The City by its very nature is already a model of low-impact development. There is no industrial or commercial land use within the City. There are no sidewalks, curbed streets or alleys within the City. The City's Zoning Ordinance contains strict development standards for development ratios on each property. Only 40% of the net lot area of a lot may be disturbed during construction. Only 35% of the net lot area may be developed with impervious surfaces, including structures, patios and other paved areas. Given that the minimum lot size in the City is one acre and the large lots are developed with single-family homes, the natural character of the City promotes infiltration of storm water into the ground and not onto streets. Stormwater run-off is conveyed through the City via natural drainage courses/canyons providing ample opportunity for runoff to infiltrate.

### **3. Changes to the SQMP to eliminate water quality exceedances**

The City continues to implement the Countywide Storm Water Quality Management Plan (SQMP) and since the City is in compliance with Receiving Water Limitations provisions of the MS4 Permit, no modifications to the SQMP are warranted at this time.

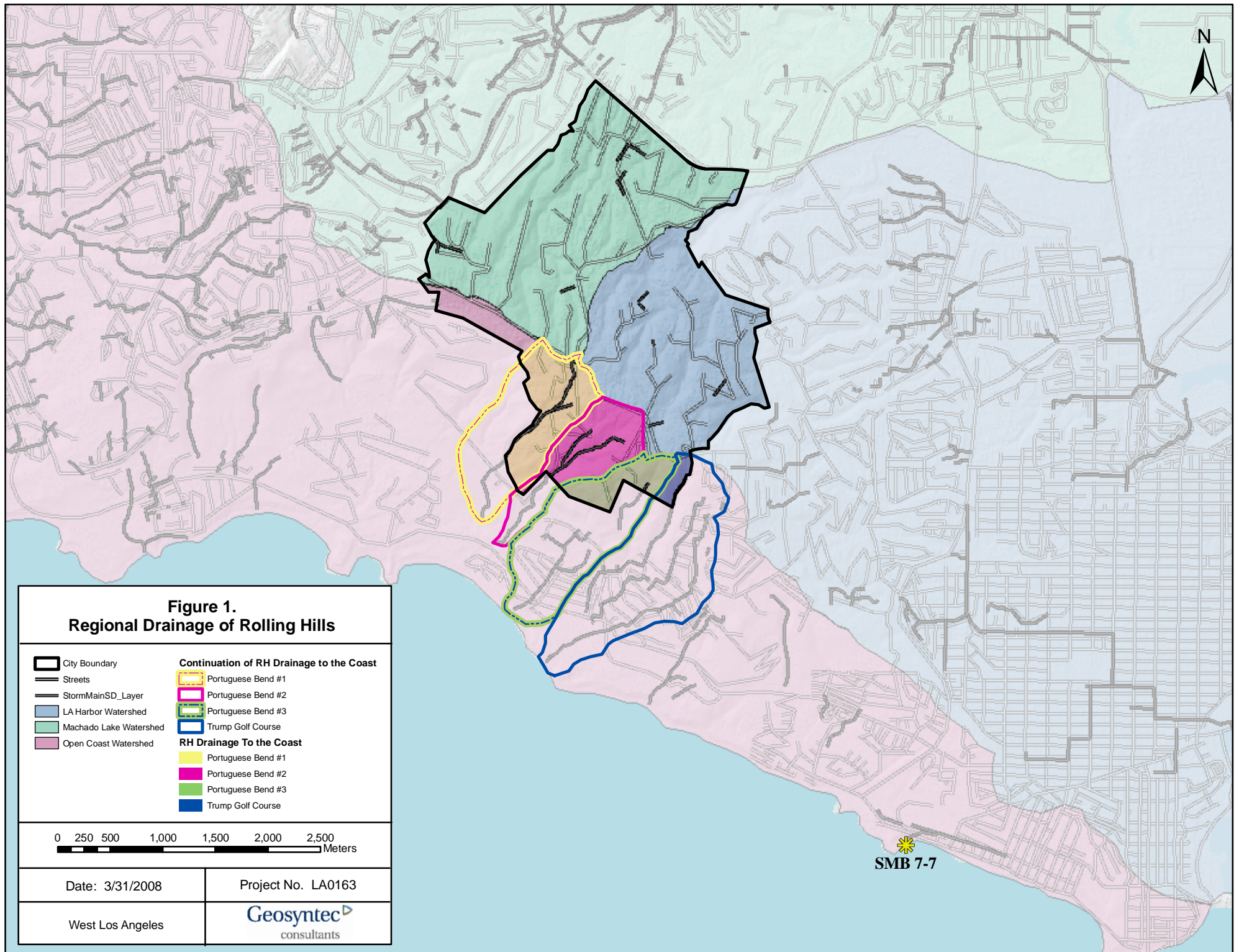
### **4. Enhanced monitoring to demonstrate compliance**

The City will defer recommendations regarding enhanced monitoring at the site in question to agencies which have drainage to monitoring site 7-7.

### **5. Results of implementation.**

The City is located on the Palos Verdes Peninsula which differs from other areas along the Santa Monica Bay because beaches along the Palos Verdes Peninsula have had historically fewer exceedances than the reference beach, so that maintenance of existing water quality is the objective for the Palos Verdes Peninsula cities.

A significant accomplishment that should assist in maintaining the high water quality of the Palos Verdes Peninsula area of the Santa Monica Bay was the success of the Palos Verdes Peninsula Land Conservancy and the City of Rancho Palos Verdes in creating the new Portuguese Bend Nature Preserve which consists of more than 1200 acres of rolling hills, natural canyons and rock outcrops, with significant habitat. The Preserve is to be managed according to the Natural Communities Conservation Plan.



**Figure 1.  
Regional Drainage of Rolling Hills**

- |                        |   |
|------------------------|---|
| City Boundary          | <b>Continuation of RH Drainage to the Coast</b> |
| Streets                | Portuguese Bend #1                              |
| StormMainSD_Layer      | Portuguese Bend #2                              |
| LA Harbor Watershed    | Portuguese Bend #3                              |
| Machado Lake Watershed | Trump Golf Course                               |
| Open Coast Watershed   | <b>RH Drainage To the Coast</b>                 |
|                        | Portuguese Bend #1                              |
|                        | Portuguese Bend #2                              |
|                        | Portuguese Bend #3                              |
|                        | Trump Golf Course                               |

0 250 500 1,000 1,500 2,000 2,500 Meters

Date: 3/31/2008

Project No. LA0163

West Los Angeles

**Geosyntec**  
consultants

SMB 7-7