

# DEPARTMENT OF PUBLIC WORKS

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October 24, 2011

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, California 95814



Electronic delivery to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: Proposed Ocean Plan Amendments

Dear Ms. Townsend and Members of the Board:

Thank you for this opportunity to provide input into the proposed amendments to the California Ocean Plan. The County of Marin supports comments from the California Stormwater Quality Association (CASQA). Our primary concerns with and recommendations for the proposed amendments are below and specifically address Issue 1 (Appendix III): Model Monitoring:

- Statewide Plans and Policies – such as the Ocean Plan – by their nature cannot specifically address local and regional water quality issues. For this reason, such Plans and Policies have typically not included specific monitoring requirements. Overall statewide guidance for monitoring is normally provided within such Plans and Policies, and specific monitoring requirements are defined for specific dischargers within NPDES Permit provisions.

Furthermore, the principal purpose of the Ocean Plan is to protect the quality the state's coastal receiving waters, yet the proposed amendments specify a variety of discharge monitoring requirements. A more appropriate Ocean Plan amendment would identify a statewide ocean monitoring program for coastal receiving waters, as an analog to the state's Surface Water Ambient Monitoring Program (SWAMP) for freshwater receiving waters.

Therefore, we respectfully request that the proposed Model Monitoring amendments be withdrawn, and that the State Water Board instead convene an expert panel to review monitoring requirements statewide, and recommend a coherent, integrated approach to efficiently address the various needs for water quality monitoring in California.

- Significant terms included in the proposed amended California Ocean Plan are not defined. We strongly recommend that the amended language in the Ocean Plan include a reference to Title 40, Code of Federal Regulations, Chapter 1, Part 122.2 and Part 122.26 (40 CFR) in order to define the terms "point source" and "outfall".
- In addition, we recommend that language is added to Sections 4.3 and 5.3 to clarify that only storm water runoff from agricultural and golf course land uses are subject to core "non-point source" monitoring.

Finally, we request that you define "dry-weather" flow to exclude flow from any intermittent or perennial stream that may pass through a municipally-owned conveyance or outfall.

Thank you for your consideration of our comments. If you have any questions, please contact me at [tfashing@co.marin.ca.us](mailto:tfashing@co.marin.ca.us) or at 499-6583.

Sincerely,



Terri Fashing  
Stormwater Program Administrator  
County of Marin Department of Public Works

C (by email): Bob Beaumont, Director of Public Works  
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Tracy Clay, Principal Civil Engineer, Flood Control and Water Conservation District  
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