

## Central Coast Areas of Special Biological Significance Regional Dischargers Monitoring Program (ASBS RMP)

February 20, 2015



### **Member Entities**

*Caltrans*

*City of Carmel-by-the-Sea*

*City of Monterey*

*City of Pacific Grove*

*County of Marin*

*County of Monterey*

*County of San Mateo*

*Monterey Bay Aquarium*

*Pebble Beach Company*

*Stanford University  
Hopkins Marine Station  
City of Sand City*

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**Subject: Comment Letter - Statewide Bacteria Objectives – Scoping Comments**

Dear Ms. Townsend:

The Central Coast Areas of Special Biological Significance Regional Dischargers Monitoring Program (ASBS RMP) is submitting comments we have heard and compiled from our member agencies. The comments pertain to the range of actions and alternatives set forth in the State Water Resources Control Board's (SWRCB) Amendments to Water Quality Control Plans for Inland Surface Waters, Enclosed Bays and Estuaries and The Ocean Waters of California for Statewide Water Contact Recreation Bacteria Objectives.

### Element 1: Bacterial Indicators (Marine Waters)

ASBS RMP supports SWRCB Staff's proposal to use Enterococcus as a sole indicator.

### Element 2: Level of Public Health Protection for Illness Rate

ASBS RMP recommends SWRCB Staff adopt the use of the EPA's estimated illness rate of 36 per 1,000 as a reasonable threshold.

### Element 3: Address Natural Sources of Bacteria Levels

ASBS RMP supports SWRCB Staff's proposal to allow reference system/anti-degradation or natural sources exclusion approaches. In doing so, this will allow Permittees to focus efforts on bacteria coming from urban runoff discharges, and distinguish from naturally occurring bacteria. Using new techniques, we know it is possible to find human bacterial contamination. Eliminating human/anthropogenic sources of waste pollutants should be the priority as opposed to attempting to eliminate naturally occurring bacteria from wildlife sources.

### Element 5: Compliance Schedules and Interim Requirements

ASBS RMP recommends SWRCB Staff allow a ten-year compliance schedule to meet the new objectives for REC1 waters. Given constrained resources, providing sufficient time for Permittees to meet compliance objectives will be crucial.

### Element 7: Mixing Zones for Point Sources

One size does not fit all. ASBS RMP recommends SWRCB Staff allow mixing zones in a small area near outfalls, where appropriate.

### Element 8: Averaging Periods to Determine Compliance

ASBS RMP supports SWRCB Staff's proposal to specify an appropriate averaging period.

### **Program Manager**

*Monterey Regional Water  
Pollution Control Agency*

*5 Harris Court, Bldg. D  
Monterey, CA 93940*

*Attn:  
Jeff Condit  
(831) 645-4621*

Element 9: Effluent Monitoring and Reporting Frequency

ASBS RMP recommends SWRCB Staff provide narrative guidance to be used as guidelines to help establish monitoring frequencies in NPDES permits. SWRCB Staff should work with individual Permittees to establish appropriate and effective monitoring frequencies, since conditions vary and monitoring should be tailored to site-specific conditions.

Element 10: Analytical Methods to Measure Bacteria Indicators

ASBS RMP supports SWRCB Staff's proposal to take no action.

Element 11: Allow for a Variance, Seasonal Suspension, or Limited REC1

ASBS RMP supports SWRCB Staff's proposal to allow the use of a variance, seasonal suspension or Limited REC1.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Jeff Condit". The signature is written in a cursive style with a prominent initial "J".

Jeff Condit  
Program Manager, ASBS RMP