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To: "csanderson@waterboards.ca.gov" <csanderson@waterboards.ca.gov>
Date: 3/14/2010 5:49 PM
Subject: Comments on Notice of Preparation of a Statewide Program EIR and Special Protections for ASBS's

Constance Anderson, Environmental Scientist
State Water Resources Control Board
Division of Water Quality, Ocean Unit
P.O. Box 100 Sacramento, CA 95812-0100

Dear Connie:

Thanks for the opportunity to respond to the IS and Special Protections for the General Exception Program EIR. Although we do not have comments regarding the "issues of concern" selected by the State Water Board Staff, we do have some questions and requests for clarification, especially with regard to the Special Protections. They are as follows:

- 1) Within the Initial Study and the Special Protections, there are several references to "natural water quality" and "natural ocean water quality". It is clear that the intent is to maintain "natural ocean water quality", but will the term "natural water quality" also apply to discharged water during storm events? With respect to the term "natural water quality", please clarify how natural water quality will be determined for either receiving waters or discharges. In addition, it is not clear who will be responsible for determining same or if "natural water quality" will be determined prior to or thru the Special Protections Monitoring Program. Perhaps we have missed earlier communications about this issue, but we would like clarification.
- 2) Within the Del Mar Landing ASBS, the quality of ocean waters can be suddenly and significantly affected by sediments discharging from the mouth of the Gualala River during large storm events. The river enters the ocean approximately 2 miles north of the ASBS. Would the Gualala River watershed and its discharges be used to "characterize natural water quality" within the Regional Integrated Monitoring Program (B. 2. of Ocean Receiving Water Monitoring Program).
- 3) The Special Protections Core Discharge Monitoring Program requires that only outfalls equal to or greater than 18" in diameter be sampled. We assume from this that any outfall less than 18" is therefore not subject to monitoring, and that this includes receiving waters as well. Please clarify if this is not the case.
- 4) At present, there appears to be no information regarding costs to The Sea Ranch Association regarding participation in the Regional Integrated Monitoring Program. If a discharger chose to participate in the Regional Program, could that participant withdraw at a later date if costs were found to exceed those of an individual monitoring program? Would the reverse be true?

Thanks for the opportunity to comment.

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