



CITY OF OCEANSIDE
Department of Harbor and Beaches

SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

2013 MAR 11 A 8:21

March 7, 2013

San Diego Regional Water Quality Control Board
ATTN: Kristin Schwall
9174 Sky Park Court, Suite 100
San Diego, CA. 92123-4340

Dear Ms. Schwall,

The City of Oceanside respectfully submits this comment letter on Tentative Order **R9-2013-0026**, "General Waste Discharge Requirements for Discharges from Boatyards and Boat Maintenance Facilities Adjacent to Surface Waters within the San Diego Region." The City of Oceanside would like to thank the San Diego Regional Water Quality Control Board (Regional Board) for their consideration of stakeholder comments in the development of the order.

As a member of the Regional Harbor Monitoring Program (RHMP), the City of Oceanside respectfully wishes to submit the following comment:

Attachment E, Section V.A.1-2 and V.B.3. proposes that Dischargers perform receiving water and sediment monitoring to assess compliance with receiving water limits individually or through participation in a water body monitoring coalition. The City of Oceanside supports and appreciates the removal of the RHMP as a named monitoring coalition from the Administrative Draft General Boatyard Permit.

The RHMP was initiated in 2003 in response to a request for information by the Regional Board pursuant to California Water Code Sec. 13225. The program was initially scoped to gather and interpret information on the status and trends in water and sediment quality in Oceanside Harbor, San Diego Bay, Mission Bay and Dana Point. As the RHMP program was designed to monitor ambient conditions in receiving waters, we feel that its previous inclusion in Tentative Order R9-2013-0026 as a monitoring coalition was inappropriate, considering the Tentative Order is an NPDES permit aimed at assessing facility compliance with discharge and receiving water limitations.

The Monitoring and Reporting Plan (Attachment E) in Tentative Order R9-2013-0026 establishes a framework for determining if applicable water and sediment quality standards are being met by the entities named in the permit. The RHMP, however, was not designed to make these assessments nor answer questions related to relationships between discharges and receiving water conditions. Additionally, facilities participating

in monitoring coalition with fundamentally different purposes and scope may place an uncertain degree of liability on those entities not formally named to a compliance-based monitoring permit. Due to these differences in applicability, we support the removal of the RHMP from Tentative Order R9-2013-0026.

On behalf of the City of Oceanside, I would like to thank you for the opportunity to submit comments on Tentative Order R9-2013-0026. Please contact me directly via email (fquan@ci.oceanside.ca.us) or telephone (760-435-4032) if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink that reads "J. F. Quan". The signature is written in a cursive style with a large, looped "Q" and a distinct "J".

Frank Quan
City of Oceanside
Department of Public Works
Harbor and Beaches Division