



Water Quality Standards are subjective, based on scientific fact, based on modeling, based on monitoring, based on peer review or determined by an oversight board.

MEP Maximum Extent Practicable is based on BMP Best Management Practices which are based on administrative interpretation.

Baselines are not established. There is an ongoing study (university professor and a non-profit organization) of methane out gassing leakage in the South Coast Basin that is showing alarming preliminary results. Concentrations are high in some areas. This has to affect water quality standards. Either pipes are broken, oil wells not probably maintained, fracking migration or infrastructure in poor condition still operating. That report is not out yet.

There needs to be an investigative approach as to why there is a problem. Definitions need to meet conditions not assumption of conditions.

Is there overdevelopment and no infrastructure at levels of that growth.

Are there military operations in the oceans that may affect the waters. We have attended meetings where scientists are studying the waters, but under (military) secrecy.

Is there that natural barrier, such as the Southern California Bight, that affects the receiving waters pollutant load. Is that pollution from current receipt or from tidal flows-both near shore and deep ocean.

How will you address the tsunami effects from Japan and its debris contamination.

If TMDL implementation are through the permits, then more work is needed to ensure those TMDLs are reasonable. So far, we see industry deciding definitions, since there are really no history.

With changes in the shoreline by man-made developments-marinas, ports and the like, how are receiving waters changed from its natural tidal flow already.

Sediment flows need to be addressed in normal conditions, wet weather conditions, fire conditions and natural disaster conditions.

Weather should be discussed.

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