

Surfrider Foundation

October 9, 2008

Executive Officer and Members of the Board
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

RE: Draft Revised Order No. R3-2008-0065 (City of Morro Bay/Cayucos Sanitary District Wastewater Treatment Plant)

Via electronic mail

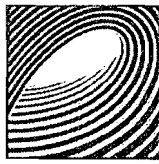
Dear Mr. Briggs and Board Members,

I am writing on behalf of the Surfrider Foundation in regards to the draft of the Waste Discharges Requirements for the Morro Bay and Cayucos Wastewater Treatment Plant Discharges to the Pacific Ocean, Order No. R3-2008-0065 ("Draft Permit"). The Surfrider Foundation is a grassroots environmental organization dedicated to the protection and enjoyment of our coasts and oceans by all people.

On behalf of the Surfrider Foundation's San Luis Bay Chapter and the Surfrider Foundation membership, I would like to express our concern with the inconsistency of the Monitoring and Reporting Program ("Program") as proposed in the Draft Permit with the State Water Resources Control Board's 2005 California Ocean Plan ("Ocean Plan") requirements and AB 411 standards. We disagree with Staff's assessment that triggered surf-zone monitoring based *only* on exceedances of the total coliform effluent limitation is appropriate. Because of the singular reliance on total coliform levels in effluent monitoring to determine the need for additional surf-zone monitoring, the Program does not satisfy the bacterial objectives outlined in the Water-Contact Standards of the Ocean Plan or the minimum monitoring standards put forth by AB 411.

The scientific basis for monitoring both fecal coliform and enterocci bacteria in addition to total coliform bacteria is founded upon the relationship between these bacteria. Total coliform bacteria is an umbrella group that consists of a number of different bacteria, which includes fecal coliform, enterococci and several other bacteria. Fecal coliform and enterococci are restricted to the intestinal tract of warm-blooded animals, whereas total coliform also includes bacteria from decaying plant matter.¹ Because of the nature of this relationship, exceedances of fecal coliform or enterococci bacteria levels do not necessarily correlate with an exceedance of total coliform bacteria levels, meaning that it is possible for both fecal coliform and enterococci bacteria to have exceeded standards even if total coliform bacteria levels have not.

¹ California Department of Public Health. *Microbiological Indicator Organisms in Standards and Guidance, Draft Guidance for Salt and Freshwater Beaches*, Appendix D: pp 1-2 (2000).
<http://www.cdph.ca.gov/HealthInfo/environhealth/water/Documents/Beaches/AppendixD.pdf>



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The Ocean Plan, which applies to point source discharges to the ocean (Ocean Plan at 1), sets limits of water quality characteristics (Ocean Plan at 4) to protect the beneficial uses of State ocean waters. These beneficial uses include water-contact recreation [REC-1] (Ocean Plan at 3). The Ocean Plan also outlines standards for water-contact monitoring to ensure implementation of these limits, which includes standards for total coliform, fecal coliform, and enterococci (Ocean Plan at 20). AB 411 identifies testing water for total coliform, fecal coliform, and enterococci bacteria as the minimum standard for measuring microbiological contamination of waters adjacent to public beaches (California Health and Safety Code § 115880 (c)(1)).

As outlined in the Draft Permit, the Basin Plan adopted by Central Coast Water Quality Control Board identifies water contact (REC-1) as a beneficial use of Estero Bay coastal waters (Draft Permit at 7), where the effluent from the plant is discharged. As such, to achieve the objectives of the Ocean Plan, the Effluent Monitoring Requirements should require that all three bacteria—fecal coliform, enterococci, and total coliform—are monitored at Monitoring Location M-001 (Draft Permit at E-6). These changes in the monitoring plan would also facilitate the Program's consistency with AB 411 standards. However, to ensure proper assessment of bacteriological conditions in water-contact areas and fulfill the original purpose of the surf-zone monitoring requirement², the provisions regarding receiving water monitoring for bacteria (Draft Permit at 27, E-6) should also be changed to trigger surf zone monitoring when effluent limitations for total coliform, fecal coliform, and/or enterococci bacteria are exceeded. The proposed changes would eliminate the problematic reliance on total coliform levels as an indicator of fecal coliform and/or enterococci levels while still maintaining the "trigger" approach advocated by Staff to meet the 301(h) monitoring requirements.

Based on the above information, we respectfully request alteration of the aforementioned provisions in the Draft Permit to include monitoring of fecal coliform and enterococci bacteria in the Effluent Monitoring Requirements and to require that effluent limitation exceedances of any one of these bacteria (including total coliform) trigger surf-zone monitoring.

Sincerely,

Sarah Corbin
Central California Regional Manager
Surfrider Foundation

² The text on page F-38 of the Draft Permit describes the original purpose of the surfzone monitoring requirement as ensuring that the discharge is not causing exceedances of receiving water bacteria requirements.