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March 15, 2010

Constance Anderson, Environmental Scientist
State Water Quality Control Board
Division of Water Quality, Ocean Unit
P.O. Box 100
Sacramento, CA 95812-0100

SUBJECT: Notice of Preparation of a Statewide Program Environmental Impact Report for a General Exception to the California Ocean Plan Waste Discharge Prohibition for Selected Discharges into Areas of Special Biological Significance, including Special Protections for Beneficial Uses.

Dear Ms. Anderson,

The University of California, San Diego (UCSD) welcomes the opportunity to comment on the draft document referenced above.

UCSD is supportive of the regional monitoring approach described on page B-15. Having done both the individual monitoring and the regional monitoring over the last five years, UCSD has found that the regional monitoring better supports effective ASBS management. The data collected by the Southern California Bight'08 ASBS workgroup, for example, will be used to help define the ranges of "natural water quality" and to evaluate how the water quality in participating ASBS compare to these ranges. By continuing to collect and evaluate water quality and biological monitoring data from ASBS on a regional scale over time, we will have better scientific data to define the ranges of natural water quality, the health of the ASBS ecosystems, and to prioritize impacts to ASBS that need to be addressed.

The San Francisco Estuary Institute's Regional Monitoring Program is another good example of the success and value of regional monitoring. Under this program, the regulators and the regulated discharge community share financial support, direction, and participation in a model of collective responsibility. The monitoring, based on sound science, has established a climate of cooperation and a commitment to participation among a wide range of regulators, dischargers, industry representatives, community activists, and scientists. The result is an adaptive, long-term program of study that supports efficient and effective management of the San Francisco Bay.

By adopting similar objectives in the ASBS Regional Monitoring Program, the data collected could be used to:

1. Describe the distribution and trends of pollutant concentrations in the ASBS
2. Project future contaminant status and trends using best available understanding of ecosystem processes and human activities
3. Describe sources, pathways, and loading of pollutants entering the ASBS
4. Measure pollution exposure and effects on selected parts of the ASBS ecosystem
5. Compare monitoring information to relevant benchmarks, such as Ocean Plan water quality objectives and data from reference locations (natural water quality indicators)
6. Effectively communicate information from a range of sources to present a more complete picture of the sources, distribution, fate, and effects of pollutants and beneficial use attainment or impairment in the ASBS ecosystem

The ASBS regional monitoring program should also include a comprehensive assessment of the individual ASBS monitoring data (chemical, biological, and physical) that has been collected to date and/or that is collected in the future. By combining and evaluating the data collected under a regional program with data from other sources, the regulatory agencies and the regulated community will have a better understanding of the physical, biological, and chemical status of our ASBS and how to best manage these precious resources.

UCSD looks forward to continuing to work with the State Water Resources Control Board, the Regional Water Quality Control Board, the other ASBS dischargers, and San Diego Coastkeeper on ASBS protection.

Sincerely,

Kimberly O'Connell

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