



THE CITY OF SAN DIEGO

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

August 14, 2006

Dominic Gregorio
Division of Water Quality
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100



Dear Dominic:

Subject: Comment Letter – COP Model Monitoring

The City of San Diego is pleased to provide you with our comments regarding the draft Model Ocean Discharge Monitoring program. These comments were provided verbally at the public workshop on August 8, 2006. We support the use of the U.S. Environmental Protection Agency criteria for designating 36-inch storm drain outfalls as being part of this program. We request a definition of the Effluent Monitoring, Bacteria – Non-Storm Water Point Sources component. Additionally, we request clarification as to whether the agricultural non-point sources discharges pertain to direct discharges to the ocean or to receiving waters that discharge into the ocean. Finally, we recommend that the dry weather effluent bacteria monitoring occur once a week. This recommendation would be consistent with Health and Safety Code Section 115880(c)(4). Consideration of this request would maintain a consistent bacteria sampling program that affects the posting beach advisories and closures up and down the California coastline.

If you have any questions regarding these comments, please contact Ruth Kolb at (619) 525-8636 or at rkolb@sandiego.gov.

Sincerely,

Chris Zirkle
Chris Zirkle
Deputy Director

CZ/ rk

cc: File
Ruth Kolb



Storm Water Pollution Prevention Program

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