



County of Santa Cruz

HEALTH SERVICES AGENCY

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ENVIRONMENTAL HEALTH SERVICES

October 24, 2011

Charles R. Hoppin, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Comment Letter – California Ocean Plan Amendments

Dear Mr. Hoppin:

I am writing on behalf of Santa Cruz County Environmental Health Services to voice strong concern for the proposed amendments to the California Ocean Plan. While we share the State Water Quality Control Board's objective of maintaining and improving ocean waters, we do not support the recommended monitoring program contained in these amendments. Any monitoring program must be locally derived, technically feasible, and supported with an equitable funding mechanism, and we feel that the proposed program does not meet any of these requirements.

In partnership with numerous partners, the County of Santa Cruz has implemented a water quality monitoring program for over three decades. This program is designed to answer specific questions of local concern and is supported through a variety of mechanisms. The County provides weekly monitoring at 26 beaches and 6 freshwater sites; monthly or bi-monthly monitoring at approximately 15 freshwater sites; and other monitoring in support of specific studies. Some of these special studies have included source-tracking of pollutants and genetic analysis of bacteria to determine their source. The County provides support for citizen monitoring activities, and has close collaborations with the Monterey Bay National Marine Sanctuary, the Central Coast Regional Water Quality Control Board's Central Coast Ambient Monitoring Program (CCAMP), the Southern California Coastal Water Research Project (SCCWRP) and the Central Coast Long-term Environmental Assessment Network (CCLEAN). Through the Santa Cruz Integrated Regional Water Management (IRWM) plan, the County and our partners are developing a monitoring program that assesses the status and trends of local water quality and the relationship between those trends and management efforts. We also continue to support development of a regional monitoring program for the Monterey Bay area that would maximize limited resources for water quality monitoring.

As the above demonstrates, the County is committed to monitoring discharges and the quality of receiving waters and developing management programs in response to concerns. However, it is worth noting that the near-shore ocean environment is an extremely complex system with numerous stressors acting upon it. Attempting to tease out impacts from the various inputs is a nearly impossible task, and one that has the potential to consume vast resources with no discernable benefit. This is especially true for differentiating the effects of other, non-stormwater discharges into the tidal zone. Because of issues regarding timing of tidal cycles, tidal exchange, long-shore currents, and storm/runoff hydrology, the technical issues in making such assessments are significant. Toxicity testing is particularly problematic for stormwater discharges, because it is technically infeasible to accurately quantify the effects of a short-lived, transient input (stormwater runoff) in the course of a multi-day toxicity test procedure.

In addition to these technical issues we are greatly concerned with the cost of implementing the proposed monitoring program. It is neither reasonable nor equitable to burden just the coastal dischargers with the responsibility of monitoring the condition of the receiving waters. We object strongly to any amendment that places the burden of expensive monitoring requirements with questionable value on local agencies. Generalized, top-down monitoring requirements would only serve to diminish resources available for the existing monitoring and management efforts in our County. The proposed monitoring requirements constitute an unfunded mandate and the costs to perform the monitoring should either be reimbursed by the State or the State should conduct the monitoring themselves. This is of particular concern given the current fiscal environment that has seen significant reduction in the resources available to the County.

We respectfully request that the proposed Model Monitoring amendments be withdrawn, and that the State Water Board instead convene an expert panel to review monitoring requirements statewide, and recommend a coherent, integrated approach to efficiently address the various needs for water quality monitoring in California. If you have any questions, please feel free to contact me at 831.454.2750. Thank you for your consideration.

Sincerely,



for John A. Ricker
Water Resources Division Director
Santa Cruz County