

January 8, 2013

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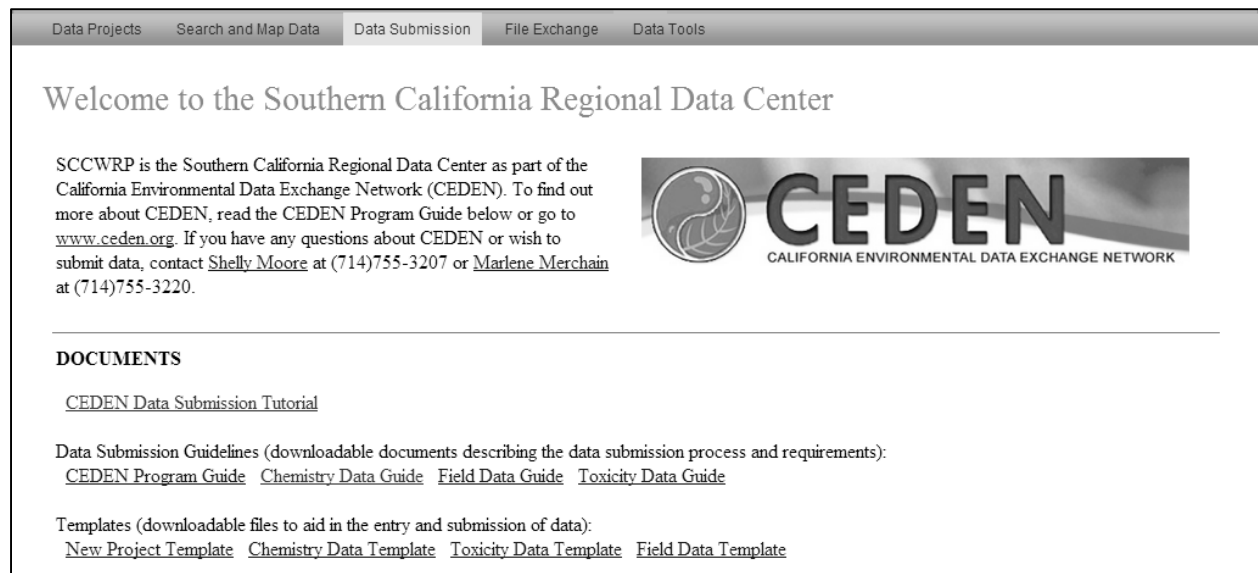
Subject: Comment – Tentative Order No. R9-2013-0001, Regional MS4 Permit, Place ID: 786088Wchiu.

Topic: Requirement to upload data to CEDEN

Section F.3.b.(3) of the Tentative Order requires that, “Any monitoring data utilized in developing the Annual Report must be uploaded to the California Environmental Data Exchange Network (CEDEN).”

We ask the RWQCB to either remove this requirement or make it optional. We see the following problems with the above requirement:

1. At its core, this new permit relies on Water Quality Improvement Plans which are to be prepared on a watershed by watershed basis. Bifurcating the reporting of monitoring information from the goals and objectives of the WQIPs makes the data unintelligible and superfluous to the public. Data should be reported through independent data warehouses associated with each of the ten WQIPs.
2. The phrase “any monitoring data” is ambiguous and creates a compliance burden on co-permittees that CEDEN currently does not support. As seen in the screen shot below, CEDEN supports only Chemistry, Field, and Toxicity data. The overall monitoring task under the Order includes a much larger data set.



3. Uploading data to CEDEN seems redundant since the Order is also asking co-permittees, “Any monitoring and assessment data utilized in developing the Annual Report must be provided on the Regional Clearinghouse required pursuant to Provision F.4.” A WMA-based data warehouse is a more practical and comprehensive source of data for the RWQCB, other co-permittees, and public.

4. In practical terms, uploading “any monitoring data” to CEDEN is unnecessary. CEDEN, through its data upload process, basically provides data standardization. However, the Order already requires that all monitoring data be compatible with SWAMP, the Surface Water Ambient Monitoring Program adopted by the State Water Board. So CEDEN formats must be identical to SWAMP, which happens to be the case, nullifying the value added by CEDEN. Co-permittees should not be burdened with this additional cost and statutory obligation.

The California Department of Water Resources or the State Water Board requires that grant funded projects submit their monitoring data to CEDEN. The primary recipients of these grants are non-government organizations employing citizen volunteers, and projects that do not have any legal obligation to meet stormwater permit requirements. Since their monitoring programs may not meet statutory standards, achieving some level of standardization through CEDEN in these situations is a reasonable objective. However, this is not the case with stormwater permittees.

Respectfully yours,

Joe

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