



# COUNTY OF ORANGE

RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT

Bryan Speegle, Director

Environmental Resources  
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July 15, 2006

8/1 and 8/15 Meetings  
COP Model Monitoring  
Deadline: 8/15/06 5pm

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



**Subject: Comment Letter – COP Model Monitoring**

Dear Ms. Her:

The County of Orange Resources and Development Management Department (OCRDMD) has reviewed the Proposed Draft Amendments to the Standard Monitoring Procedures (Appendix III) of the California Ocean Plan. We appreciate this opportunity to provide comments on the draft staff Ocean Plan amendments.

Overall, we support the efforts of State Water Resources Control Board (SWRCB) staff to develop procedures to provide direction to the Regional Boards on the implementation of the California Ocean Plan and to ensure the reporting of useful information. Listed below are comments representing specific issues that OCRDMD believes should be addressed before adopting the amendments.

- 1) General comment – The information provided on the website provided no justification for the monitoring requirements making it difficult to provide meaningful comments.
- 2) Effluent Monitoring, Bacteria – Permitted Storm Water Point Sources: Currently, the locations described in this section are monitored by OCRDMD once weekly throughout the year and by the Orange County Health Care Agency according to AB411 requirements. This level of monitoring results in twice weekly sampling throughout the dry weather season and full compliance with AB411 requirements.

The proposed increase to monitoring outfalls when flowing during dry weather to at least five times per week appears to be a typographic error since it would impose a requirement far beyond the intent of the AB411 statute. We believe that current level of monitoring provides sufficient characterization of bacterial impacts from permitted storm water point sources. The proposed increase would cost an estimated \$2 million per year in Orange County and result in the diversion of resources away from other monitoring priorities and limited additional public benefit.

Further, "flowing during dry weather" should be defined to eliminate many minor discharges that are too small to have a consequential impact on ocean quality.

Ms. Song Her  
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- 3) Effluent Monitoring, Table B, Permitted Storm Water Point Sources - The proposed requirement should be revised to allow for monitoring to be conducted at the storm water outfall or a representative mass emissions station located within the watershed. The current language would result in duplicative data collection to that currently conducted under our NPDES program.

Thank you again for the opportunity to provide comments on this important technical document. If you have any questions regarding these comments, please call Amanda Carr at 714-567-6367.

Very truly yours,

A handwritten signature in black ink, appearing to read "CC", with a long horizontal flourish extending to the right.

Chris Crompton, Manager  
Environmental Resources Section