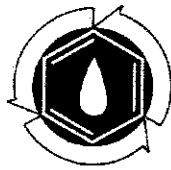


8/1 and 8/15 Meetings  
COP Model Monitoring  
Deadline: 8/15/06 5pm



**John L. Hunter**  
AND ASSOCIATES, INC.



August 14, 2006

SUBMITTED ELECTRONICALLY

State Water Resources Control Board  
Attn: Song Her

**Re: Comments/Suggestions on the proposed amendments to the California Ocean Plan**

We work with a number of municipalities that may be impacted by the "Proposed Draft Amendment to the Standard Monitoring Procedures (Appendix III) of the California Ocean Plan", we offer the following comments. Due to the limited review time, these comments should be regarded as preliminary.

First - There has not been sufficient time to review or adequately comment on an amendment of this scope. A minimum 45 day extension of any scheduled adoption activities by the Board is hereby requested.

Secondly - This amendment represents a potentially significant increase in the monitoring that must be conducted and there has not been an acknowledgement of the potential cost to municipalities nor has there been sufficient time for municipalities to review and comment on these potential costs.

Third - This rule appears to supersede the Santa Monica Bay TMDL monitoring plan that permittees spent several years' developing and has already been approved by the Regional Board.

Fourth - The test methods are now being specified. The Santa Monica Bay Technical Steering Committee spent a considerable amount of time reviewing test methods and the various laboratories currently conduct joint calibration exercises. If the methodology specified in the Amendment conflicts with the approved TMDL plan, it may throw everything into a state of confusion, including the potential for invalidating more than a year's worth of past sampling

Fifth - The SMB TMDL gave permittees a choice of monitoring daily or once per week. This will make daily bacteria monitoring mandatory. This is contrary to what the Regional Board has already approved and will conflict with long term financial arrangement already agreed upon by municipalities.

Sixth - Outfalls (over 36 inches in diameter) must be monitored for sediment and toxicity. This will be a costly addition to the monitoring program. The waters off our City are not listed as impaired for these constituents, therefore what is the scientific rationale for requiring a new and costly monitoring program? Similarly, the waters off the city are not listed as impaired for bacteria, so why is this monitoring being required?

And finally, there is no consideration for safety. Many outfalls along the shore are drilled through cliffs with discharge points 50 to 60 feet above rocky shorelines. There is no safe or even feasible way to collect samples from these locations.

Please call me if you have any questions.

John Hunter, P.E.  
R.E.A.

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