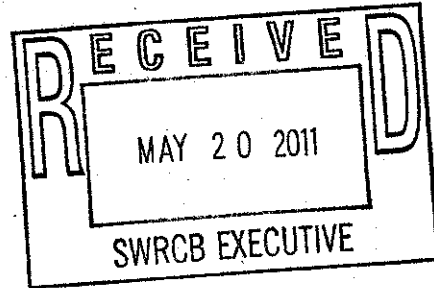




engineering and constructing a better tomorrow

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



Subject: Comment Letter – ASBS Special Protections

As a professional scientist and leader in storm water and aquatic community monitoring, including ocean monitoring, in California for the past 30 years I recognize the importance of the health of the aquatic communities in California's waters. I support the goal of the State Water Resources Control Board to maintain a high level of water quality in Areas of Special Biological Significance (ASBS) of California. Developing a resolution that allows for discharges to ASBS that do not compromise beneficial uses is a step in the right direction. However, some of the proposed amendments in the Draft ASBS Resolution impede national security activities at San Clemente and San Nicolas Islands, are excessively burdensome to dischargers, and are not useful such as using intertidal surveys in distinguishing between natural and human influences. Please consider the enclosed comments.

If you have any questions, I can be reached at (858) 514-7732. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Scott Steinert".

Scott Steinert
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Proposed Waterfront and Marine Operations Should Exempt Military Vessels and Operations

The Draft ASBS Resolution has additional monitoring and management requirements for waterfront and marine operations. The monitoring and management requirements are clearly designed for recreational and commercial marinas. Military vessels and operations should be exempt from these requirements.

Proposed Monitoring Requirements are Excessively Burdensome to Dischargers

The Draft ASBS Resolution's sampling requirements are excessive. Samplers are unable to sample at San Clemente Island and San Nicolas Island on a 24/7 schedule. Forecasting weather for these islands is more difficult and this makes it much more difficult to mobilize for storm water sampling. Planes do not travel to and from these islands on a daily basis. The lack of frequent travel could result in exceedance of the holding times. A provision for sampling during normal business hours needs to be included to protect the safety of samplers and ensure that qualifying storm events can be effectively sampled. Proposed sediment sampling requirement is excessive without evidence of human activities impacting sediments.

Inspection of facilities is already required by industrial and construction general permits. The inspection requirements in this resolution are redundant and unnecessary to ensure activities are not impacting the ASBS.

Intertidal Surveys are not Useful in Distinguishing between Natural and Human Influence on ASBS

Intertidal surveys of benthic marine life do not serve a purpose in this resolution. These surveys are not capable of differentiating between natural and human influences on ASBS. Therefore the requirement should be removed from the resolution.