



You state:

#### 2.6.2 Environmental Baseline

Phase I MS4 (storm water) dischargers are medium and large cities or certain counties with populations of 100,000 or more. Phase II dischargers are small MS4s serving populations less than 100,000 persons and are typically located in urbanized areas. Generally, Phase I MS4s are covered by individual permits and Phase II MS4s are covered by a general permit. It is estimated that there are approximately 542 storm water ocean outfalls exceeding 36 inches *in diameter or width*, approximately 253 of which belong to Phase I MS4 permittees and approximately 198 of which belong to Phase II MS4 permittees. Storm water outfalls have been estimated using data from Santa Monica Bay and extrapolated for the entire state. There are approximately one dozen (12) industrial storm water discharges to the ocean.

Comments:

The use of Santa Monica Bay as the criteria for the rest of the State is criminal. There are so many problems with fraudulent representation of Commissions, compromise of data, conflicts of interests and non-contractual arrangements that Santa Monica Bay is not a reliable source. It is certainly unfair to the rest of the State that does not have the same geology (or much else in common) to be under the gun of a mismanaged area.

You state:

#### Issue 1 - Appendix III, Model Monitoring

*The development of monitoring requirements is partially in response to Senate Bill 72 (2001), Section 13383.5 of the California Water Code, which states that the State Water Board "shall develop minimum monitoring requirements for each regulated municipality and minimum standard monitoring requirements for regulated industries."*

Comments:

Just what industries are you addressing. We see golf courses but not cemeteries. This is weak and needs to be expanded into realistic source point pollutant identification and mitigation.

You state:

#### 4. INDICATOR BACTERIA\*

To answer these questions, core monitoring shall be conducted in receiving water\* *on the shoreline* for *the* indicator bacteria\* at a minimum *five times per month weekly* for any point sources discharging treated sewage effluent:

*Alternatively, these requirements may be met through participation in a regional monitoring program to assess the status of marine contact recreation water quality. If the permittee participates in a regional monitoring program, in conjunction with local health organization(s), core monitoring may be suspended for that period at the discretion of the Regional Water Board. Regional monitoring should be used to answer the above questions, and may be used to answer additional questions. These additional questions may include, but are not limited to, questions regarding the extent and magnitude of current or potential receiving water\* indicator bacteria\* problems, or the sources of indicator bacteria.*

Comments:

The “regional monitoring program” is too loose a description. Will it involve regulated public health regulations. So far, in Los Angeles County, we have seen insider guided, non- governing body approved “guidelines”. It may look regional, but it is custom designed to avoid proper oversight and real regulation. Where is the State Department of Public Health in this process.

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