



State Water Resources Control Board



Linda S. Adams
Secretary for
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Division of Water Quality
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Arnold Schwarzenegger
Governor

JUN 15 2009

Dr. Dave Hankin, Acting Director
HSU Marine Laboratory
Humboldt State University
P.O. Box 690
Trinidad, CA 95570-0690

Dear Dr. Hankin,

**INTENT TO DEVELOP AN INTEGRATED REGIONAL MONITORING PLAN FOR
AREAS OF SPECIAL BIOLOGICAL SIGNIFICANCE (ASBS) FROM SHELTER COVE
TO REDWOOD NATIONAL PARK**

Thank you for your letter dated March 7, 2009, requesting approval to move forward with a localized monitoring program in lieu of participating in a larger integrated regional monitoring program encompassing biological and water chemistry data.

As we discussed in our recent telephone conversation, staff is supportive of a regional monitoring approach for ASBS discharges. However, any regional monitoring plan would need to be approved by both the State Water Resources Control Board and Regional Water Quality Control Boards (Water Boards). From the State Water Board perspective, we would need to ensure that there is consistency of monitoring components, methods, data quality, and data management among all regional programs in order to ensure statewide comparability.

From a practical standpoint, a fully integrated regional approach would reduce cost and effort. One set of cost savings may occur primarily through a reduction in the number of contact points for both dischargers and the Water Boards so that meetings and management costs are minimized. When considering water quality testing, volume discounts are possible to reduce analytical costs. Also important is the potential for cost sharing on a larger number of reference sites that can be used for comparison. Cost and effort may also be reduced, and data quality improved, with consistent data quality objectives through a single Quality Assurance Project Plan (QAPP) that is Surface Water Ambient Monitoring Program (SWAMP) comparable. It should be noted as well that all monitoring data must be submitted in SWAMP format.

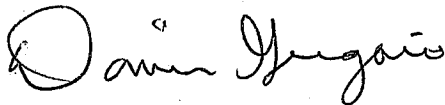
Coordination of biological monitoring data on a larger regional scale allows for the discharger to assess localized site conditions while still allowing the regulatory and

scientific community to analyze results in a larger context. By having multiple discharge and reference sites monitored identically, all parties will be able to use the broad information to look for patterns in the results.

Based on all of the above considerations, you may consider expanding the geographic extent of your proposed regional monitoring program or at least ensure that there is adequate collaboration with neighboring regional programs.

Should you have any questions, please feel free to contact me at (916) 341-5488 (dgregorio@waterboards.ca.gov) or Connie Anderson, Environmental Scientist, Ocean Unit, at (916) 341-5280 (csanderson@waterboards.ca.gov).

Sincerely,



Dominic Gregorio
Chief, Ocean Unit