



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



August 15, 2006

RE: RESPONSE TO PROPOSED DRAFT AMENDMENTS TO THE STANDARD MONITORING PROCEDURES (APPENDIX III) OF THE CALIFORNIA OCEAN PLAN

The City of Oceanside is not in favor of adopting the proposed draft amendments to the California Ocean Plan.

Here is our reasoning:

We believe the proposed monitoring plan for Bacteria in permitted storm water point sources calls for excessive sampling. Monitoring coastal outfalls with flow five times per week goes beyond the requirements set in the California Health and Safety Code, Section 115880. As an alternative, we propose that a more rigorous monitoring plan be considered only for coastal outfalls flowing during dry weather that are currently or historically associated with elevated bacteria levels.

Qualifying Outfall Size: We request clarification on whether the statement "greater than 36 inches in diameter or width" includes outfalls equal to 36 inches in diameter or width, or refers only to outfalls with a diameter greater than 36 inches.

Qualifying Outfall Location: We request clarification regarding "the area required to be monitored." The proposed amendment does not specify whether the monitoring requirements for permitted storm water point sources includes just outfalls which discharge directly to the ocean, or all outfalls throughout the city.

Mussel Watch: Please clarify whether "Phase I Municipal storm water discharges" includes city wide discharges, or refers solely to coastal outfalls. We feel that conducting a mussel watch program at all coastal outfalls provides redundant monitoring and creates a safety liability. The majority of coastal outfalls in Oceanside are located along sandy beaches and do not experience continuous flow. To prevent desiccation, test mussels would have to be located within the receiving water; we believe this practice would create a potential safety hazard to recreational beachgoers and therefore a liability to the city.

Additionally several coastal outfalls in Oceanside are located within 100 yards of adjacent outfalls. Due to significant mixing caused by coastal currents and wave turbulence, we do not think there is a significant enough difference in water quality to warrant monitoring every outfall. An alternative we propose that mussel watch stations be established at major discharge points such as at creek, river, and lagoon mouths, or at set intervals along the coastline.

Agricultural Nonpoint Source Discharges: The City of Oceanside has a significant agricultural industry. We do not support adopting the proposed amendment as it does not provide adequate descriptive guidance for the monitoring process. We suggest including provisions for stakeholder/Regional Board dialogue regarding agricultural monitoring location and frequency decisions.

If you have any further questions, please contact Lynn Schwaebe at (760) 435-5822.

Sincerely,



Mo Lahsaiezadeh
Clean Water Program Coordinator