

June 16, 2018

Dear Hermosa Beach City Council,

Residents living on and near the Greenbelt implore you to halt the current Greenbelt Stormwater Infiltration plan and relocate it to a safer and more appropriate site such as: (1) the Beach (as a reclaim and recycle project)¹; (2) on Herondo Street unimproved land or (3) to one of the original studied locations. City Staff is recommending that you authorize digging up the Greenbelt eight months from now, yet half the picture is missing, and critical data and serious risks are being ignored (exactly why has no site specific EIR been ordered yet?).



¹ Santa Monica is currently constructing a Tetra Tech designed underground stormwater treatment facility. This project reclaims, recycles and returns clean water to the ocean, rather than using infiltration. A recycling option is the most appropriate solution here given the pending drought years due to climate change and inevitable water rationing that will occur. To ignore and refuse to study this excellent option due to higher potential construction costs, is short sighted and is a disservice to the beach communities.

1. The Stormwater Project should be built on the Herondo Street Lot

Those of us living on the Greenbelt, a few feet from the proposed massive infiltration waters, have wondered since we learned of this in April how we were chosen and what other sites were in the running for this industrial sized water treatment plant. The EWMP² as well as the City's Proposition 1 Grant Application identify two sites as potential Regional BMPs³: (1) Hermosa Beach Greenbelt and (2) Herondo Street. Hermosa's grant application discusses these two potential sites throughout (see their included map above) The map's summary at the bottom boldly states: *"Both sites will be evaluated in a Site Analysis to determine which site will provide the most benefits"* . So far, no such study has come to light.

Given the inherent flaws in the Greenbelt location we were happy to learn of this Herondo Street option⁴ since it is an open, unimproved dirt lot, conveniently located across the street from the Greenbelt and with no nearby homes at risk. Also, it is more appropriately located in Redondo Beach, who along with Torrance provides 88% of the stormwater runoff versus Hermosa's paltry 10%.⁵ In its Prop 1 grant application, Hermosa specifically promises to analyze both locations and warrants that:

"Two sites for an infiltration system were identified in the EWMP. Both sites will be evaluated in more detail including soil capacity, side slopes sufficiency, and drainage ability and infrastructure compatibility. The Site Study Analysis will evaluate each site's strengths and weaknesses in relation to the project goals resulting in a final site selection." (emphasis added) p. 5

² Enhanced Watershed Management Program (EWMP), March 2018 p. ES-1. A third site is also enumerated here as Park #3, located in Redondo Beach. As far as we've been informed, no further study or information has been developed as to this site either. EWMP p. 2-63.

³ "BMP" collectively refers to strategies, control measures, and/or best management practices. EWMP pg. ES-1. The Prop.1 grant application can be found on the Hermosa Beach City website Infiltration document links.

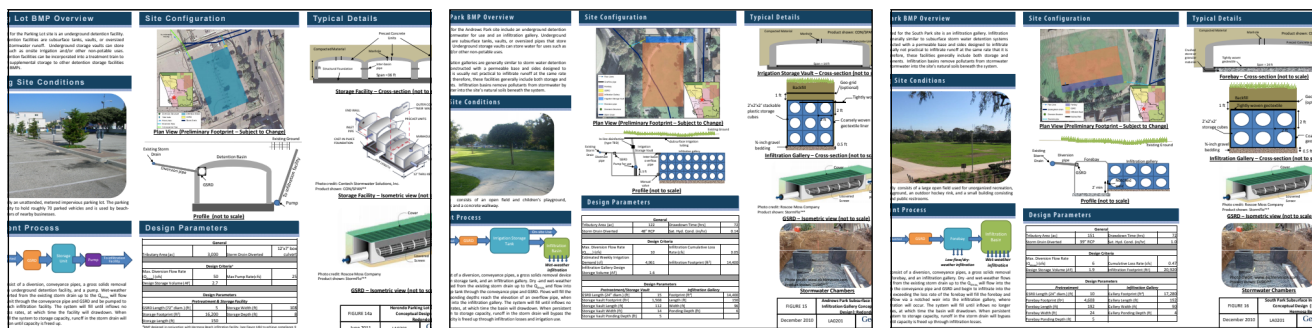
⁴The Herondo Street location is described as: "An area on the south side of Herondo Street (east of N. Francisca Avenue) below the Southern California Edison power line easement is an alternative site that will be assessed and evaluated for the proposed project. This site was identified during the EWMP process as one potential and suitable site for the various BMP types, including infiltration, wetland, or detention basins." (emphasis added). Proposition 1, Grant Application (March 2016) pp. 6-7.

⁵ Proposition 1 Grant Application, March 2016, p.2.

So where is this great side by side analysis that was promised to the State in exchange for Bond funding? From what we can tell, the City has failed to do the promised comparison and analysis. Someone (who?) decided to cut corners and immediately move forward with this project on the Greenbelt. City Staff and a Councilman have responded to our questions on why not build on Herondo instead of the Greenbelt: "it's too expensive", "the Utility company won't let us" ,"we'll be fined if this isn't done now", "we will lose our grant funding," etc. A whole lot of excuses to rush this through now, while ignoring unmitigateable impacts and proper analysis. Something does not add up here.

Redondo is in the process of purchasing 90 acres along Herondo, much of it open, unimproved, with no homes nearby to damage, and with a mandate to build parks, water features and green space. The power plant is decommissioned so the alleged objections of the electric company are moot. Hermosa should halt developing the Greenbelt and work with Redondo to relocate this project onto this more appropriate future parkland location.

2. Original Studies and Analysis Do Not Include the Greenbelt option



Herondo Parking Lot, Andrews and South Park

After many years of research and analysis at a mid-6 figure cost, in 2011 Geosyntec provided a design study researching and analyzing multiple options to address the polluted Stormwater flowing through the Herondo Outfall. The locations for processing the stormwaters that were recommended and analyzed include: Herondo Parking Lot and Beach Infiltration, Andrews Park and South Park.⁶ The Greenbelt was not included, studied or analyzed as a potential location. Somehow someone unknown rejected all of the data, studies, reports and conclusions on the selected sites and unilaterally moved the project to

⁶ Geosyntec Consultants. "Structural BMP Siting and Conceptual Design Study, Santa Monica Bay Beaches Bacteria TMDL Implementation", Project Number LA0201 June 2011.

the Greenbelt.⁷ We have not found nor has the City produced any City Council agenda items or votes on the matter, any new comparison studies, any documents, absolutely nothing has been found. The one and only reference the City has provided for this inexplicable turn of events is found in a later 2017 Geosyntec document.

“The [proposed] regional BMPs... *differed from those proposed in the 2011 Design Study, due in large part to identification of new opportunities and changes in client interest*...One of the identified regional BMPs was the Hermosa Beach Greenbelt Infiltration BMP (Beach Cities WMG, 2016), *which was not analyzed* as a potential BMP in the 2011 Design Study.⁸ (emphasis added)

What new opportunities arose? What changed the client interest? Who decided this and what were the reasons? Where is the City Council involvement in this drastic change to move a 2,000,000 gallon water treatment plant to be built 15 feet from homes on the greenbelt? One can't help but think, backroom deal.⁹ We deserve an answer on how this took place and where is the documentation to prove that it was done fairly and out in the open according to legal requirements, including the Brown Act.

3. The Greenbelt is a fatally flawed Site for an Infiltration Treatment Plant

A. The Water Table is too High for an Underground Infiltration Project.

The design to infiltrate 2,000,000 gallons of water directly into the Greenbelt for every storm event, is inherently defective. With groundwater elevations range between 30 feet to as high as 10 feet below ground, it doesn't take a genius to realize that the water is too darn high for this project to work as promised. The factual basis of this is detailed by Moorings resident and engineer Alex Reizman.¹⁰ To comply with legal regulations and calculations of the water table, the bottom of the infiltration structure must be no more than 5 feet below ground. This is a physical impossibility if the plant is to be buried underground. There is a reason large infiltration projects of this magnitude are not built near the beach, you simply cannot successfully infiltrate into a high water table.

⁷ Despite repeated requests for answers and documents from the City and after a review of online Agendas and taped meetings, no explanation for the switch has been provided.

⁸ Geosyntec Consultants, Draft Hydrology and Hydraulics Modeling Memorandum HB Greenbelt Infiltration Project,” April 7, 2017, p. 4.

⁹ The same document moves into modeling and sets an odd parameter: “To avoid intervention among multiple projects, no other planned BMPs from previous studies were included in the model. p.5

¹⁰ Alex Reizman letter to HB City Council, “Greenbelt Infiltration Project between Herondo and 2nd Street-Groundwater Issue”. June 14, 2018.

B. Homes and Structures are at Risk of due to Soil Subsidence & Liquefaction Hazards

Another fatal defect of the Greenbelt site is the liquefaction and soil subsidence risks to the surrounding homes and underground basements and parking structures. These too are detailed in a second letter drafted by Mr. Reizman to this City Council.¹¹ When Tetra Tech was asked by Mr. Reizman at the May 10 meet up about the risks of subsidence and liquefaction, Tetra Tech assured him that the infiltration plant would be built to withstand such risks. When a few participants responded, well that's nice for the treatment plant, but what about the homes existing right on top of and next to the structure?, Tetra Tech responded that they would be fine. When questioned as to how he knew that their homes would be fine, the employee conceded that there was no study or analysis of impact on surrounding structures completed nor was one planned under the terms of their current contract with the City. Who wouldn't be upset at such a lack of concern for the surrounding homeowners and their property? We need an EIR if this project continues on the greenbelt.

C. Zoning Laws.

The Greenbelt is zoned OS-1, Restricted Open Space. When I asked Councilman Massey (on facebook) about the inherent conflict of an industrial sized water treatment plant being built on the greenbelt, a park zoned open space, Mr. Massey responded that since the project was going underground, zoning laws do not apply. I'm no zoning or land use expert but I'm not entirely convinced that this is true.

As the HB City Attorney discussed in his excellent legal analysis on Greenbelt building restrictions, "the physical improvements permitted on the Greenbelt are limited by Sec 17.32.030 to the improvements stated therein,"¹² Underground items listed in the Code as permissible on the greenbelt include: irrigation improvements, erosion control and anti-seawater intrusion wells. All three items are expressly listed in the HB Zoning Code as viable underground improvements and hence "stated therein": underground *water infiltration plants* are not included on the list. Simply put, if it's not on the list, it can't be built and infiltration plants are definitely not on the list. If, as Mr. Massey stated, zoning laws don't apply because the project is underground, why do the zoning laws detailed by the City Attorney discuss what is and is not permissible to be built under the ground of the Greenbelt? There is a legal argument to be made that this infiltration project is a zoning if not other legal violation.

¹¹ Alex Reizman letter HB City Council, "Greenbelt Infiltration Project between Herondo and 2nd St- Adjacent Building Structure Liquefaction and Settlement Concerns" June 14, 2018.

¹² Jenkins & Hugin, Memorandum to HB City Council, "Improvements on the Greenbelt" February 22, 2018.

Conclusion

The fatal flaws of building the proposed stormwater infiltration project on the greenbelt are significant, unmitigateable and growing. It is time for the City Council to step in and take control of this project. We respectfully urge the City Council to stop the design of the Greenbelt Infiltration Project and instruct staff to relocate the project to one of the other more appropriate options. If Council rejects these arguments for relocation off of the greenbelt, then please at a minimum, order a site specific Environmental Impact Report. The risks are real and we deserve an unbiased study of what is being imposed on hundreds of homeowners against their wishes and reasonable expectations.

Best Regards,

Debbie Sanowski
Cochise HOA