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August 14, 2006

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



SUBJECT: Comment Letter – Ocean Plan Monitoring Amendments

The University of California, San Diego is writing to provide comments on the State's proposed "Model Ocean Discharge Monitoring - California Ocean Plan Amendment." The intention of this letter is to provide comments on the overall process and program based on Scripps Institution of Oceanography's Ocean Plan monitoring efforts to date.

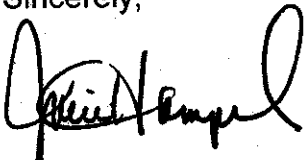
The monitoring measures proposed in these amendments are very prescriptive and it is not clear how many of them meet the goals for ocean protection. The proposed non-storm water point source effluent monitoring requirements for bacteria, for example, require monitoring at least five days per week for any discharger within one nautical mile of shore, regardless of flow or the presence of bacteria in the effluent. It is not clear how this expenditure of resources is protective of water quality. Ocean Plan Monitoring amendments should be developed in a collaborative effort with the Southern California Coastal Ocean Observation System (SCCOOS) and all of its partners.

The proposed monitoring throughout the document should include an adaptive process that provides a framework for dischargers that have already performed characterization monitoring to focus resources on identified pollutants of concern (e.g., reasonable potential analysis). Monitoring efforts should reflect constituents that are identified in the effluent, not the entire suite of constituents in Table B. In addition, the monitoring described throughout the document should clarify if it is receiving water monitoring or effluent monitoring.

The proposal to sample representative storm water outfalls should be modified to replace 10% with a process that instead captures large hydrologic sub-basins in a watershed (e.g., sample one storm water outfall from every drainage basin greater than 50 acres).

While the State and Regional Boards have a long history of working with SCCWRP to develop compliance based monitoring protocol, the work that is currently being done at Scripps Institution of Oceanography can help refine these protocols to more clearly create a nexus between compliance and ASBS resource protection. We look forward to working with the State as full partners in developing effectiveness based monitoring protocols.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Hampel". The signature is fluid and cursive, with a large loop at the end.

Julie Hampel
University of California, San Diego
Environment, Health and Safety
Environmental Affairs Division Manager